

**Panasonic Lighting Europe GmbH**  
**Slavery and Human Trafficking Statement**  
**Fiscal Year ended 31 March, 2016**

**Introduction from the CEO of Panasonic Lighting Europe GmbH:**

Modern Slavery is a criminal offence under the Modern Slavery Act 2015. Modern Slavery can occur in various forms including servitude, forced or compulsory labour and human trafficking, all of which include the deprivation of a person's (an adult or a child's) liberty by another (collectively "Modern Slavery"). This document sets out the procedures Panasonic Lighting Europe GmbH has put in place with the aim of preventing opportunities for Modern Slavery to occur within our business or supply chain.

Panasonic Lighting Europe Ltd GmbH ("We" "Us" or "Our") is committed to a work environment that is free from Modern Slavery in accordance with the laws and regulations of the respective countries in which we operate.

We operate a zero-tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own business or in any of our supply chains. We will not knowingly use Modern Slavery in any of our products and/or services supplied, nor will we accept commodities, products and/or services from suppliers that we believe to engage in acts of Modern Slavery.

**Organisations Structure:**

Our ultimate parent company is Panasonic Corporation whose head office is in Japan. Panasonic's business as a whole is as a manufacturer and seller of commercial and consumer electronic products and associated services operating in the consumer and business sectors.

**Our Business:**

Panasonic's global business is organised into four key business units:

- Appliances;
- Eco Solutions;
- AVC Networks; and
- Automotive & Industrial Systems.

Panasonic Lighting Europe GmbH is a holding company for European and non-european manufacturing- and sales-companies and predominately manufactures and sells products to European and non-european businesses and consumers.

**Our Supply Chain:**

Our supply chains include the sourcing of raw materials and minerals principally related to the provision and manufacture of electrical products.

## Our key risk areas

The risk that Modern Slavery will occur is thought to be especially high in certain regions of the world. Panasonic is actively implementing a programme of enhanced checks in these regions to ensure compliance with local legislation.

### Due Diligence Process for Human Trafficking and Slavery:

As part of our initiative to identify and mitigate risk we have taken a number of actions to verify the absence of Modern Slavery in our supply chain, including the following:

- **POLICY** - We have in place an Anti-Slavery and Human Trafficking policy which reflects our commitment to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our supply chains.
- **CODE OF CONDUCT** - This includes requirements on ensuring respect for human rights and that Panasonic will not employ people against their will.  
<http://www.panasonic.com/global/corporate/management/code-of-conduct/list.html>
- **SUPPLIERS** – We expect that all those in our supply chain as well as contractors comply with our Anti-Slavery and Human Trafficking policy, our business principles and Basic Business Philosophy. We also ask our suppliers to meet our Corporate Social Responsibility (“CSR”) requirements, including safeguarding human rights and the health and safety of labourers.  
<https://www.vossloh-schwabe.com/en/home/information/gtb.html>
- **CONTRACTS** – Our policy is to include clauses on Anti-Slavery and Human Trafficking in our standard purchase agreements and we are striving to include these clauses in all our purchasing contracts. Within these clauses, Suppliers are also expected to comply with our Anti-Slavery policy and to provide evidence of their compliance when requested.
- **TRAINING** - We conduct training for all new, permanent staff on our Basic Business Philosophy and Code of Conduct. This includes training on: contribution to society, compliance with local laws and a respect for basic human rights with emphasis on not employing persons against their will and on compliance with local employment laws.
- **RECRUITMENT** – We have strict recruitment policies and comply with the laws and regulations of the respective countries in which we operate. Our self-assessment checklist includes: checking whether we are confirming ages in order to prevent child labour; not allowing temp agencies to collect fees or retain workers' passports or identification documents; and providing workers with employment contracts, including terms of employment in those workers' native languages.
- **SUPPLIER CSR SELF CHECK QUESTIONNAIRE** - Panasonic is in the process of formulating and testing tools which will allow us to measure the degree to which our suppliers comply with our CSR principles in our supply chain. This includes issues concerning Modern Slavery and Human Trafficking and requires suppliers to complete a self-assessment questionnaire on their compliance with CSR and Modern Slavery principles. Panasonic Corporation's global procurement team have already circulated the

self-assessment questionnaire to around 700 suppliers in Japan, China and other countries throughout Asia.

- **CONFIDENTIAL WHISTLE-BLOWING** – We protect whistle blowers by providing an anonymous whistle-blowing hotline for employees which is run by an independent third party. Employees are regularly reminded of the whistle-blowing hotline and are encouraged to use it if they suspect any potentially illegal behaviour or practice.
- **COMPLIANCE TEAM** - We have a dedicated compliance team, which consists of involvement from the following departments:
  - Legal
  - Audit and compliance; and
  - Human resources.

**Plans for the future and continuous improvement:**

We have expressed our commitment towards better understanding our supply chains and working towards greater transparency and responsibility towards people working in them.

We will continue to work with our suppliers to encourage commitment to and compliance with Anti-Slavery and Human Trafficking policies and legislation. We plan to action the following over the coming years:

- **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**- We will implement a European wide policy specific to Anti-Slavery and Human Trafficking.
- **STANDARD CLAUSES** - We are continuing to work on including clauses on Anti-Slavery and Human Trafficking in our current and new purchase agreements to assist in ensuring our suppliers comply with our Anti-Slavery and Human Trafficking policy and to provide evidence of their compliance when requested.
- **SUPPLIER CSR SELF CHECK QUESTIONNAIRE** – We have begun to circulate a CSR check questionnaire to our suppliers to ensure compliance with our CSR core values and policies on anti Modern Slavery. We will continue to circulate this questionnaire to help ensure compliance. Once our suppliers have responded we will evaluate their compliance with anti-slavery and human trafficking laws and our CSR policies and assess how we can achieve continuous improvement in the coming years.

Signed  .....

**Setsuo Mizusawa**

**CEO of Panasonic Lighting Europe GmbH**