



How We Work: Ethics and Integrity Guide for Suppliers, Contractors and Consultants

A Message from GE Lighting, a Savant company

Savant Technologies LLC, doing business as GE Lighting, a Savant company (“Lighting”) is committed to integrity. This Ethics and Integrity Guide sets non-negotiable expectations for the behaviors, decisions, and actions of our suppliers, contractors and consultants (collectively “suppliers”). Compliance with legal and regulatory requirements is critical, but it represents only the minimum standards of what we expect.

Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors adhere to the standards of conduct set forth in this Guide and in other contractual obligations to Lighting. Please contact the Lighting manager you work with or Lighting’s Compliance Manager if you have any questions about this Guide or the standards you must meet.

Your Responsibilities as a Lighting Supplier

Safe and Responsible Workplaces

As a Supplier to Lighting, you will: (i) provide a safe and healthy work environment that supports accident prevention; (ii) follow all local health and safety rules, laws, policies and procedures; (iii) comply with applicable environmental laws and regulations; and (iv) minimize harmful impacts to surrounding communities.

Fair Employment Practices

As a Supplier to Lighting, you will: (i) observe applicable laws and regulations governing wages and hours, recruitment, and employment contracts; (ii) support diversity and equal opportunity in the workplace; (iii) allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation; (iv) prohibit discrimination, harassment and retaliation; (v) not charge workers recruitment fees or utilize firms charging workers such fees; (vi) not utilize fraudulent or misleading recruitment practices; (vii) not hold or destroy a worker’s identity or immigration documents; and (viii) provide workers with terms and conditions of employment in a language the worker understands.

Good Citizenship and Human Rights

As a Supplier to Lighting, you will: (i) observe laws and regulations governing working conditions; (ii) support and respect human rights of your employees and others in your business operations and your activities for Lighting; (iii) protect employees from workplace violence or the threat of violence; (iv) not employ workers younger than sixteen (16) years of age or below the applicable minimum age, whichever is higher; (v) avoid complicity in human rights abuses such as forced, prison or indentured labor; workers subject to any form of physical, sexual or psychological compulsion, exploitation or coercion; or trafficking in persons; (vi) adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free; and (vii) provide supporting data on your supply chain for tantalum, tin, tungsten, and gold to Lighting when requested, on a platform to be designated by Lighting.

Gifts, Loans, Entertainment and Improper Payments

As a Supplier to Lighting, you will: (i) maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials, (ii) not offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, offers of employment, or participation in a contest, game or promotion, to any Lighting employee or representative, any Lighting customer or any government official in connection with any Lighting procurement, transaction or business dealing, and (iii) provide supporting data to Lighting when requested.

Competition Requirements

As a Supplier to Lighting, you will: (i) avoid sharing or exchanging any price, cost or other competitive information; (ii) avoid engaging in any collusive conduct with any third party; and (iii) refuse improper competitive information.

Intellectual Property

As a Supplier to Lighting, you will: (i) respect the intellectual and other property rights of Lighting and of third parties, including all patents, trademarks, trade secrets, and copyrights; and (ii) avoid transferring Lighting technical information or intellectual property to any third party without the express written permission of Lighting.

Security and Privacy

As a Supplier to Lighting, you will: (i) respect privacy rights and secure the data of Lighting employees, users, customers, and suppliers (collectively, "Lighting Data"); (ii) implement and maintain physical, organizational and technical measures to ensure the security and confidentiality of Lighting Data to prevent its accidental, unauthorized or unlawful destruction, alteration, modification, loss, misuse, or unlawful processing; (iii) protect your operations and facilities against exploitation by criminal or terrorist individuals and organizations; and (iv) promptly notify Lighting if you have been provided any Lighting data in error.

Trade Controls & Customs Matters

As a Supplier to Lighting, you will: (i) comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services, software, technology or technical data including any restrictions on access or use by unauthorized persons or entities; (ii) screen customers and suppliers to ensure any embargos and economic restrictions are observed; and (iii) provide internally-maintained information about country of origin and commodity classifications to Lighting when requested. .

Management Accountability and Responsibility

As a Supplier to Lighting, you will adopt or establish a management system: (i) that is consistent with this Guide and applicable laws and regulations; (ii) that includes processes to identify and control business ethics, labor, human rights, and legal compliance risks associated with your operations; and (iii) that requires periodic self-assessments of your operations and audits of your supply chain to ensure compliance with this Guide.

Controllership

As a Supplier to Lighting, you will: (i) ensure all invoices and any customs or similar documentation submitted to Lighting or governmental authorities or audited by third parties in connection with transactions involving Lighting accurately describe the goods and services provided or delivered and the price thereof; and (ii) ensure all documents, communications and accounting are accurate and honest.

Report Any Concerns

As a Lighting Supplier you are expected to report any concern related to this Guide as soon as the issue arises, even if the concern does not involve you, as allowed under local laws and any legal restrictions. Lighting Suppliers also must take such steps to assist Lighting in the investigation of any such occurrence.

Prompt reporting is crucial — a question or concern may be raised by a Lighting Supplier as follows:

- By discussing with your Lighting Manager; OR
- By calling the Lighting Hotline: 1-800-248-4212; OR
- By contacting Lighting Ombuds at ombuds.gelighting.com; OR
- By contacting anyone in Lighting’s legal department or its Compliance Manager.

Lighting Policy forbids retaliation against any person reporting such a concern.