## Report of Leviton Manufacturing Co., Inc. on behalf of itself, Viscor Inc. and Berk-Tek LLC ("Leviton")

for Fiscal Year 2023 Pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9 ("Act")

## **DEFINITIONS**

**child labour** means labour or services provided or offered to be provided by persons under the age of 18 years and that

- a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999. (*travail des enfants*) (Convention C182 Worst Forms of Child Labour Convention, 1999 (No. 182) (ilo.org))

forced labour means labour or service provided or offered to be provided by a person under circumstances that

- could reasonably be expected to cause the person to believe their safety or the safety of a
  person known to them would be threatened if they failed to provide or offer to provide the
  labour or service; or
- b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930. (*travail forcé*) (Convention C029 Forced Labour Convention, 1930 (No. 29) (ilo.org))

## Annual report

Pursuant to Section #11 (1) of the Act, every entity must, on or before May 31 of each year, report to the Minister on the steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

Key elements	Leviton's approach to Fighting Against Forced Labour and Child Labour in Supply Chains Act Modern Slavery and Human Trafficking Statement
(a) its structure, activities and supply chains;	Leviton is a global manufacturer of electrical devices, including, but not limited to, wiring devices, lighting, data networks, energy management, cable, circuit breakers and electrical vehicle servicing equipment. Leviton engages with numerous suppliers of raw materials, components and finished goods to allow the manufacture and sale of the more than 20,000 products it sells.

Leviton relies on the following policies and processes.
Leviton Code of Conduct
Leviton Supplier Guidelines and MVS-P015 Supplier Manual (English).pdf
Leviton Statement on Conflict Minerals
Leviton California Transparency in Supply Chains Act Statement
Leviton UK's Modern Slavery and Human Trafficking Statement
JCC's Modern Slavery and Human Trafficking Statement
Supply chain and contractor questionnaires
Internal policies and guidelines
Annual Audits of Suppliers
Multiple reporting channels for raising integrity-related concerns including anonymous hotline Report It.
Leviton's view is that the risk of use of child or forced labour could exist at any stage of its vendor supply chain. Human rights criteria are part of the standard review process of Leviton suppliers, and for examining potential mergers and acquisitions. We evaluate and adjust policies and explore available tools as appropriate to help ensure supplier compliance.  Through December 31, 2023, we have, directly or through our Affiliates (as the case may be):  1. Published a Code of Conduct, which prohibits, among other things, forced and child labour.  2. Added a prohibition of forced labour as a non-negotiable term of our supplier and sourcing agreements.  3. Published a California Transparency in Supply Chains Act Statement.  4. Instituted a Conflict Minerals Reporting template for all of our suppliers.  5. Published a Modern Slavery and Human Trafficking Statements in compliance with the UK Modern Slavery Act of 2015.  6. Implemented Supplier Conduct Guidelines which prohibit all suppliers from utilizing forced or child labour and which further obligates suppliers to impose these requirements to all its subcontractors.  7. Created a Supplier Manual which emphasizes Leviton's requirement that its suppliers take efforts to combat forced labour, ensure conflict materials due diligence and reporting and acknowledge Leviton's Code of Conduct.

8. Implemented procedures to conduct periodic audits of suppliers, focusing on, among other things, forced and child labour. We audit between 70-100 suppliers in a typical year and use a nuanced approach by auditing bigger suppliers either in higher risk jurisdictions and/or selling higher risk products/materials.

Leviton has internal reporting and allegation management processes to deal with any alleged violations of Leviton's Code of Conduct, including matters relating to human rights. Our allegation management teams aim to listen attentively and respond swiftly to employee concerns and manage a fair justice adjudication process assigned with our values. In the past year, we received no reports of child labour, forced labour or threats to freedom of association with respect to our employees.

Under our own internal programs, we also cooperate with suppliers on an ongoing basis to ensure that Leviton's products do not contain minerals from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries and CAHRAs.

Leviton requires its suppliers to provide conflict minerals declarations using Conflict Minerals Reporting template. Failing to comply may lead to Leviton's refusal to do business.

## (d) any measures taken to remediate any forced labour or child labour;

Consistent with Leviton's purpose and values, we require our suppliers to work in a way that is ethically, socially, environmentally and economically responsible. What this means in practice is outlined in our Supplier Guidelines.

The Leviton Supplier Guidelines communicates our expectations and performance standards to existing and potential business partners. Adhering to it is part of Leviton's general terms and conditions and therefore a contractual obligation for our suppliers.

In addition to the measures listed in this Section and Section (c) above, Leviton Supply Chain employees receive training on Protecting Human Rights.

Leviton has not received any complaints or other credible evidence of any forced labour or child labour within its Supply Chain and so no remediation was required.

	We remain focused on understanding and limiting Leviton's exposure to conflict minerals, as defined by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. We regularly request supplier information on tin, tungsten, tantalum and gold (which comprise the most prominent conflict minerals, sometimes referred to as "3TG") sourced from conflict-affected and high-risk areas (CAHRAs), as defined under EU Regulation 2017/ 821.  Leviton's efforts to source minerals responsibly are reinforced by the Leviton Statement on Conflict Minerals.
(e) any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains;	If Leviton discovers such loss of income impacts that are directly linked to its business relationships, it will use its influence to encourage suppliers and business partners to respect human rights, whether through collaboration and support, corrective action plans or termination of the business relationship on a caseby-case basis.
(f) the training provided to employees on forced labour and child labour; and	All new hires receive and acknowledge Leviton's Code of Conduct.  Awareness training consists of both an e-learning module available to all Leviton Supply Chain employees and others involved in the procurement of materials or products from suppliers.
(g) how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	Leviton continues to review means for reliably assessing the effectiveness of its programs to prevent forced labour and child labour.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having experienced reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. I further confirm that I have the authority to bind the entity listed above.

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