Anti-Slavery And Human Trafficking Position Statement Crestron Electronics, Inc.

Last updated: 24 June 2022

1. Overview

- 1.1 This statement is made by Crestron Electronics Inc. on behalf of itself and its subsidiaries and affiliates, (collectively, "Crestron") with reference to: (a) the California Transparency in Supply Chains Act 2010 (United States); (b) the Modern Slavery Act 2015 (United Kingdom); (c) the Modern Slavery Act 2018 (Cth) (Australia); (d) additional anti-slavery and human trafficking laws applicable to each Crestron location; and (e) any successor legislation or regulations applicable thereto. It constitutes Crestron's anti-slavery and human trafficking position statement. It sets out the steps that we have taken and are taking to ensure that slavery and human trafficking are not taking place in our supply chain or in any part of our business.
- **1.2** Crestron will not tolerate human trafficking or slavery in its operations or its suppliers' operations. Crestron encourages all of its procurement employees to be vigilant regarding human trafficking and slavery in Crestron's supply chain and to report any suspected human trafficking or slavery to Crestron's General Counsel. Crestron will not retaliate against employees who report suspected human trafficking or slavery in the Crestron supply chain.

2. Our Business

2.1 Crestron is a manufacturer and global distributor of audio, video, control system, lighting, window shading, and unified communication products headquartered in Rockleigh, New Jersey (USA). Crestron Electronics Inc. is the parent company of Crestron Europe BV, Crestron ANZ Pty. Ltd., and Crestron Singapore Pte. Ltd. The registered offices for these companies are as follows:

Crestron Electronics, Inc.

15 Volvo Drive Rockleigh, NJ 07647 USA

Crestron Europe BV

Oude Keerbergsebaan 2, 2820 Rijmenam, Belgium

Crestron ANZ Pty. Ltd.

Level 5, 15 Help Street, Chatswood NSW 2067, Australia

Crestron Singapore Pte. Ltd.

30 Cecil Street #21-05, Prudential Tower Singapore 049712

2.2 Crestron is committed to treating everyone who works at or with Crestron with dignity and respect, and we oppose all forms of modern slavery and human trafficking.



3. Our Supply Chains

- **3.1 Crestron Focus.** Crestron has active relationships with several thousand suppliers globally, including in Europe, the Americas and Asia. While we expect the risk of slavery in our supply chain to be low, we recognize such risks exist for organizations across the globe and we continue to enhance our supply chain selection and management processes with that in mind. Crestron's policies and processes, as a parent company as well as a supplier to its subsidiaries, are fundamental considerations in both its own and its subsidiaries' efforts to identify, tackle, and prevent modern slavery and human trafficking in its global business and supply chain or in any part of our business.
- **3.2 Supplier Adherence to Our Values**. Within the entire Crestron organization, there is zero tolerance for slavery and human trafficking. Crestron performs periodic on-site audits of strategic suppliers. In addition, Crestron performs audits of new suppliers to evaluate risk and fit of these suppliers. Over the years, during the course of Crestron's supplier quality and compliance audit protocols, Crestron has determined that the most significant risk of slavery and human trafficking-to the extent it may exist in its supply chain similar to any other similarly-situated global manufacturer of electronic and electrical components would be China and various parts of Southeast Asia. To assess, manage, and mitigate against such potential risk, Crestron has put in place certain due diligence processes and training programs.
- **3.3 Supplier Code of Conduct**. Crestron's Supplier Code of Conduct reflects our expectation for all suppliers to act with integrity in all business relationships and a commitment toward effective controls to ensure slavery and human trafficking is not taking place in supply chains.

 See https://www.crestron.com/Legal/Supply-Chain-Code-of-Conduct.

4. Policies on Slavery and Human Trafficking

- **4.1 Child Labor**. Crestron will not engage in or support the use of child labor. Suppliers are expected to comply with all applicable local child labor laws and only employ workers that meet the applicable minimum legal age requirement(s) for their location.
- **4.2 Minimum Wages**. Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements.
- **4.3 Forced Labor**. Suppliers shall not use any forced, prison, or indentured labor. Crestron will not engage in or support the use of forced or involuntary labor, and as a result, Crestron will not purchase material or services from a supplier utilizing forced or involuntary labor.
- **4.4 Discrimination**. Crestron supports diversity and equal opportunity in employment. Unlawful discrimination in the workplace is not tolerated. Suppliers are expected to comply with all applicable local laws concerning discrimination in hiring and employment practices.
- **4.5** Anti-Slavery/Human Trafficking. Crestron expects its suppliers to take steps to ensure that slavery and human trafficking in any form does not take place in their business or supply chains and have effective controls to prevent its occurrence.



- **4.6 Conflict Minerals originating from the Democratic Republic of Congo**. Crestron supports ending the violence and human rights violations, including forced and child labor, that are associated with the mining of certain minerals in the Democratic Republic of Congo and surrounding countries.

 See https://www.crestron.com/Legal/Crestron-Conflict-Minerals-Policy.
- **4.7 California (USA) Transparency in Supply Chains**. Crestron has publicly posted on its websites, the steps it has taken in its supply chain to ensure and address that slavery and human trafficking are not taking place in its supply chain or in any part of its business.

See https://www.crestron.com/legal/california transparency supply chain act disclosure.

5. Due Diligence Processes for Slavery and Human Trafficking

- **5.1 Sourcing from Reputable Suppliers.** The vast majority of electrical components are sourced from distributors that are large publicly traded multinational companies, though there are also certain small-to-mid-sized and privately held manufacturers that supply Crestron with components. In addition to Crestron's manual and automated due diligence on these suppliers, Crestron relies on their respective Anti-Slavery and Human Trafficking and other compliance statements/declarations, as endorsed by their executive teams. In addition, Crestron routinely sends out compliance audit questionnaires to its suppliers located in jurisdictions that Crestron considers "high risk" as part of its overall strategic risk assessment.
- **5.2 Sourcing from Suppliers Adopting the Responsible Business Alliance's (RBA) Code of Conduct.** Crestron sources select components from suppliers that participate in third-party verification programs and/or have adopted the RBA's (f/k/a Electronic Industry Citizenship Coalition) Code of Conduct. See https://www.responsiblebusiness.org/code-of-conduct/.
- **5.3** Sourcing from Suppliers Participating in the Responsible Minerals Initiative (RMI). Solder used in Crestron's manufacturing process is purchased from suppliers that participate in the Responsible Minerals Assurance Process (RMAP).

See https://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/.

- **5.4 Requiring Suppliers to Comply with Local Laws**. Crestron's applicable policies, including but not limited to the the Supply Chain Code of Conduct, are incorporated into Crestron's Standard Purchase Order Terms and Conditions for Vendors, negotiated supply agreements, and purchase orders with our direct suppliers. This requires direct suppliers to warrant, for example, that all goods provided under purchase orders have been produced, and all services performed, in compliance with all applicable laws, ordinances, codes, rules, regulations or standards, and those pertaining to the manufacture, labeling, invoicing and sale of such goods or services, environmental protection, immigration, employment and occupational safety and health. See https://www.crestron.com/legal/standard purchase order to for vendors.
- **5.5 Staff Training**. To ensure a continuous level of understanding of the possibility of modern slavery and human trafficking in Crestron's supply chains and business, Crestron has provided training to group employees responsible for product supply chain management on how to identify and respond to supply chain issues, such as human trafficking and slavery.

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