DOMESTIC REGULATIONS

CONFLICT MINERALS

1502 of the Dodd-Frank Act requires publicly traded companies to disclose to the Securities and Exchange Commission (SEC) whether products they sell contain minerals that are sourced from the Democratic Republic of Congo (DRC) and/or its adjoining countries. These minerals include tin, tantalum, tungsten, and gold, also known as the 3TGs. As a privately-owned company, LightCorp does not fall under this regulation. As a courtesy to our publicly-traded customers, LightCorp has been issuing Conflict Mineral Reporting templates (CMRT) since 2012 based on responses provided from our supply chain. This process typically begins in November and our final reports are issued the following March to help customers meet the SEC deadline. The current CMRT is provided at a company level and product-specific information will be provided once the required supply chain data is obtained.

TOXIC SUBSTANCE CONTROL ACT (TSCA)

In January 2021, the U.S. Environmental Protection Agency (EPA) published final rules under the Toxic Substances Control Act (TSCA) Section 6(h) that restricts the importation and use of five persistent, bioaccumulative, and toxic (PBT) chemicals. This regulation now applies to end products or "articles." LightCorp will provide this information once the required supply chain data is obtained.

CALIFORNIA PROPOSITION 65

Proposition 65, officially known as the California Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. The proposition protects California's drinking water sources from contamination with chemicals known to cause cancer, birth defects, or other reproductive harm, and requires businesses to inform Californians about exposures to such chemicals before purchasing their products. LightCorp products comply with Prop 65 regulations and are labeled where required. Product Safety Data Sheets (SDS) are available per product type upon request.

EUROPEAN REGULATIONS

EU REACH

REACH stands for Registration, Evaluation, Authorization, and Restriction of Chemicals and came into force in 2007. It is a regulation within the European Union (EU) to improve the protection of human health and the environment from the risks posed by chemicals. REACH applies to chemicals themselves as well as those within articles such as clothing, furniture, and electrical appliances. As a company established outside the EU, LightCorp is not bound by these obligations; the responsibility lies with the importer or customer representative within the EU. As a courtesy, LightCorp will provide this information once the required supply chain data is obtained.

EU RoHS

RoHS stands for Restriction of Hazardous Substances and restricts the use of ten hazardous materials found within electrical products. RoHS began in the EU in 2002 and was recently updated in 2019 to add four phthalates to the restriction list. EU RoHS is a CE marking directive and all applicable products must comply with EU RoHS to be placed on the EU market (Other countries may have their own version of RoHS). Currently, LightCorp electrical products are not sold on the EU market. As a courtesy, LightCorp will provide this information once the required supply chain data is obtained.

BEST PRACTICES

ENVIRONMENTAL

LightCorp manufacturing processes include an Environmental Management System (EMS) that is compliant with ISO 14001-2015. Our engineering process will include product evaluations ensuring environmental/life cycle considerations are made during the product development stage. Waste management is conducted per product type to reduce manufacturing wastes and recycling of materials (where available) in our area. Manufacturing materials currently being recycled include corrugated cardboard, packaging material, steel, aluminum, iron, copper, paper, plastics, plastic film/banding, electronics, LED lamps, fluorescent lamps, and paint powder. LightCorp manufacturing processes are near zero-landfill. Supply chain practices include using returnable totes/containers where available. Our cross-functional Green Team meets once a quarter to discuss environmental aspects and impacts and pollution prevention actions of our facility, products, and processes. The team ensures compliance with all applicable environmental regulations and laws. LightCorp received the Michigan Clean Corporate Citizen designation in 2003 for Ottawa County, Michigan. Our ISO 14001 EMS certification and Environmental Policy are available upon request.

RECYCLING DATA

Recycling content can include pre or post-consumer materials. Pre-consumer material is that which is recovered from the manufacturing process (i.e., dust from a sawmill). Post-consumer material is that which has been used for its purpose, recycled, and then turned into something new (i.e., water bottles turned into an ink pen). LightCorp products are currently made of many recyclable materials like plastics, aluminum, or steel (please see individual product specification sheets for details). Currently, LightCorp products do not contain post-consumer materials and the level of pre-Consumer material fluctuates per raw material, so we are unable to determine an amount per product. Corrugated cardboard used in packaging is 100% post-consumer. Crinkle paper used in packaging is 100% post-consumer.

FULL MATERIAL DISCLOSURE

Full Material Disclosure (FMD) is a detailed report on the homogenous level of substances and material breakdown of a product. An FMD looks at the material and substances at a component level and relies on gathering accurate data from the supply chain. Once the task of gathering the data is complete, an FMD can be used to show compliance to a variety of mandatory and/or voluntary regulations or other customer-driven environmental initiatives. Although LightCorp evaluates the impacts of our products on the environment, we are not currently pursuing FMDs for our products.

GREENHOUSE GAS EMISSIONS

Greenhouse Gas (GHG) is a gas that absorbs and emits radiant energy within the thermal infrared range causing a greenhouse effect. GHGs include carbon dioxide, methane, nitrous oxide, and fluorinated gases that can remain in the atmosphere for different amounts of time ranging from a few years to a few thousand years. Each gas has a Global Warming Potential (GWP). There are several inputs for calculating GHG emissions within Scope 1, Scope 2, and Scope 3. Currently, LightCorp is not pursuing any voluntary GHG reporting.

CORPORATE RESPONSIBILITY REPORT

Sustainability reports vary by company type but typically include data and information regarding the

organization's efforts towards energy, water, GHG emissions, resource depletion, social responsibility, circular economy, sustainability goals, and its progress towards those goals. LightCorp's Corporate Responsibility Report for the previous year is available for download on our website at: https://www.lightcorp.com/corporate-responsibility/.

VOLUNTARY STANDARDS

LBC RED LIST

The Living Building Challenge (LBC) Red List represents "worst in class" materials, chemicals, and elements known to pose serious risks to people and the environment. The LBC Red List also contains a list of chemicals that hold priority for Red List inclusion as well as a list of chemicals to continue to monitor in the future. Currently, LightCorp is not seeking data regarding the LBC Red List compliance.

BIFMA LEVEL

BIFMA Level e3 is a sustainability standard with third-party certifications for office furnishings including walls, desks, tables, chairs, and related accessories. LightCorp products would fall into the accessories category. Level e3 looks at environmental, health & wellness, and social impacts of the certifying company, from company policies to production practices and product materials. Certification to e3 is based on a point system ranging from 32–111 points, giving 3 different levels to achieve. For more information on the Level standard, please go to https://www.bifma.org/page/e3standard. Currently, there are 62 power/data ports certified to e3 and 16 lighting products: both at varying levels. LightCorp is not currently seeking BIFMA Level certification.

LEED

LEED is a sustainability standard for green building design, construction, operations, and performance. Individual products cannot be LEED certified nor will they have guaranteed points assigned to them. There are different rating systems for LEED including Building Design + Construction (BD+C), Interior Design + Construction (ID+C), Operations + Maintenance (O+M), Cities, and Communities. LEED project compliance is based on a point system that varies per rating system. Credit categories look at things like integrative processes, location, transportation, water efficiency, energy and atmosphere, materials and resources, indoor environmental quality, and innovation. The credit system can be further explored at https://www.usgbc.org/credits. LightCorp lighting products can directly help contribute to the Indoor Environmental Quality section, Interior Lighting for the Color Rendering (CRI), and Lighting Control aspects. Because LEED is project-based, LightCorp cannot specifically state how many points an individual product/order would contribute to overall LEED project points.