

Lumileds position on responsible sourcing in relation to Conflict Minerals

1. Introduction

Our commitment to sustainable development compels us to address issues in the extractives sector, even though Lumileds does not directly source minerals from mines or smelters (these companies are typically several tiers removed from our direct suppliers). The U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 defines conflict minerals as cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, or any other minerals or their derivatives determined by the Secretary of State to be financing conflict in the Covered Countries.

2. OECD guidance and due diligence

Lumileds fully supports 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 supplies which we know contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country.

Lumileds supports the Conflict Free Sourcing Initiative, which seeks to prevent minerals that directly or indirectly finance the DRC conflict from entering the electronics supply chain. This group has developed tools to increase transparency of the origin of conflict minerals, including an electronic due-diligence tool for companies and the Conflict Free Smelter (CFS) program to audit smelters, which are a key element in the supply chain for determining the origin of the relevant minerals. These tools are consistent with the OECD guidance.

In following the OECD due diligence guidance and using these CFSI tools, we request our suppliers to conduct investigation in their supply chain to determine the origin of the metals provided to Lumileds by identifying the smelters and share all the smelter names to us. The result of this due diligence is a list of smelters. Lumileds requires all smelters and refiners of tin, tantalum, tungsten and gold identified in Lumileds supply chain to participate in independent third-party conflict minerals audit programs. The Lumileds Conflict Minerals Reporting Template data is published on our website.

Lumileds recognizes the need to start systematically addressing all extractives related issues worldwide, e.g. human rights abuses incl. child labor, health & safety and environmental issues while making sure not to create de facto embargoes by enabling responsible sourcing in the affected regions.

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