

Zaragoza, January 2019

**Declaration of Zalux S.A. concerning
the U.S. Dodd Frank Act/Conflict Minerals**

Dear Sir or Madam,

the companies of the TRILUX Group have joined the ZVEI Code of Conduct, thereby confirming their social responsibility as part of their global corporate activities. The ZVEI Code of Conduct acts as a guideline in the industry, in particular concerning occupational conditions and social and environmental compatibility. As part of this we also motivate our suppliers to comply with these guidelines. Furthermore, we are also committed to meeting the requirements of customers with issues of conflict materials in supply chains, with reference to the Dodd Frank Act.

Specifically in Germany, Paragraph 7 of the Foreign Trade and Payments Ordinance (AWV) applies, which prohibits us by law with regard to the procurement or supply of goods to issue a boycott declaration to countries or to demand this, and therefore also concerning the procurement of goods from the Congo or its neighboring states. The USA also prohibit boycott declarations in accordance with its Export Administration Rules (USEAR). The Trilux Group manages global procurement for Zalux, therefore the above applies also for Zalux and we are unable to make exclusion declarations concerning the origin of goods, as this would equate to a prohibited boycott declaration.

Zalux, as part of the Trilux Group, takes into consideration the same Corporate Social Responsibility as the Group, being member of the AFME (The association of manufacturers of electrical equipment) in Spain, who has declared its sensitization with the Responsibility of the Companies and its effects on environmental and social wellbeing

We have set up in the Group the following internal compliance measures already within the scope of our business processes and work constantly on the improvement also concerning the issue of Dodd-Frank Act:

- We give focus on the issues of the Dodd franc of Act within the scope of the negotiations with our suppliers;
- We appointed a responsible employee for further measures in connection with Dodd Frank of Act relevant processes;
- Compliance requirements are an essential issue within the scope of internal general and special meetings of the purchase department, so that an exchange of information is guaranteed;
- We raise awareness of our employees to several compliance subjects as well as for compliance in general within the scope of presence trainings, Workshops and E-Learning;
- We have appointed internal compliance consultants;
- Check of the possibilities for the establishment of a web based data bank for material declarations and conflict materials.

We are further able to declare to the best of our knowledge and conscience that no indications exist that our products and those of our suppliers contain conflict raw materials. We will not knowingly use conflict minerals from non-certified systems from the conflict region in our products. We ask for your understanding that we are not permitted to issue more detailed declarations breaching German and U.S. legislation.

Jose Antonio Lopez
Managing Director
Zalux S.A.



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