

COMMITMENT BY LEGRAND NORTH & CENTRAL AMERICA (“LNCA”)

Complying with the rules of business ethics is one of the fundamental principles of Legrand's corporate social responsibility.

These four pillars are the core areas of compliance:

- Anti-corruption,
- Embargoes,
- Fraud Awareness,
- Fair Competition

Beyond my own personal commitment to these issues, I fully endorse the delivery of our compliance training program covering these topics. Compliance training is essential for raising awareness and the understanding of these 4 pillars is critical for my Staff and the organization. This training will reinforce Group's compliance standards through our own internal practices and procedures, making compliance part of our culture.

I commit to fully supporting the education of associates on the compliance-related rules and procedures that are relevant to their jobs, so they are informed of the risks to which they may expose themselves or Legrand.

I will do everything I can to increase awareness of the Group's charters, procedures, and good practice guides that are accessible on the DIALEG home page, in a section titled, “Compliance.” These resources are supplemented locally by our own internal procedures and training materials.

Employees may consult with their Compliance Officer, HR Representative, direct manager, or the Legal Department to clarify any questions regarding compliance, to resolve any doubts, or ask any questions they may have about compliance at Legrand. Employees are also informed that anonymous reporting of ethics / compliance violations can also be done through legrand.signalement.net.

It is the responsibility of each individual working at Legrand North and Central America to be vigilant and proactive in meeting our compliance requirements.

I thank you all for joining me in this commitment.

A handwritten signature in black ink, appearing to read 'Brian DiBella'.

Brian DiBella
President & CEO, Legrand, North and Central America

KNOW YOUR RESPONSIBILITIES REGARDING

Legrand's Business Ethics & Compliance Program

Legrand Group's Compliance Program, launched in 2013, focuses on four pillars and is one of the fundamental principles of LNCA's corporate social responsibility framework.

Legrand's employees and supplier partners are expected to be familiar with the tenets of this program and to be vigilant and active in complying with them.

Employees, suppliers and customers are encouraged to report illegal or unethical behavior by emailing ethics.legrand@legrandelectric.com.

CORRUPTION

Corruption is a form of dishonesty undertaken by a person in a position of authority, often to acquire personal benefit.

- Avoid any practice of offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence the actions of another party
- Accepting gifts, entertainment, and other business courtesies can create the appearance of a conflict of interest. Report all gifts, meals, travel and entertainment received from customers or competitors valued in excess of \$100.
- To avoid misunderstandings, ensure business meals are reasonable and proportionate to the size of the business account
- Document all discounts and rebates offered
- Never indulge in payments that are or could be interpreted as bribes, even if they are customary in the country where business is being conducted.



FRAUD

An intentional act involving the use of deception to obtain an unjust or illegal advantage.

- Avoid any act or omission or misrepresentation that knowingly misleads in order to obtain a financial or other benefit
- Fraud (via forging of documents or forgeries of any kind) and money laundering are strictly prohibited
- Ensure all travel expenses are authorized. Ensure expenses are reasonable, directly related to company business, and supported by appropriate documentation.
- Never collude with external third parties attempting to illegally gain possession of Legrand's assets, either financial or intellectual property



EMBARGOES

The United Nations Security Council, the U.S. government and the European Union impose financial and economic sanctions on certain individuals, companies and countries.

- Avoid conducting business with entities in countries that are subject to financial and economic sanctions
- Before conducting business with a customer in a new country, check if the country is on Legrand Group's embargo list



COMPETITION

Any violation of competition law (antitrust), whether voluntary or involuntary, has the effect of altering or reducing competition in a given market and is prohibited.

- Avoid agreements with competitors regarding pricing or markets.
- Avoid exchanging information with competitors
- Avoid exclusive distributorship agreements, when possible

