

Panasonic Lighting Europe GmbH
Slavery and Human Trafficking Statement
Fiscal Year ended 31 March, 2017

Introduction from the Managing Director 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 child's) liberty by another (collectively "Modern Slavery"). Panasonic Lighting Europe GmbH published its first Slavery and Human Trafficking Statement in September 2016. This is the second statement that further 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 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 which we operate in.

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 applying 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 know are engaged in acts of Modern Slavery.

Organisational Structure:

Our ultimate parent company is Panasonic Corporation whose head office is in Japan. Panasonic is one of the largest electronics manufacturers with 496 consolidated companies located globally.

Our Business:

Panasonic is committed to creating a better life and a better world, continuously contributing to the evolution of society and to the happiness of the people around the world.

Panasonic business is very diverse and covers Consumer Electronics, Housing, Automotive and Business Systems and Solutions. The Panasonic group has net sales of 7,343.7 billion yen (as of 31 March 2017). Panasonic's global business is organised into four key business units:

- Appliances;
- Eco Solutions;
- Connected Solutions; and
- Automotive & Industrial Systems.

Panasonic Lighting Europe GmbH is a holding company for European and non-European manufacturing and sales companies and is responsible for the global development of the business area "Lighting Solutions".

Our Supply Chain:

Panasonic Lighting Europe GmbH has a large number of suppliers globally.

Our key risk areas:

The risk that Modern Slavery will occur is thought to be especially high in certain regions of the world, with Asia being of particular attention for us. We are also aware there are greater human rights and labour related risks in areas where migrant foreign workers are widely employed.

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:

- **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 business principles.
- **CONTRACTS** – Our policy is to include clauses on Anti-Slavery and Human Trafficking in our standard purchase agreements and we are proceeding to include these clauses in all our purchasing contracts.
- **TRAINING** – We conduct training for all new, permanent staff on our business principles and Code of Conduct. This includes training on: contribution to society, compliance with local laws and a respect for basic human rights.
- **RECRUITMENT** – When recruiting employees, Panasonic Lighting Europe GmbH adopts a perspective of protecting fundamental human rights and engages in recruitment activities that comply with the laws and regulations of the respective countries in which we operate. Panasonic Lighting Europe GmbH prohibits forced labour including child labour. In order to prevent child labour, we have included the date of birth to the personnel data when individuals join the company. Furthermore Panasonic Lighting Europe GmbH is conducting Global Human Rights and Labor Policies Self Checks to ensure compliance with the fundamental human rights. The company does not allow employees under the age of 18 to engage in overtime work and heavy labour, and offers them consideration and support including, as appropriate, the opportunity to receive education.

- **SUPPLIER SURVEYS** – Panasonic Lighting Europe GmbH has implemented a manufacturer self-assessment questionnaire for new suppliers, which includes the compliance with the Ten Principles of the UN Global Compact.
- **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
 - Human resources.

Plans for the future and continuous improvement:

We are aware that there are serious human rights and labour-related risks in some parts of the supply chain, notably in high risk areas. With the complexity of the supply chain, it takes time and effort to ensure our suppliers are free from Modern Slavery. We therefore endeavour to tackle Modern Slavery issues as a continuous process.

We have expressed our commitment towards better understanding our supply chains and working towards greater transparency and responsibility concerning 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:

- **STANDARD CLAUSES** – We are continuing to work on including clauses in Anti-Slavery and Human Trafficking in our purchase agreements to assist in ensuring our suppliers comply with the Panasonic Code of Conduct.

Signed 

Klaus Breisch

Managing Director