

# PRODUCT POLICY

## Introduction

This policy complements the EHS policy and sets out Collingwood Lighting (“Collingwood”) commitments concerning the conception of our products. The policy addresses the company’s approach to operating in compliance with applicable local and national regulations on product safety. It also reflects our commitment to develop class-leading products with high energy efficiency, long lifetime and increasingly designed to be upgraded and repaired throughout their life. This policy also recognises our obligations to provide customers with an end-of-life take-back scheme.

The Board of Collingwood has approved this policy and has delegated responsibility for its oversight to Joao Pola, CEO of the Company.

## Scope

The policy applies to all operations under the direct control and responsibility of Collingwood (including contractors working at the company’s premises) both domestically and abroad.

All group companies and business units worldwide, including joint ventures where we have a controlling interest, are required to apply this policy and its principles. Where we have a non-controlling interest we should encourage the application of this policy with our business partners. Existing business relationships should also be assessed from time to time.

In addition, this policy must be considered when entering into new business relationships, either through mergers, acquisitions, joint venture or new customers and suppliers. Such new relationships require careful assessment of the EHS risks and performance of any business partner.

## Policy

Products developed and commercialised by Collingwood should be conceived to:

- Comply with applicable local and national regulations, legislation and standards.
- Use materials, components and technologies to the highest possible energy efficiency in their category.
- Use materials, components and technologies to maximise their operating life.
- Where possible given the use of the product, be upgradable, repairable throughout their operating life.
- Where possible given the use of the product, be easy to dismantle for recycling at end of life.
- Use environmentally friendly packaging materials.

## Key product issues

'Product issues' as referred to in this policy may include, but are not necessarily limited to, the following risks and opportunities:

- The safety and compliance of products
- The maximisation of energy efficiency during operation
- The lifetime of products
- The ease of maintenance
- The minimisation of packaging waste
- The ease of recycling at end of life

## Responsibility

The CEO is the main board director with primary responsibility for overseeing the implementation of this policy and for reporting annually to the Board.

Collingwood will establish appropriate supplier selection and product development and procurement responsibilities, procedures and resources within their operations to ensure that this policy is fully implemented.

'Resources' may include, for example:

- Formalised product development process, including testing and certification regime.
- Formalised supplier selection and on-going auditing process.
- Regular visits to suppliers from Collingwood's technical and management teams.
- Formalised product inspection process and monitoring of on-going issues.

## Mergers, acquisitions, joint ventures and associates

Periodically Collingwood may explore opportunities to acquire companies and to enter into partnerships and joint ventures. As part of the commercial and financial due diligence process of such transactions, the EHS status of any company we invest in or acquire, may need to be investigated or assessed to an appropriate level of detail. The focus and depth of such assessments must be decided on a case by case basis but may include, for example, investigations into the potential for historical contamination of soil/groundwater; assessments into the condition and future longevity of pollution control equipment; or reviews of the company's EHS management systems. We need to be sure what we may be inheriting.

## Business interfaces

On a case-by-case basis, reviews may need to be undertaken on a regular basis to assess the EHS status and performance of third parties who provide services on behalf of Collingwood including contractors and other regular counterparties such as suppliers of goods or services (e.g. hazardous chemicals) that are inherently associated with potentially significant EHS issues.

## Training

Training will be provided on this policy and its implementation and will be tailored to the key product issues, risks and opportunities identified by the company. The training program will encompass induction training for new employees as well as on-going/refresher training where needed.

## Reporting

In addition to any statutory reports that the company is required to submit to EHS regulatory bodies, the CEO will ensure that the Board receives appropriate reports and briefings on EHS matters, including the following:

### Incident reporting

The CEO will notify the Board as soon as possible in the event of any material negative developments. Examples include:

- significant product compliance issues;
- significant safety issue;
- significant customer complaint;
- significant regulatory changes;

### Annual reporting

The CEO will provide the Board with an annual Product Report. The format and content of this annual report shall be agreed with the Board in advance but at minimum is likely to include:

- Summary information on the implementation of this policy and any key developments and/or suggested changes for Board consideration
- Summary information on performance of the company's product management systems including any major changes enacted by management during the reporting period
- Any strategic product-related corporate initiatives or stakeholder partnerships
- Performance against product objectives and targets (NPD activity, product efficiency improvements for instance)

## Monitoring and review

This policy will be enforced through regular monitoring and review and will form part of the company's internal audit procedures.

## Queries

Should you have any questions regarding this policy or the supporting principles please contact:



Joao Pola  
CEO – Collingwood Lighting Group