

Statement of principles regarding respect for human rights and the environment

Our responsibility

As a company acting on an international level, TRILUX feels a special responsibility to improve the human rights situation in its own business area and along our supply chains, to shape it socially and at the same time to contribute to the protection of the environment and climate.

Area of application

TRILUX expects all locations, the management, all employees, business partners and suppliers to comply with our declaration of principles. This applies to all companies in the TRILUX Group. Every employee, especially the management, is responsible for implementing these principles on a daily basis. Human Rights Officers and the Head of Sustainability, supported by Compliance, HR, Occupational Safety, Purchasing and Quality Management, coordinate the human rights and environmental due diligence processes. The TRILUX Supplier Code of Conduct specifies these requirements for all business partners.

Due diligence obligations and measures

Compliance with the law and the application of due diligence obligations has been an integral part of our corporate governance since before the German Supply Chain Due Diligence

Act (LkSG) came into force. We are constantly working on improving our processes. TRILUX-managed sites have signed up to the industry-wide [ZVEI-VDMA Code of Conduct](#), integrating sustainability and business ethics into their business model. We always base our actions on the values and principles set out in the ZVEI-VDMA Code of Conduct, the principles of the [United Nations Universal Declaration of Human Rights](#), the [OECD Guidelines for Multinational Enterprises](#), the [core labour standards of the International Labour Organization \(ILO\)](#) and the [United Nations Guiding Principles on Business and Human Rights](#).

TRILUX is committed to respecting internationally recognised human rights, promoting fair working conditions and preventing child labour. We stand up for equal rights, without discrimination on the basis of gender, origin, race, language, faith or disability. Not only does our responsibility include compliance with the law, but it also entails respectful treatment of employees and business partners. In addition, TRILUX is committed to social responsibility beyond its own company boundaries in all regions in which we operate. We pursue our sustainability vision:

“Responsible use of resources and creation of high-quality living and working environments. As a pioneer in the industry, we are taking bold and creative steps forward.”

To achieve this, we are committed to reducing greenhouse gas emissions at all our main locations, based on the reduction targets of the “Science Based Targets initiative”. We align our actions with Sustainable Development Goal (SDG) 13: Climate Action and the standards of the OECD Guidelines/COP21. Furthermore, one of TRILUX’s key goals is to improve material efficiency in our products.

Processes for safeguarding human rights and the environment

Risk management and risk analysis

TRILUX operates a company-wide risk management system that is based on internationally recognised norms and standards. This system takes into account various risks, including those in the supply chain, and aims to identify and analyse violations of environmental regulations and human rights at an early stage.

Regular geopolitical risk assessments based on supplier information such as location, country, industry sector and defined criteria help us to address global and industry-specific environmental and social risks (e.g. air quality, child labour) in our area of business and in the supply chain. Based on the risk-based selection, we carry out a direct assessment with a significant number of suppliers. Depending on their assessed risk, suppliers are required to answer specific questions and provide evidence in order to verify compliance with our Supplier Code of Conduct. The risk analysis carried out in 2023 has identified various risks. In terms of social risks, countries such as India, China, Egypt, the Philippines and Arab countries show high risk scores. In addition to India and China, countries such as Poland and Bulgaria have high environmental risks. Depending on the risk assessment, we request targeted questionnaires and documents in order to obtain further clarification. Affected suppliers receive recommendations on corrective actions, which are subsequently reviewed.

Preventive and corrective actions, complaint procedures

Our employees and business partners receive consistent training, and company-wide guidelines, policies and the Supplier Code of Conduct for Business Partners provide guidance and require compliance. In the event of non-compliance, we take appropriate corrective action.

Both internal and external persons can use a whistleblower system at <https://trilux-en.trusty.report/> to report human rights and environmental complaints, risks and violations without fear of personal reprisal. Reports are processed and evaluated by impartial experts. Identified violations are immediately addressed and preventive measures are taken to avoid future risks.

Our corporate philosophy

Our commitment to human rights and environmental protection is an integral part of our corporate philosophy. We are committed to take our responsibility seriously and to continually improve in order to make a positive contribution to society and the environment.

Management of the TRILUX Group, December 2023