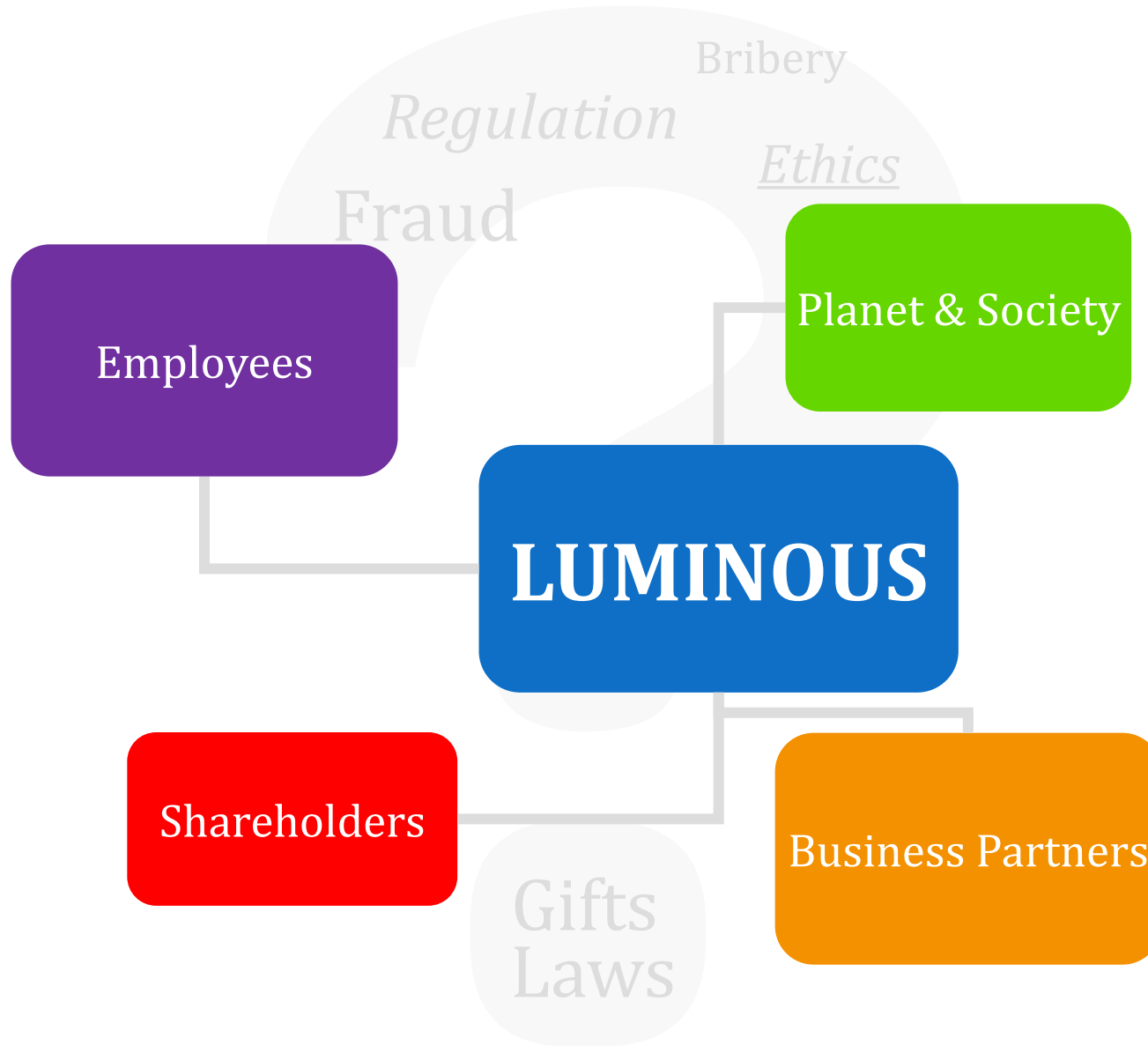


Our Principles of Responsibility

Common principles for legal, Ethical and responsible behaviours

For all employees





Have you already faced one of these situations?...

- I heard information from a competitor that I was not supposed to have...
- One supplier offers me a very significant gift one day before a decision in a competition where he is involved ...
- I can improve my productivity but deteriorating the environment around my facility...

What
should I do?

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Refer to
*Our Principles of
Responsibility*

Our Principles of Responsibility has been drawn up based on the major principles Schneider Electric subscribes to Global Compact ,Organization for Economic Cooperation and Development, Human Rights, and the International Labor Organization.

“ ... we insist on the importance of responsibility and its place at the core of our corporate governance.” **Jean-Pascal Tricoire, Chairman of the Management Board and CEO**

- The Organization is committed to adhering to ethical conduct in all of its operations.
- These Principles of Responsibility discuss the legal and ethical principles that must guide all the employee in the work.
- It is not intended to cover every ethical issue, but to give general guidance in case of doubt or uncertainty of what actions to take.
- These principles apply to all the employee of Luminous.



Towards Employees

The Organization commits toward its employees, who constitute its main asset, to the following:

- ❑ To define, update and cause all its entities to apply human resources policies.
- ❑ To promote equal opportunities for all according to his/her skills in terms of employment, hiring, mobility, training, compensation and occupational health, without discrimination (race, color, age, gender, sexual orientation, origin, disability, trade-union, political opinion or religious belief).
- ❑ To promote good faith consultation with employees 'representatives following local procedures and labor laws.
- ❑ To ensure proper and safe working conditions, improvement of people's health respecting the definition given by World Health Organization.
- ❑ To ensure whenever possible, that in all countries where the organization is active, employees receive benefits for work-related accidents, sickness and disablement cover.
- ❑ To ensure development of competencies and employability.
- ❑ To involve employees in the life of the Company by providing regular information, especially on challenges and targets.
- ❑ To maintain as confidential any personal information regarding its employees and to strictly limit any disclosure in accordance with laws.



Towards Employees

Employees commit to respecting and implementing the following principles:

- ❑ They pay attention to principles of equality of treatment and respect of individuals in their relations with their direct reports, their fellow employees, their managers, customers and suppliers.
- ❑ They are totally loyal to the Company. It is forbidden, without permission from the Company, to render assistance or to be employed by a competitor. Moreover, employees must refrain from external commitments which may interfere with their availability for the Company.
- ❑ They must not accept any remuneration from any organization or business concern which has a present business relationship or conflict with the organization. Without written agreement of one's superior, employees cannot influence the decision-making regarding the business relation between organization and a company employing a member of their family. Expenses claimed from the Company can only be related to activities performed for the Company and according to the guidelines.
- ❑ They must refrain from engaging in activities and relationships that conflict with the interest of the Company or reflect adversely upon it or that deprive the Company of the full measure of the employee's working time and attention to assigned duties.
- ❑ They should not involve Organization in their personal convictions and beliefs.



Toward business partners

With its customers, the Company commits to:

- Put forth its best efforts to increase customer performance.
- Anticipate and take into account customer expectations.
- Act with integrity and respect in all business dealings.
- Abide by its on-time delivery and safety commitments.
- Improve its products, services, and technology in order to support customers and increase the customers' satisfaction.
- Respect the principles of free competition and open economy.

The Company's employees are committed to being partners in their customers' performance.

Customer satisfaction is the Company's top priority.



Toward business partners

The company's suppliers share its commitment to customer satisfaction:

Innovation to gain competitiveness, globalization to benefit from volume effect and localization to act closer to the final customer are elements of the strategy of the organization that it wishes to share with its suppliers.

Toward business partners



With its suppliers, the Company commits to the following principles:

Act with integrity and establish fair contractual relations.

Promote the commitments included in "The Global Compact" pertaining to human rights, labour standards, environment and anti-corruption.

Qualify in priority suppliers those who promote social and environmental responsibility.

The company reserves the right to implement any necessary actions to verify that its suppliers will comply with all laws and regulations in force as well as all their contractual commitments.

The 10 commitments of The Global Compact are: -----

Human Rights:

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Make sure that they are not complicit in human rights abuses.

Labour Standards:

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination at all forms at forced and compulsory labour.

Principle 5: The effective abolition of child labour.

The employees are committed to implementing the following principles of integrity and fairness:

- ❑ Apply Company's Supply & Quality Management procedures.
- ❑ They will have probity relationships with the Company's suppliers. They must be motivated solely to achieve business transactions in terms most favorable to the Company.
- ❑ They and any member of their family must not receive any personal benefit, financial or non financial (gift or other entertainment). beyond a nominal value from a supplier.
- ❑ They should seek management approval before accepting or giving any gift, meal or other entertainment (except for non-substantial gifts consistent with local practice) as part of a business relationship.
- ❑ Employees will not to take into account their personal interest, direct or indirect, in choosing a supplier.

Principle 6: The elimination of discrimination in respect of employment and occupation.

Environment:

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption:

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.



Toward shareholders

The organization commits to its shareholder to:

Develop the Company's value. Respect governance principles based on separation of control and operations within the framework of a publicly listed company with supervisory and management boards.

See to equality among shareholders.

Give shareholders, as well as the financial markets, precise, fair, and accurate information, in line with rules applicable to publicly listed companies.

The organization belongs to its shareholders.



Toward planet and society

The Organization commits to acting in line with principles of sustainable development, in full respect of current and future generations, cultural diversity and country legal systems where the Group is settled:

- ❑ Listen to society and its evolutions to better fulfill its needs.
- ❑ Participate in local community activities at all sites where the Company is present.
- ❑ Take into account environmental protection in its strategic decisions and in its conception, production, distribution and recycling processes
- ❑ Market safe products that provide a safe environment and optimize energy consumption as well as natural resources.
- ❑ Communicate accurately and fairly to the various stakeholders regarding the consequences of the Company's activity concerning the environment.
- ❑ Apply laws and regulations related to activities performed and responsibilities exercised by the Group.

- ❑ All employees must promote honest and liable conduct.
- ❑ Company commits to deploying these principles of responsibility. Any employee not respecting these principles may incur sanctions within the local practice and the legal system in place in each country.
- ❑ The implementation of these principles can require particular explanations. Employees in need of further clarification can ask their management, a member of human resources, the financial and/or legal department or the compliance officer of Company.
- ❑ Employees aware of serious breach to these principles should report such activities immediately.
- ❑ Employees who make credible reports will be protected from retaliation. The information received will be treated on a confidential basis to the extent possible.

