

Ethics and Fraud Alert

Observing the rules of business ethics

Observing the rules of ethical behaviour is one of Legrand's fundamental values, along with customer focus, resource development and innovation. These four values are at the heart of the Group's identity and are fundamental for long-lasting profitable development.

Based on this identity, Legrand is committed to preventing corruption and fraud, and observing the rules of competition.

The Group also organises itself to avoid conflicts of interest and fights against embargoes, money laundering, and the funding of terrorism. On the one hand by raising awareness and training its teams, and on the other hand by closely monitoring that its compliance programme is properly implemented.

An ethics alert system

An ethics alert system is in operation, which is accessible to all Group stakeholders in the event of problems involving accounting and/or financial matters, corruption, competition law, serious damage to the environment or the safety of people, unethical behaviour (discrimination and harassment), data protection, or a conflict of interest. All employees are sent this generic e-mail address: ethics.legrand@legrandelectric.com.

Protection for whistle-blowers

As specified in the Group's Charter of Fundamental Principles, Legrand provides whistle-blowers with protection against reprisals. This means that no one may suffer reprisals, or threats of reprisals, because they have reported an ethics or fraud issue in good faith.

Strict confidentiality is maintained

Information collected by all recipients of the report and the people concerned remain strictly confidential.

Fields covered by the ethics and fraud alert

The notion of ethics and fraud alert covers, in particular:

1. Compliance in business relations with our stakeholders:

- Compliance with competition rules;
- Good business practices, particularly in the fight against corruption;
- Prevention of money laundering and compliance with economic and financial sanctions;
- Fraud risk management.

2. Ethical behaviour in work relations:

- Fight against child labour;
- Fight against forced labour;
- Guarantee of freedom of association;
- Respect for decent working conditions;

- Combating discrimination and harassment at work;
- Guarantee of safety and health at work.

3. Serious environmental damage:

For example, emissions or pollution of soil, air and water, illegal dumping of waste, etc.

Data protection

The Group ethics and fraud alert system was reported to the French data protection authority, CNIL.

Any abuse of the system will lead to disciplinary sanctions, in addition to legal proceedings. Conversely, use of the system in good faith will not result in any disciplinary sanction or discrimination against the author of an alert, even if the facts are subsequently found to be inexact, or no further action is deemed to be necessary.

The aim of the system is to make the process easier for whistle-blowers, but its use remains voluntary.

For processing and verification purposes, any data contained in the alert may be transferred to a non-member state of the European Community, within the framework of the Group's Binding Corporate Rules.

Anyone involved in an alert has a right to access and correct data concerning them.

Business ethics awareness and training

Observing ethical rules requires prior, specific and strong awareness raising on such topics.

It is therefore essential to provide ongoing training for employees. The aim of Legrand's training programmes is to ensure that employees likely to encounter risky situations will be thoroughly familiar with the rules of business ethics.

This also reduces the likelihood of competition law, anti-corruption laws, and anti-money laundering or export control regulations being breached in all of the Group's subsidiaries and entities.

Any infraction of Legrand's rules of ethics by an employee shall give rise to immediate sanctions.

Appropriate training tools

Business ethics training sessions are regularly organised for Group employees. The purpose is to help them detect and manage potentially sensitive situations relating to ethical problems in their entities.

Webcasts on various topics related to business ethics are also produced regularly for Ethics Officers, Compliance Officers, and various central functions of the Group.

Moreover, staff who are considered to be at risk must take an online training module on corruption prevention, supplemented by local training sessions. Communication tools (practical guides, presentations) have also been made available to ethics officers and compliance officers to facilitate their work in those areas.