



Signify Forced and Child Labor Due Diligence Statement

May 2024-2025



In accordance with the United Kingdom (UK) Modern Slavery Act 2015 and Canada Bill S-211, *An Act to enact the Fighting Against Forced Labor and Child Labor in Supply Chains Act* (“*Canadian Modern Slavery Act*”), Signify N.V and affiliates including the reporting entities below (“Signify Group”) declares the steps taken up to the end of fiscal year 2024 to identify, assess and manage risks related to forced and child labor within its own operations and supply chain.

1. Reporting entities

This statement is a joint statement of the following entities pursuant with the Canadian Modern Slavery Act:

- Signify Canada Ltd. (“Signify Canada”)
- Cooper Lighting Canada Limited (“Cooper Canada”)

2. Structure, operations, and supply chain

Signify Canada and Cooper Canada are both federal corporations incorporated in accordance with the *Canada Business Corporations Act* with registered office address at Hillmount Road, Markham ON L6C 2S3, Canada.

Own operations

Signify Canada provides professional customers and consumers with quality lighting products, systems, and services in Canada. Its connected lighting offers to bring light and the data they collect to devices, places, and people - redefining what light can do and how people use it.

Cooper Canada delivers an industry-leading portfolio of residential, sports, infrastructure, industrial, and commercial LED lighting, lighting controls, and smart lighting systems in Canada.

Supply Chain

Supply chain includes suppliers of goods and services that contribute to your production of goods produced, sold, distributed, or imported, from sourcing the raw materials to the final product. Our suppliers are crucial partners in the operation and success of our business. We have a direct business relationship with more than 3,000 product and component suppliers mostly based in China, followed by Mexico and India. Signify Group has developed programs over the years to prevent human rights violations including forced and child labor in its supply chain (see Chapter 4 for more information).



3. Risk of Modern Slavery, Forced and Child Labor

The assurance of freely chosen employment in our supply chain is a key element of our sustainability objectives. The electronic sector is recognized as a high-risk industry under the Global Slavery Index. Signify Group's suppliers or manufacturers who provide products or parts are based in high-risk countries¹, we follow a risk-based approach to monitor on the ground, mitigate and remediate human rights risks including forced and child labor. Find more information on our program in section 4 (C).

In addition, Signify Group's portfolio of products includes raw materials such as tin, tungsten, titanium, and gold (3TG) that originate from conflict-affected and high-risk areas (CAHRAs). To address this potential risk, we have implemented a conflict minerals due diligence program in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Refer to section 4 (d) of this statement for more details on our risk response.

4. Signify Group's Forced and Child Labor Due Diligence System

a. Policies and Due Diligence Procedures

Signify Group is committed to respecting and supporting human rights worldwide wherever we operate. We strive to prevent, minimize and, if necessary, address any negative impacts that may arise from our operations, business relationships, supply chains, and products.

Upholding human rights is fundamental to our responsibility, and our [Human Rights Policy](#) and [Integrity Code](#) outlines our commitment. This policy serves as the overarching framework for our engagement on human rights, including our response to modern slavery risks and impacts.

In addition, Signify Group has a zero-tolerance policy against forced and child Labor as prohibited by international standards and relevant national laws and regulations in all stages of our global operations and supply chain.

Signify Group is a member of the Responsible Business Alliance (RBA), a nonprofit coalition of electronics companies committed to (1) supporting the rights and well-being of workers and communities engaged in the global electronics supply chain, and (2) environmental and social responsibility.

For its supply chain, Signify Group adopted the RBA Code of Conduct and included the requirements of the code as part of our supplier contracts within the Signify Supplier

¹ Based on the SA8000 country list: [full country list for SA8000 2015.xlsx](#)



Sustainability Declaration (Declaration). Signify Group suppliers must adhere to the Declaration and deploy it upstream to their suppliers. The full version of the Declaration is available [here](#). The code explicitly states that any type of child and forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons is not permitted at any stage of manufacturing.

Signify Group monitors compliance with its human rights policy and with the Declaration through dedicated audit programs.

Signify also has a dedicated cross-functional team focusing on carrying out due diligence activities related to forced and child labor. The working group consists of employees from legal, supply chain, procurement, and sustainability.

b. [Human Rights in Own Operations \(Signify employees\)](#)

By conventions of the International Labor Organization, Signify Group does not make use of forced, bonded, or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving persons utilizing threat, force, coercion, abduction, or fraud for labor or services.

Signify Group has programs to detect, eliminate, and avoid any use of child labor to manufacture or assemble its products. In this context, a “child” is defined as a person younger than any of the following: the age of 15, the age for completing compulsory education in his/her country, or the minimum age for employment in his/her country. Unless required by local law, Signify Group employees shall not be required to lodge financial deposits or to deposit original government-issued identification, passports or work permits as a condition of employment. Subject to local law requirements, employees will be free to terminate their employment with Signify Group with or without reasonable notice.

The due diligence framework used to test the adherence to Signify Human Rights policy and related commitment is constituted by a Self-Assessment Questionnaire program which is addressed to all the facilities flagged to be in high-risk countries.

A dedicated risk assessment program is conducted to detect the manufacturing locations considered to have an increased likelihood of policy violations. We currently have 19 sites located in “highest or high risk” countries. Since 2017, these locations have been requested to periodically fill in a dedicated self-assessment questionnaire on human rights. In 2023, Signify Group made a profound revision of this assessment program, to ensure that it reflected the latest developments on Human Rights. As a result, Signify Group added 20 new questions and revised the wording of 15, to ensure we covered as many Human Rights risks as possible.



On an annual basis, all the selected facilities must provide this questionnaire answered, and the topics covered are - freely chosen employment, working hours, wages and benefits, child labor avoidance, humane treatment, non-discrimination, freedom of association, integrity code, and business integrity.

On top of this specific program addressed only to selected facilities, a general assessment called ICS (Internal Controls Standard) is addressed worldwide to all the facilities and it's aimed to verify adherence to all the Signify Group policies, this assessment includes several Human Rights areas with severe impact such as: child labor, forced, bonded or indentured labor, modern slavery, or trafficking of persons, working hours, right to organize collective bargaining and remuneration.

At Signify Group, we prioritize transparency and ethical conduct. Our robust policies encourage employees to promptly report any suspected breaches of our Integrity code. Whether it's related to financial misconduct, safety concerns, human rights abuses, or ethical lapses, we want to know. We provide multiple channels for reporting, including direct communication with managers, Compliance Officers, and a confidential Ethics Line. Reports are handled with utmost confidentiality, ensuring fairness and adherence to legal requirements.

We actively encourage external stakeholders to report concerns as well. Our commitment to fostering a culture of accountability benefits everyone involved.

c. Human Rights in Supply Chain (Supplier Sustainability Program)

At Signify Group, we require our suppliers to share their commitment to promoting fair working conditions, environmentally responsible management, and ethical behavior. This includes adhering to our Signify Supplier Sustainability Declaration. The declaration constitutes an integral part of a purchasing agreement between a supplier and Signify. We expect our suppliers to integrate these principles into their internal policies, processes, and procedures, and cascade them out to their subsequent suppliers.

Signify Group engages in a risk-based periodic audit program to verify compliance against our Supplier Sustainability Declaration. Critical or high-risk suppliers are audited by an independent third-party certification body (SGS) and the audit requirements are in line with the Responsible Business Alliance Code of Conduct². The supplier's risk profile is determined by:

- Country in which production sites are located.
- Supplier's maturity level as assessed in the audit.
- Commercial interests: Signify's spend with the supplier.
- Incidents reported to Signify directly or indirectly (e.g. via the media).
- Type of product or service delivered to Signify.

² RBA Code of Conduct v8.0: [RBACodeofConduct8.0](#)



Signify Group also has zero tolerance towards forced, bonded, and child labor. If observed, it must be resolved immediately, given that it could relate to an urgent life-threatening situation or a severe violation of human rights.

In case a supplier is unwilling to follow up or correct the non-conformance, Signify Group will issue a warning letter requesting immediate resolution with a corresponding action plan and inform the supplier about future consequences, which can range from management escalation to holding off new business, and finally, phasing out business entirely. Additionally, we monitor potential risks for forced and child labor via external risk management data including reports from government agencies, NGOs, local custom requirements, vendor reviews against the CBP entity list, and media reports.

d. Responsible Minerals Program

Our commitment to sustainable development compels us to address issues in the extractives sector, even though Signify Group does not directly source minerals from mines or smelters (these companies are typically several tiers removed from our direct suppliers). We recognize that from our position in the supply chain as a downstream company, we can play a role in addressing conflicts, human rights abuses, as well as environmental issues related to the mining of minerals only through a strong multi-stakeholder partnership.

Signify Group fully supports and complies with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We have committed not to purchase raw materials, subassemblies, or products which we know contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country.

We are an active member of the Responsible Mineral Initiative (RMI) which runs an audit program to verify a smelter's conflict-free status and to identify sources of 3TG (Tin, Tungsten, Titanium, and Gold) and cobalt in our supply chain. We use the tools and programs developed by the RMI, especially the Conflict Minerals Reporting Template (CMRT), the Extended Minerals Reporting Template (EMRT), and the Responsible Minerals Assurance Process (RMAP). Each year, we update our list of smelters using the CMRT and/or the EMRT information provided by our Tier 1 suppliers. Find more information on our conflict minerals program and CMRT on our [website](#).

To enhance transparency in the cobalt supply chain, in 2018 we co-founded the Fair Cobalt Alliance (FCA) with Fairphone, Huayou, and Impact Facility. This multi-stakeholder action platform offers actors across the cobalt supply chain a pre-competitive environment for collaboration to help strengthen and professionalize DRC's artisanal cobalt mining sector and contribute to local economic development at large. For more information: [Responsible minerals](#).



e. Supply Chain Security

We have a Supply Chain Security (SCS) Policy in place to secure the goods flow in such a way that tampering, theft, unobserved goods replacement, the addition of unfamiliar goods, human trafficking, or other unauthorized access to the goods flow will be prevented as much as reasonably possible. This includes internal and intercompany transport. Signify Supply Chain Security complies with all applicable rules and regulations related to Supply Chain Security, such as defined by C-TPAT (Customs-Trade Partnership Against Terrorism), EU AEO (Authorized Economic Operator), TAPA, and other governmental security programs based on the World Customs Organization (WCO) SAFE (Scaled Agile Framework) Framework. The SCS Policy is mandatory for all Signify Group locations/entities, Logistics Service Providers, and Finished Goods Suppliers of our Business Groups and Market organizations involved with managing international shipment of Signify Group products. They must comply with SCS requirements.

f. Trainings

Acting with integrity is essential to unlock the extraordinary potential of light for brighter lives and a better world. Respecting human rights is a central foundation of the way we work. Our commitment to respecting and promoting human rights extends beyond our operations, across our wider sphere of influence, including our supply chain. Signify Group has implemented training and a variety of capability-building initiatives to build awareness and help our employees as well as suppliers to comply with our Forced & child labor policy.

Own operations

All Signify employees are requested to state their commitment to the Integrity code after having completed mandatory e-learning modules launched regularly which include respect to human rights. All executives are asked to sign off on the Integrity Code annually to confirm their awareness of and compliance with the code. In addition, all new employees within the procurement organization must undergo a learning pathway on our supplier sustainability program and part of our employee onboarding process.

Specific to the risks of child & forced labor, the Signify forced and child labor working group has developed and executed mandatory training for a selected group of employees. Employees included personnel within our human resources, procurement, supply chain, sales, and management in factories and distribution centers at our Canadian operations.

Supply Chain

All Signify suppliers are encouraged to take part in the training sessions on the RBA Code of Conduct held regularly. These Signify RBA training sessions are organized by Signify and our internal experts provide training to suppliers, which cover various topics relating to the requirements of the RBA Code of Conduct including human trafficking and slavery and can help to further develop supplier sustainability competencies.



5. Effectiveness and Continuous Improvement

Signify Group carries out continuous research and stakeholder engagement activities to identify the most salient ethical and social principles that govern our relationship with stakeholders worldwide.

In 2023, we strengthened our process for the identification of new salient human rights issues, by introducing a quarterly review of the cases raised through our [Ethics line](#) (publicly accessible anonymous reporting tool) with our compliance team. Our Ethics line is a mechanism that allows both our employees and the public to report any potential unethical, illegal, or improper miscounts to us. The quarterly review of the cases raised through our Ethics line, allows us to understand if there are any issues not properly covered by our internal policies and how to drive corrective actions. As a result of this review, we have decided to create a specific Anti-Discrimination and Antiharassment policy in 2024.

In addition, in 2023, we held a meeting with our CEO, to gain his perspective on possible risks in our operations, and to ensure alignment at the highest level of the organization on how to drive Human Rights (including the fight against forced/child labor), in line with EU Taxonomy Minimum Social Safeguards (MSS). In 2023, we also held our annual Human Rights Committee meeting, formed by senior leaders of the company, where the purpose is to make them sign off and agree on corrective actions needed in relation to the main Human Rights topic related.

We also engage with relevant internal stakeholders from procurement, sustainability, and legal to ensure forced and child labor risks are sufficiently identified within our supply chain and any agreed actions are overseen by the relevant team. Our forced labor working group is responsible for implementing due diligence mechanisms including inquiry of Tier 1 suppliers and putting in place upstream traceability of raw materials at risk. In addition, we expect our suppliers to allow all workers the freedom to associate. This includes channels for workers and/or their representatives to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Signify Group commits to continuously improving our due diligence efforts in assessing, monitoring, and mitigating risks of forced and child labor within our operations and supply chain by:

- Increasing our training, and capacity-building activities among employees, suppliers, and business partners on forced & child labor risks.
- Further strengthening our management of forced & child labor risks deeper in our supply chains and facilitating channels of communication.



- Continue to transparently report on our due diligence actions in mitigating and remediating forced & child labor risks in our own operations and supply chains.
- Continue to engage with existing industry programs such as the Responsible Minerals Initiative (RMI) and Responsible Labour Initiative (RLI) to encourage further adoption, improvement, and reliability in relevant programs, tools, and standards.
- Continue to reach out to smelters to encourage their participation in relevant responsible sourcing initiatives. This includes working with direct suppliers to steer towards smelters that are conformant with the Responsible Minerals Assurance Process (RMAP).

6. Internal Accountability

Our commitment to respecting and promoting human rights extends beyond our own operations, across our wider sphere of influence, including our supply chain. Our Human Rights Policy and Supplier Sustainability Declaration are both based on the International Bill of Human Rights, the United Nations Global Compact norms, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Section 1.3 explicitly condemns the use of any form of forced labor. This policy supports our Integrity code, which guides us on how to always act with integrity and sets the standard for how we do business. Our Integrity code also constitutes an integral part of our labor contracts in all countries where Signify Group operates. Failure to act in line with our Integrity code can have serious consequences for Signify Group and the individuals involved. Violations of our Integrity code will result in disciplinary actions, up to and including dismissal. Such violations may also lead to fines and imprisonment for the individuals concerned. Signify Group applies a three-line defense model for business ethics. According to this, responsibility for compliance and business integrity lies with the management of each market, business group, function, department, or site. Confirmation of compliance with the Integrity code is part of the annual Statement on Business Controls when each business unit is required to issue such a Statement as part of a cascading process leading the Board of Management to issue their final statement on the company's annual accounts.



7. Approvals

Signify Canada Ltd.

This Statement has been approved by Signify Canada Ltd., with respect to the financial year ending on 31 December 2024. In accordance with the requirements of the Canada Modern Slavery Act, and particularly section 11 thereof, I attest that I have reviewed the information contained in the report for Signify Canada Ltd. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purpose of the Canada Modern Slavery Act, for the reporting year listed above.

Name: Adam Malolepszy

Title: Director

Date: March 19, 2025

Signature: 

Name: Bryan Charlebois

Title: Director

Date: March 19, 2025

Signature: 

I have the authority to bind Signify Canada. I have the authority to bind Signify Canada.

Cooper Lighting Canada Limited

This Statement has been approved by Cooper Lighting Canada Limited, with respect to the financial year ending on 31 December 2024. In accordance with the requirements of the Canada Modern Slavery Act, and particularly section 11 thereof, I attest that I have reviewed the information contained in the report for Cooper Lighting Canada Limited. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Canada Modern Slavery Act, for the reporting year listed above.

Name: XINYONG (Tracy) Chu

Title: Director

Date: March 19, 2025

Signature: 

Name: Mike Milev

Title: Director

Date: March 19, 2025

Signature: 

I have the authority to bind Cooper Canada. I have the authority to bind Cooper Canada.

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