

Team member  
code of conduct

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Always On

# The Current Way

Stronger  
Together

Current 



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# A Message from Current



At **Current**, we are passionate about lighting and control solutions that produce beautiful, functional, and safe environments for our customers. Our company culture of integrity – a culture that has its roots and heritage in two iconic lighting businesses – is a core component of our success in delivering industry leading products to our customers.

Integrity is a commitment that guides our behaviors beyond mere compliance with laws and regulations. Possessing a strong sense of integrity drives us to make the right choice when faced with any situation wherever we may find ourselves.

**The Current Way** contains the principles that guide and power our business. It is up to each of us to know, understand, and apply these principles in our daily work, regardless of our function or role in the company.

Thank you for your dedication to furthering our success and creating a company for which we all can be proud. As a high integrity team, we are at our best when we do the right thing each day and in every interaction.



# Our Core Values

## Bold in Action

We embrace change and take risks to bring solutions that meet the challenge, move us forward, and make our customers successful.

## Outcome Driven

We deliver on our promises, predicting and removing obstacles to create a clear path to visible results.

## Doing Right

We never compromise when it comes to quality or reliability, and take our responsibilities to our customers, people and the planet seriously.



# Current's Code of Conduct



**The Current Way is a guide of ethics, values, and standards of behavior for all Current employees.**

The Current Way defines acceptable behaviors within the Company that allow us to work effectively as a team in a positive environment. Our Code of Conduct helps each of us to detect and deal with potential integrity challenges that arise during employment.



# Be Engaged

Integrity is everyone’s responsibility. Be engaged and aware of situations that may present an integrity miss for the business. Here’s what you need to know:

You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our integrity principles or policies are not being followed.

Confidentiality is respected and you may even choose to remain anonymous. However, if you identify yourself, we can follow up with you and provide feedback. Your identity and information will only be shared on a “need-to-know” basis. Any retaliation — whether direct or indirect — against employees who raise a concern is grounds for discipline, up to and including dismissal.

## HOW TO RAISE AN INTEGRITY CONCERN

**Current** offers several channels for raising concerns. You can choose to speak to someone about a potential integrity issue or put it in writing. Generally, your supervisor or manager will be in the best position to resolve an integrity concern, but other resources include:

- **Your Human Resources Leader.**
- **Your Compliance Leader.**
- **Company Legal Counsel.**
- **Next level of management.**
- **Your business or Regional Current Ombudsperson.**
- **Current’s Integrity Helpline.**

Nothing in this policy prevents you from reporting potential violations of law to relevant government authorities.



## HOW WE HANDLE INTEGRITY CONCERNS

**Current** takes integrity seriously and will fairly examine every integrity concern. Managers are required to escalate employees’ concerns to leadership.

### During the investigation process, Current:

1. Forms an objective investigation team.
2. Determines the facts through interviews and/or the review of documents.
3. Recommends corrective action, if necessary.
4. Provides the person who raised the original concern (if that person is known) with feedback on the outcome.

## RAISE A CONCERN

### The Current Ombuds Network

The Current Ombuds process allows you to voice your integrity questions and concerns, anonymously if you prefer.

### CURRENT OMBUDS NETWORK CONTACT INFO:

<https://my.currentlighting.com/the-current-way/ombuds-members>

### Report concerns online at:

 <https://currentombuds.ethix360.com/>

 **Or by calling:** 1-833-328-7669

### Reach the Company Compliance Leader at:

 [bobby.simpson@currentlighting.com](mailto:bobby.simpson@currentlighting.com)

# Improper Payments

**Do not permit or engage in bribery or corruption of any kind.**

**Current prohibits bribery** in all business dealings in every country around the world, including when interacting with either governments or the private sector.

**This includes even small facilitation payments** to expedite routine administrative actions.

**You must maintain accurate books, records, and accounts** that correctly reflect the true nature of all transactions.



## WHAT TO LOOK OUT FOR AND KEEP IN MIND

- **Never offer, promise, make, or authorize** a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.
- **Remember that providing gifts, entertainment or anything else of value to government employees** is highly regulated and often prohibited. Do not provide such gifts and entertainment unless you have received prior legal counsel approval.
- **Follow Current’s guidelines** regarding gifts and entertainment and other business courtesies.



- **Never contribute Current’s funds or assets for political purposes** without obtaining prior approval from legal counsel.
- **Treat with extreme caution** a demand from a third party to receive its commission payment prior to winning a deal/contract.
- **Be wary of any suggestion** to direct business through a specific representative or partner due to a “special relationship.”
- **Be suspicious of any request** to make a payment to a person who is not related to the transaction being discussed — or a request that payments be made in another country.
- **Watch out for commissions** that seem too large in relation to the services provided.

## WHAT YOU SHOULD KNOW

**Bribery** means giving, offering or promising anything of value to gain an improper business advantage.

**Facilitation payments** are small amounts paid to government employees to expedite routine clerical or administrative actions such as issuing permits. Such payments are prohibited and if requested please report it to the business Compliance Leader or Ombuds.

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# Supplier Relationships

Work only with suppliers that uphold Current’s values and high integrity standards.

**Current does business only with suppliers that comply with all applicable legal requirements** and Current’s guidelines relating to integrity.

**Current does business only with suppliers that treat workers and others fairly and with respect**, including abiding by laws prohibiting harassment, discrimination, bullying, human trafficking, and child labor.

**Current**, as a business enterprise, **promotes respect for human rights** within our supply chain.

**Current safeguards information**, including confidential and proprietary information and personal data, of both Current and suppliers.

**Current provides suppliers a fair opportunity to earn a share of Current’s purchasing volume**, including small businesses and businesses owned by the disadvantaged, minorities, women, and disabled veterans.

## WHAT TO LOOK OUT FOR AND KEEP IN MIND

- **Follow the procedures** set out in Current’s Supplier Responsibility Guidelines [here](#).
- **Be mindful of diversity** when choosing suppliers.
- **Protect Current’s confidential and proprietary information** including, where appropriate, with a confidentiality agreement. Also do not disclose confidential information or personal data that a supplier provides to **Current**.
- **Avoid potential conflicts of interest** when you select a supplier, and never accept improper gifts or other items of value.
- **Follow government acquisition regulations** when purchasing materials and services for use in fulfilling government contracts.
- **If you observe a suspected human rights violation** in **Current’s** supply chain, raise a concern.
- **Always report issues and concerns regarding supplier relationships**: If you see unsafe conditions in supplier facilities, supplier employees who appear to be underage or subject to coercion, or an apparent disregard of environmental standards in supplier facilities.



## WHAT YOU SHOULD KNOW

**Current’s** reputation for integrity can be significantly affected by those whom we select to act as our suppliers.

The Company maintains robust Supplier Responsibility Guidelines and requires all suppliers to sign a **Supplier Integrity Acknowledgment Form** [here](#) upon engagement by the business.

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# International Trade Compliance

Always know what you’re exporting, its destination, the end user, and the end use. Provide Customs with complete and accurate import documentation.

**Current will comply with all export control, economic sanctions and customs laws** that regulate cross-border transfers of goods and technology, including rules concerning trade prohibitions with State Sponsors of Terrorism (SSTs) and other sanctioned countries that are often stricter than applicable laws.

**Current** does not do business with people or companies identified on government restricted party lists.

## WHAT TO KEEP IN MIND - CUSTOMS

- Only use Current-approved Customs agents.
- Ensure you fully comply with special program requirements before you claim reduced duty rates.
- Report accurate, complete and timely information on import declarations, and provide accurate and complete product descriptions when classifying goods.
- Obtain approval from your Customs team before hand-carrying any commercial product across a border.

## WHAT TO KEEP IN MIND - EXPORTS

- Use the export classification of goods, software or technology to determine if they require government authorization for export.
- Confirm all necessary licenses or authorizations are in place before any export transaction and adhere to all export license or license exception requirements.
- Do not cooperate with any boycott of Israel or any other boycott or restrictive trade practice not authorized by the U.S. government. Seek legal counsel if a restrictive trade practice or boycott appears to conflict with the laws of another country.

## WHAT YOU SHOULD KNOW

**Export control laws** regulate cross- border transfers of goods, software and technology that can be used for military or weapons proliferation purposes. Some countries also control the release of technical data to foreign nationals within their borders.

**Customs laws** regulate the movement (import and export) of goods across national borders or customs territories, even in the absence of a commercial transaction or import duties.

**Sanctions (including embargoes and boycotts)** can restrict trade in some or most goods and services.

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# Anti-Money Laundering

Always know your customer and be alert to possible illegal activity.

**Current** is committed to complying with applicable anti-money laundering (AML), corruption and terrorist financing laws and regulations.

**Current** conducts business only with customers involved in legitimate business activities, with funds derived from legitimate sources. We adhere to risk based “Know Your Customer” due diligence processes on prospective customers.

## WHAT TO LOOK OUT FOR

- Collect and understand documentation about prospective customers, agents and business partners to ensure they are involved in legitimate business activities and that their funds come from legitimate sources.
- Contact Legal Counsel for guidance on collecting and verifying information from our customers and related parties.
- Attempts by a customer to open an account by providing or offering inaccurate or false information.
- Offers to pay in cash or overpayments followed by a request for refund.
- Orders, purchases or payments that are unusual or inconsistent with a customer’s trade or business.
- Unusually complex deal structures.
- Unusual fund transfers to or from countries unrelated to the transaction.
- Transactions that might have been structured to evade recording or reporting requirements.



## WHAT YOU SHOULD KNOW

Money laundering is the process of hiding the proceeds of crime or making the source appear legitimate.

The term “Customer” applies to any party contracted to obtain goods, services, credit or who opens an account.

See the full **Anti-Money Laundering Policy** [here](#).

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# Working with Governments

Never take shortcuts when dealing with government - be transparent and always comply with applicable government protocols and rules.

Current is truthful and accurate when dealing with governments.

Current maintains controls and procedures that target our government business activities specifically to ensure compliance in this highly regulated environment.

## WHAT TO KEEP IN MIND

Government business is different — do not pursue government business without first engaging your Legal Counsel.

Before submitting a proposal to a government, review the requirements with all applicable business stakeholders and only accept those terms with which Current can comply.

Do not accept internal government information about its selection process nor information about a competitor’s proposal unless the government contracting officer has specifically and lawfully authorized its release pursuant to established and written government procedure.

## WHAT TO LOOK OUT FOR

- After a government contract award, perform all contract obligations strictly in accordance with the terms of the agreement. For example, do not make any substitutions for the goods and services to be delivered, or deviate from requirements, without the written approval of the authorized government official.
- Do not offer, promise, make or authorize the giving of anything of value to a government employee.
- Never enter discussions with government employees or people close to them about

prospective employment while they can influence decisions affecting **Current**.

- In the U.S., certain employees must obtain pre-approval to make personal political contributions for compliance with state and local “pay to play” laws. These employees are officers, directors, sales employees and their managers that seek U.S., state or local government contracts. If you are unsure whether you must pre-clear personal political contributions, contact your legal counsel or the Compliance Leader.

## WHAT YOU SHOULD KNOW

**Government Employee and Government Official** mean an employee, official, or an elected or appointed member of an executive, legislative, or administrative body of a federal, national, state, provincial, or local government from any country.

This includes an employee of any public agency/ department, state instrumentality, or State-owned or State-controlled enterprise. Outside the U.S., employees of public international organizations, candidates for elective office, political party officials, family members of government employees, and members of a royal family may be considered Government Officials.

**State- owned or -controlled enterprises** may include, for example, hospitals, oil companies, public utilities, railroads, airlines, TV stations, public universities, sovereign wealth funds, central banks, and pension funds.

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# Promoting Fair Competition

Do not enter into any agreement with competitors that deprives customers of the benefits of competition.

Current never colludes with other companies on price or terms to be offered to customers.

Current never agrees with competitors to allocate markets or customers.

Current never manipulates the bidding process.

## WHAT TO LOOK OUT FOR

- **Proposals or requests for an agreement or understanding with any competitor** about any aspect of competition between **Current** and a competitor, including agreements on pricing, bidding, deal terms, wages, or the allocation of markets, employees, or customers.
- **Proposals or requests to enter into any agreement with any other party** regarding whether or how to bid. Only submit bids if the purpose is to compete for and win a specific piece of business.



## WHAT TO LOOK OUT FOR

- **Contacts of any kind with competitors** that could create the appearance of improper agreements or understandings. Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are raised, and promptly inform your legal counsel.
- **Understand and follow the business’s specific guidelines** about contacts with competitors, obtaining and handling competitive information, and participating in trade and professional associations.
- **Avoid agreements or understandings** that restrict the price at which a party may resell a product or service.
- **Do not provide, receive or exchange** any of the following types of information with a competitor or its representative, whether in person, electronically or at an industry meeting:
  - Prices
  - Bids
  - Customers, suppliers, sales territories or product lines
  - Terms or conditions of sale
  - Production, sales capacity, or volume
  - Costs, profits, or margins
  - Market share
  - Sales, marketing or development strategies for products or services
  - Distribution methods

## WHAT YOU SHOULD KNOW

**Before agreeing to any of the following, first seek advice from Company legal counsel:**

- Sale of multiple products in “bundles.”
- Exclusive arrangements.
- Technology licenses that restrict the freedom of the licensee or licensor.
- Price discounts that depend on loyalty or volume or are offered only to certain customers.
- Pricing initiatives.
- Distribution or supply arrangements with competitors.
- Policies concerning access of customers and third parties to parts, software and other inputs for the servicing of Current equipment.
- Any proposed merger, acquisition or joint venture.

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# Fair Employment Practices

**Treat all employees fairly and with respect.**

**Current bases employment decisions on job qualifications and merit**, which include education, experience, skills, ability, performance, and integrity.

**An individual’s race, color, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic protected by law is not a factor(s) that determines employment outcomes in the business.**

**Current respects human rights** everywhere we work and do business with others.

**Current complies with all laws** pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labor, trafficking in persons and employment discrimination.

**We take affirmative action** to increase opportunities in employment for underrepresented populations, including women, minorities, people with disabilities and veterans.

**We respect employees’ privacy rights** and will use, maintain and transfer personal data in accordance with **Current’s** Employment Data Protection Standards, related procedures, and local law.

## WHAT TO LOOK OUT FOR

- Refusing to work or cooperate with others because of characteristics covered by this policy, such as race, religion, sex, age, sexual orientation, gender identity, or other characteristic protected by law.
- Failing to create or contribute to a working environment free from harassment based on any protected characteristic, including bullying.
- Making an unwelcome sexual advance to an employee or other person with whom you work.
- Disclosing employment data to a person who does not have a business need, the authority, or, where required, the subject’s consent.
- Failing to consult with your manager, Human Resources Manager, or Current Legal Counsel if you encounter a conflict between this policy and local laws, customs, or practices.

## WHAT YOU SHOULD KNOW

**Current** absolutely prohibits taking adverse action against an employee because he or she has raised a concern about a violation of policy or law.

**Current** maintains a strong anti-harassment and anti-bullying policy which can be accessed [here](#).

**Current’s Employee Data Privacy Policy** is [here](#).

Find **Current’s Human Rights Policy** [here](#).

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# Safety & Well-Being

Follow safety procedures and be alert to environmental and safety hazards in your workplace.

Current strictly complies with all environmental, health, and safety (EHS) laws that apply to our operations.

Current develops and follows safe work policies and procedures to ensure workplace safety and prevent injuries.

Current installs, maintains, and monitors environmental controls to ensure our emissions meet legal requirements.

## WHAT TO KEEP IN MIND

- **Understand and comply with all the EHS policies** that apply to you and any specific policies that apply to your site, position, or operation.
- **Follow Corporate and business policies** for managing, shipping, transporting, importing/exporting and disposing of hazardous materials and chemicals.
- **Question unsafe or improper operations** and insist on a “stop work,” if necessary, to address them.



## WHAT TO LOOK OUT FOR

**Eliminating or guarding against hazards starts with identifying them.** You must alert supervisors or EHS leaders if you are aware of hazards or standards that are being ignored or hidden.

### Red flags include:

- Failure to obtain or comply with regulatory permits.
- Deviations from written work practices – even if these deviations have become “routine”.
- Lapses in security or emergency preparedness.
- Inadequately maintained tools or equipment.
- Unsafe driving.
- Missing machine guards or faulty protective equipment.
- Failure to use lock-out/tag-out procedures or fall protection.
- Improperly shipped wastes or hazardous products.
- Unsafe customer sites.

## WHAT YOU SHOULD KNOW

Each of us is responsible for safety and promoting safe practices.

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# Security

**Current has no greater responsibility than to protect its people and operations.**

**Current prepares for and proactively takes action** to ensure the security of our people and operations globally.

**Current continually evaluates the internal and external environment to identify and protect against the risks posed by man-made or natural incidents** that affect our people, facilities, information technology assets, operating systems, products, services and our supply chain.

**Current communicates, as appropriate,** about prevention, emergency response, and business continuation with the **Current** community, government officials, the media, and the public where necessary.

## WHAT TO KEEP IN MIND

**Maintain situational awareness.** Help us protect you, your colleagues, and visitors – know your surroundings.

**Adhere to all entry/exit procedures.** Wear your badge and ensure others do, too. Badges provide a visible display that an individual's access is authorized and ensure **Current** facilities are open only to authorized personnel.

**Challenge individuals who do not have a badge** and report visitors who are unescorted.

**Comply with Current's travel policies.** Make use of the Travel Advisory System when planning travel.



## WHAT TO LOOK OUT FOR

- **Make travel arrangements through the Current Travel Center.** Obtain pre-clearances to designated countries.
- **Create and maintain a safe working environment.** Identify and report indicators or incidents of workplace violence to your manager, HR, Security Leader or Company Compliance Leader.
- **Observe global immigration rules** by ensuring your employees and invited guests comply with global immigration regulations when traveling.
- **Be an active participant** in Crisis Management, Business Continuity, and workplace violence prevention drills and security awareness sessions to ensure you have the knowledge to remain safe at work, home, and on the road.

## WHAT YOU SHOULD KNOW

### If You See Something, Say Something.

Involve **Current** managers or other facility security personnel if you encounter security concerns or call 911 in the U.S., Mexico, and Canada; 000 or 112 (on cell phone) in AUS; or 112 or 999 in the U.K. for any emergency.

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# Intellectual Property

Every Current employee has a responsibility to safeguard Current’s intellectual property – It is the key to our competitive advantage.

Current aggressively protects its intellectual property (IP) and enforces its rights against others who take or use Current IP without proper authorization.

Current respects valid IP rights and avoids unauthorized use of IP that belongs to other people or organizations.

## WHAT TO KEEP IN MIND

- **Classify, label, store and share all Current data, information and documents in accordance with Current’s Data Classification Policy [here](#)** and ensure that access to information and documents is granted only to individuals with a legitimate need.
- **Only use or distribute Current’s proprietary information for the benefit of Current**, and not for personal gain.
- **Do not take, access, provide access to, or use any of Current’s proprietary information or other IP** without authorization after leaving Current.

## WHAT TO LOOK OUT FOR

- **Do not bring, access, keep, share or use a third party’s proprietary information**, especially proprietary information from a previous employer, without first consulting with and receiving prior approval from your legal counsel.
- **Do not provide Current’s proprietary information to a third party without the proper internal approval** and the necessary confidentiality agreement with the third party. Consult legal counsel for appropriate agreement and language.
- **Do not use any source code or other software from a third party in any Current product or as a tool without obtaining prior approval.** Approval to use open source software can be requested through this site: <https://helpdesk.gecurrent.com>.

## WHAT YOU SHOULD KNOW

- **Consult with your manager, legal or IP counsel if you have any questions** or concerns regarding how to identify, handle and protect **Current’s** IP.
- **IP includes** patents, trade secrets, trademarks, copyrights and designs and helps protect **Current’s** inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, product shapes, proprietary information and many other things.
- **Proprietary information** is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

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# Cyber Security & Privacy

Respect privacy rights and protect against cyber risks to Current information, networks, and products.



- **Current respects individual privacy rights.**
- **Current is committed to collecting, handling and protecting Personal Information responsibly,** and in compliance with applicable privacy and information security laws.
- **Current may transfer personal information globally,** consistent with applicable law.
- **Current seeks to protect its networks, systems, devices and information in our possession.** It is our policy to use information only for legitimate purposes and to maintain appropriate access controls.
- **Current’s policy is to conduct security testing on our products prior to release** and to monitor for cyber security threats and vulnerabilities.

## WHAT TO KEEP IN MIND

- If you have responsibility for software, IT or product development, follow **Current’s** guidelines for Secure Software development by contacting the IT Team.
- Ensure appropriate vulnerability testing prior to release of any software, monitor for potential threats and vulnerabilities, and let customers know how to report any potential vulnerabilities they find to **Current**.
- Communicate as appropriate with customers about cyber security issues.

## WHAT TO LOOK OUT FOR

- Contact the **Current Cybersecurity Team** or your **Information Security Leader** prior to participating in efforts to develop industry standards around cyber security or engaging an outside firm or individual to perform vulnerability testing.
- Limit access to **Current** information to authorized individuals who need it for legitimate business purposes.
- Prevent unauthorized access, accidental loss, disclosure or destruction of **Current** information
- Secure physical copies and storage areas.
- Use strong passwords; don’t share your password with anyone.
- Use only **Current approved systems** and tools for storage, transmission and backup of **Current** information. **Do not use personal email, unapproved devices or software** to conduct **Current** business.
- When posting information online, do not disclose Personal Information, trade secrets, proprietary or other commercially sensitive information. **Current’s Acceptable Use Guide** is [here](#).
- Know the signs of phishing and recognize efforts to improperly acquire **Current** information.
- Consult with your IT Team leader before implementing new or significantly modified processes that use Personal Information, including new software or code.

## WHAT YOU SHOULD KNOW

Personal Information is any information relating to a directly or indirectly identifiable person (or in some cases, a company); examples include name, address, email, phone, national identifier and credit card number.

Cyber Security & Privacy incidents can happen in several ways. Report any risks or incidents at <https://my.currentlighting.com/the-current-way/ombuds-members>

The following are some of the issues you must report if you encounter any of them:

- Possible loss or theft of data, including lost laptops and other computing equipment
- Loss, misuse or improper access to data.
- Security issues involving a **Current** product or system.

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# Transparency

Be honest, complete, and accurate in our business dealings, accounting, communications, and decision-making.

Current’s accounting and reporting will faithfully reflect the economic substance of the Company’s business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

Current will prepare timely, accurate, and complete financial information for use in reports to management, investors, regulators, and other stakeholders.

Current will ensure that management decisions are based on sound economic analysis and complete facts with appropriate consideration of short and long-term risks.

## WHAT TO KEEP IN MIND

- **Current’s** reputation commercially and regulatorily depends on actions, transactions, accounting, and reporting that are consistent with strong controllership values.
- Maintain effective processes and internal controls that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- Maintain complete, accurate and timely records and accounts to appropriately reflect all business transactions.



## WHAT TO LOOK OUT FOR

- Be wary of financial results that seem inconsistent with underlying performance and instances where someone circumvented a Company review and approval procedure or process.
- Create documents that are factual, accurate and complete, and follow Company policies in deciding when to retain and dispose of them.
- Never engage in inappropriate transactions, including those that misrepresent the reporting of other parties such as customers or suppliers.
- Incomplete or misleading communications about the substance, nature, or reporting of a transaction may violate this Transparency policy.

## WHAT YOU SHOULD KNOW

Raise a concern if you become aware of actions, transactions, accounting or reporting that are inconsistent with our controllership values and the protection of Current’s reputation.

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# Conflicts of Interest

Always make business decisions based on what is best for Current, never what is best for you personally.

Business decisions must be made in the best interest of Current. This means that nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of the Company.

## WHAT TO KEEP IN MIND

- No activity at work or home should harm **Current’s** reputation or good name.
- You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.
- Misusing **Current** resources or influence is prohibited. Even when nothing wrong is intended, the perception of a conflict of interest may have negative effects.



## WHAT TO LOOK OUT FOR

- Obtain prior approval from your manager, HR and Company Legal Counsel before hiring, promoting or directly supervising a family member or close friend.
- Obtain prior approval before accepting officer or director positions with an outside business or not-for-profit organization. This excludes religious or school (non-university) affiliations.
- Disclose financial interests you may have in a company where you could personally affect **Current’s** business with that company.
- Do not accept gifts other than those of nominal value from suppliers, customers or competitors.
- Do not accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your **Current** peers.
- While incidental use may be acceptable, do not use **Current** resources, intellectual property, time or facilities for personal gain. Avoid any activity which creates the potential perception of a conflict between your personal interests and the interests of **Current**.

## WHAT YOU SHOULD KNOW

Failing to promptly disclose a potential conflict is **always** a violation. Disclosing potential conflicts of interest allows your management team to mitigate risks which may influence your business decisions.

You can disclose a potential conflict by disclosing it in **Current’s** concern reporting portal Ethix 360.

### CURRENT OMBUDS NETWORK CONTACT INFO:

<https://my.currentlighting.com/the-current-way/ombuds-members>

You can report concerns online at

 <https://currentombuds.ethix360.com/>

 Or by calling: 1-833-328-7669

# Always Ask Three Key Questions

Integrity is your responsibility every day.

*The Current Way* is not a substitute for your good judgment, and it cannot cover every conceivable situation.

## WHAT TO KEEP IN MIND

Be alert to signs that you or your colleagues are in an integrity gray area.

You might find yourself faced with an integrity situation or issue at almost any time and just about anywhere.

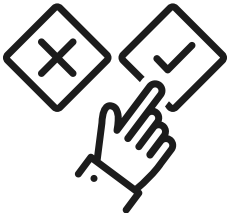
It is important to understand that your commitment to and accountability for upholding the highest standards of integrity do not stop when you leave the workplace. **It applies at any time and wherever you are representing the Company.**

## ASK YOURSELF THREE KEY QUESTIONS

Before engaging in any questionable activity, ask yourself these three very important questions:

- 

**1** How would this decision or action look to others within Current or externally?
- 

**2** Am I willing to be held accountable for this decision or action?
- 

**3** Is this action or decision consistent with Current’s Code of Conduct?

If the answer to any of the questions above is “No,” then don’t carry through with the decision or action since more likely than not you will be violating the Current Way and exposing yourself to disciplinary action, up to and including termination of your employment.

## WHAT YOU SHOULD KNOW

**Speak up** when you encounter issues or situations that appear to be at odds with this Code of Conduct.



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