

Light is OSRAM

**OSRAM**

# Communication on Progress 2016



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## Introduction

Actions speak louder than words – following this motto, OSRAM is committed to a broad scope of sustainable actions, processes and projects. In order to communicate these sustainability efforts to our stakeholders in a transparent and comprehensible way, OSRAM reports on them in its yearly updated communication on progress, in its GRI G4 report, in the sustainability chapter within its annual report and on its website. > [Sustainability at OSRAM](#)

## Company Profile

OSRAM, based in Munich, is a globally leading lighting manufacturer with a history dating back more than 100 years. The portfolio ranges from lamps, luminaires and lighting solutions with a leading position in a wide range of market segments. Our product portfolio spans the entire lighting value chain, from light sources down to custom light management systems, both in general and in speciality lighting. > [Business activities and structure of OSRAM Licht Group](#)

OSRAM is a listed company and had around 24.600 employees worldwide at the end of fiscal 2016 (September 30) and generated revenue of €3.78 billion in that fiscal year\*. > [Fiscal year 2016](#)

## Sustainability at OSRAM

As a leading provider in the global lighting industry, we base our strategic decisions on a holistic and integrated concept considering all three pillars of sustainability – economy, environment, society – which is setting the framework for all our thoughts and actions.

We provide our major stakeholders with a comprehensive and transparent picture on the positioning of OSRAM, as far as sustainability is concerned, and are an acknowledged and reliable partner, promoting sustainability within the lighting industry and beyond. > [Sustainability at OSRAM](#)

Our corporate responsibility for sustainable development is an integral part of our strategy. Along with our brand and strategy, corporate culture is a central element of the OSRAM identity. The "Innovative – Respectful – Entrepreneurial" corporate values define our understanding of how we should interact with each other and with others. They are reflected in our daily behavior and in facts and figures that define OSRAM as a business. For us, being innovative means contributing to social responsibility by making our products more energy-efficient. This is also in line with the "Respectful" value which stands for our careful use of resources and which governs our dealings with colleagues, customers, suppliers, investors, and the public. We promote the ability to think as entrepreneurs among all our employees and managers, which motivates us to always give our best to create added value for all stakeholders. Acting sustainably as an international company requires the constant engagement with different stakeholders. This is how we can establish mutual trust, contribute to spreading sustainable concepts and receive feedback on our own actions. > [Stakeholder Dialogue](#)

The framework of our sustainability actions consists – beside the OSRAM identity – of our [OSRAM Business Conduct Guidelines \(> BCGs\)](#). This corporate code of conduct defines group wide rules, covering the areas of human rights, labor, environment and anti-corruption. It combines important international standards (e.g. Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at work, "Agenda 21" on Sustainable Development, UN Convention Against Corruption) and clearly summarizes our basic values.

Organizationally, the interdisciplinary and company-wide topic of sustainability, is directly anchored at senior management level via the Chief Sustainability Officer. Tasks to be performed and key topics are developed and prepared by the sustainability department together with the content owners concerned and are presented for discussion by the Sustainability Council, which consists of delegates from Business Units and the heads of the corporate functions relevant to sustainability. The Council approves the draft resolutions on sustainability to be submitted to the Managing Board. The sustainability department is responsible for preparing Sustainability Council meetings, and manages the implementation of decisions. > [Sustainability Management](#)

\*Unless indicated otherwise, all figures relate to continuing operations (i.e. excluding lamps)

## Statement of continued Support



Dear valued stakeholders,

For OSRAM Licht AG fiscal year 2016 was extraordinarily successful. We achieved another record year in terms of business performance while implementing the biggest reorganization in OSRAM's history. This is an outstanding result, given that we are in the midst of the transformation of the lighting market.

2015 we launched our innovation and growth initiative Diamond. Implementation of Diamond is now well under way and at the same time, we got a sizable company with €2 billion in revenue up and running within a very short space of time by separating and selling of the lamps business. After carving out this business, which now operates under the name LEDVANCE, we were once again able to position the remainder of the business as a high-tech group under the OSRAM brand. Our three-pillar strategy and Diamond initiative provide us with a framework within which we can continue to grow until 2020.

In all its three pillars, the lighting company wants to benefit even more from the potential of semiconductor-based technologies and will make appropriate investments in the coming years. We are expanding our expertise in chip production and will further enhance conversion of our innovative strength in the area of new applications in the visible and invisible light spectrum - such as laser lights in automotive lighting or light-based sensors in security technology - into business success in the future.

Some of our investments became visible in 2016: During the second quarter of fiscal year 2016, ground-breaking ceremonies took place for new electronic component production facilities in Plovdiv, Bulgaria, and Monterrey, Mexico, the purpose of which is to help meet the growing demand for intelligent lighting systems in local markets. In March 2016, the ground-breaking ceremony for a new LED chip plant also took place at Kulim in Malaysia. This will be the world's biggest six-inch LED chip factory and manufacturing of chips for automotive and general lighting will start at the end of 2017.

All our strategic decisions are based on our integrated concept of sustainability in which innovation is one of the key drivers. Innovation helps us to create sustainable value for our customers and the environment. Today's smart lighting systems and modern luminaires require a fraction of the energy consumed by conventional lighting just a few years ago. Energy-efficient products and solutions currently account for the majority of sales at OSRAM, more than half of which is attributable to LEDs, the light source of the future.

In order to frame our activities we commenced to thoroughly analyze the UN Sustainable Development Goals during the last fiscal year. The goal is to identify potential future risk areas but mainly to uncover innovation and collaboration opportunities in line with and contributing to the 2030 Agenda for Sustainable Development. Global challenges such as urbanization, climate change, shortage of resources and demographic changes require sustainable product solutions. Light is a rapid and effective lever here. We feel committed to continue making our contribution to sustainable development with innovative solutions.

At the same time OSRAM is responsible for its present activities throughout the world. This includes our portfolio, our business operations, our dealings with customers and suppliers, but also our own production activities in relation to the environment and resources, as well as occupational health and safety. In all of these areas, we help to reduce negative impacts and strengthen positive effects using appropriate management systems and organizational measures.

The success of our sustainability activities was repeatedly confirmed by external sources in fiscal 2016. For example, sustainability investment specialists RobecoSAM acknowledged our performance with a Bronze Class award. Our shares were listed in the Dow Jones Sustainability Index World, a key benchmark for financial investors, for the third consecutive time. We also remained a member of the FTSE4Good Index and were included in the STOXX Global ESG Leaders index for the second time. We also retained our oekom Prime Status that we had been awarded once again in 2015. This is presented to companies classed as sustainability leaders in their respective sectors during the oekom corporate rating.

Organizationally, the interdisciplinary and company-wide topic of sustainability, is directly anchored at senior management level via the Chief Sustainability Officer. Relevant topics are presented and discussed at the Sustainability Council. The Sustainability Council consists of delegates from Business Units and the heads of the corporate functions relevant to sustainability. This structure ensures a broad support for the attainment of our sustainability goals and the contribution towards the principles and goals of the UN Global Compact.

In the last fiscal year, the Sustainability Council focused on examining the management processes relating to human rights and on working through the changes in the requirements for sustainability-related, non-financial reporting. The materiality analysis (identification and evaluation of significant matters relating to sustainability) carried out in fiscal year 2015 remains the basis for our key topics. The key topics relating to the environment are product responsibility, operational eco-efficiency, and climate strategy. From the social perspective, they are working conditions, occupational health and safety, and human capital management. The subjects with economic relevance are operational and brand excellence, innovation management, and corporate governance.

Compliance with existing laws and uniform Group-wide regulations is a prerequisite for business success. Infringements of existing anti-corruption or antitrust rules run counter to our core values. Our compliance system is designed to prevent potential violations or to detect existing violations and, if necessary, to introduce the appropriate preventative measures for the future.

With this Communication on Progress we want to highlight our commitment to the UN Global Compact and in continuously supporting broader sustainable development goals.

Sincerely yours,

Dr. Olaf Berlien

Chairman of the Managing Board of OSRAM Licht AG and OSRAM GmbH

## Human Rights and Labor Principles

Human Rights: Businesses should

Principle 1: support and respect the protection of internationally proclaimed human rights;

Principle 2: make sure that they are not complicit in human rights abuses.

Labor: Businesses should uphold

Principle 3: the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

### Assessment, Policy, Implementation

The materiality analysis (identification and evaluation of significant matters relating to sustainability) carried out in fiscal year 2015 remains the basis for our key topics. The key topics relating to the environment are product responsibility, operational eco-efficiency, and climate strategy. From the social perspective, they are working conditions, occupational health and safety, and human capital management. The subjects with economic relevance are operational and brand excellence, innovation management, and corporate governance. The process in 2015 was: After the Sustainability Council had taken OSRAM's and stakeholders' viewpoints into account and assessed sustainability topics from both an internal and external perspective, we incorporated external stakeholders in the materiality analysis, particularly, in relation to the perspective from outside the Company. Representative members of each stakeholder group assessed preselected sustainability topics, and the results were discussed and confirmed by the Sustainability Council. > [Annual Report 2016, p. 32](#) > [Materiality Analysis](#)

We are committed to the principles of the UN Declaration of Human Rights. OSRAM takes responsibility as an employer, respects the human rights of all employees, and is explicitly against child labor, and unethical and unsocial business practices. OSRAM does not discriminate by ethnic origin, gender, religion, social background, disability, political views, or sexual orientation.

We respect local laws on wages and salaries in all countries in which we operate. Our employees throughout the world have the right to freedom of organization and assembly. In countries where employee representative bodies have been established, we set great store by working as closely and constructively as possible with employee representatives. We seek to offer our employees a safe working environment on fair terms. We will only be able to shape the future of light by working together with a team of committed employees. Where redundancies are unavoidable as part of the technological shift and associated restructuring measures, OSRAM tries to manage these with the minimum possible social impact. > [Labor Practices](#)

Global Compact's human rights and labor principles are covered by our > [BCGs](#) and our > [Code of Conduct \(CoC\) for OSRAM Suppliers](#). Like our own business conduct guidelines, it incorporates the most important international standards and conventions and addresses important matters such as compliance, the environment, human rights, and conflict minerals. As well as accepting our Code of Conduct, our suppliers are required to provide self-certification. In addition, we hold supplier days in various regions in order to exchange information with our suppliers. Another cornerstone of our supplier management is the expertise of our employees. We train our global procurement teams and raise awareness of sustainability by running regular information initiatives and training courses. > [Annual Report 2016, p. 35](#) > [Supplier Management](#)

The issue of conflict minerals is one of the aspects of a [sustainable](#) supply chain that continues to gain importance. We addressed this in 2013 by introducing an appropriate policy and expanding our code of conduct for suppliers to include conflict minerals. The target for the OSRAM Licht Group is to create total transparency regarding the origin of potential conflict minerals by 2017. > [Annual Report 2016, p. 35](#), > [Conflict Minerals](#)

Strict management and the orderly documentation and monitoring of processes, equipment, methods, and procedures, together with appropriate training programs, are essential to implementing OSRAM's commitment to providing a safe, healthy working environment for all employees and to minimizing the risk of accidents at work or of employment-related illnesses. All OSRAM employees have an obligation and responsibility to be mindful of safety at all times, wherever they are. In order to monitor ongoing compliance with our occupational safety targets, we have introduced a management system that meets the requirements of the internationally recognized OHSAS 18001 standard.

Risk assessments have to be carried out for all areas of operation by the responsible managers, supported by trained safety representatives. In addition, we have established occupational health and safety committees at all relevant sites, in accordance with local legal requirements or on a voluntary basis.

We use key performance indicators to monitor the effectiveness of our occupational health and safety programs. In fiscal year 2016, we introduced two new global KPIs in order to analyze accidents more effectively and ensure that we take appropriate measures. These are the severity rate and the lost time injury frequency rate (LTIFR) per 1,000 employees. The success of our programs can be seen at OSRAM GmbH, where the number of workplace accidents is well below the average reported by the employers' liability insurance association. As a result, all OSRAM GmbH sites had insurance premiums reimbursed in the 2015 calendar year. > [Annual Report 2016, p. 41-42](#) > [Health and Safety](#)

Diversity for OSRAM means creating the opportunity for employees from different cultures, and with different backgrounds, religions, genders, and skills to work together. In addition, we are convinced that diversity is a prerequisite for generating competitive advantages over our global competitors and securing market share. We use and offer a range of channels to ensure that the benefits brought by this diversity are developed in a sustainable manner. For example, different employee groups can exchange information and ideas in Group-wide networks. Open Mentoring, a program in which employees can choose a suitable mentor for themselves, is one of the ways in which we foster the sharing of experiences across hierarchical and international boundaries. We are also working to encourage more women to enter technological professions and to increase the proportion of managerial roles held by women. > [Annual Report 2016, p. 41](#) > [Diversity](#)

## **Measurement of outcomes**

The supply chain plays a key role for us in terms of sustainability. It requires a high degree of flexibility, particularly in view of the technology shift. For us, sustainability in the supply chain also means implementing our high environmental, social, and ethical standards in our business relationships with suppliers. A key part of this is our code of conduct for suppliers (CoC). > [Annual Report 2016, p. 31, 35](#) > [Supplier Management](#)

Accidents like stumbling, falling or tripping as well as commuting accidents (accidents related to transportation on the way to work or on the way back home) make up nearly half of all occupational accidents. Our aim is being accident-free – to this end, the accident prevention measures are constantly being improved in our plants. Above that, the OSRAM health and safety committee committed itself to intensify trainings to further reduce the frequency and severity of occupational accidents. The effectiveness of our health and safety programs can be measured by the relevant statistics on our website: > [Health and Safety Statistics](#).

Highly motivated, performance-driven employees are essential to the successful development of our business, particularly against the background of the fundamental technology shift in the lighting market. Our employees are one of our key resources. How we treat our employees is the most direct indication of our understanding of human rights and fair labor practices. OSRAM firmly stands by its commitment to treat all employees equally and offer them benefits based on their performance. Our human resource statistics provide relevant information about our employees such as region and function. Our employee statistics are available in our Annual Report and our website: > [Annual Report 2016, p. 40](#), > [Social Reporting](#)

## Environmental Principles

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies

### Assessment, Policy, Implementation

For OSRAM, assuming social and corporate responsibility includes protecting the environment, ensuring occupational health and safety, and preserving natural resources. This underlines the key topics in the environmental dimension resulted from our materiality analysis in fiscal 2015: product responsibility, operational eco-efficiency, and climate strategy. > [Annual Report 2016, p. 32](#)

Global Compact's environmental principles are covered by our > [BCGs](#), the > [CoC for OSRAM Suppliers](#) and our > [Environmental Protection, Health Management and Safety \(EHS\) Policy and Guidelines](#). Our EHS policy provides a framework for action and the setting of objectives, targets and programs for environment, health and safety topics. It is binding on all sites worldwide.

For OSRAM, environmental protection encompasses a sustainable approach to energy saving, water conservation, waste disposal, chemicals, and emissions monitoring. Great importance is also attached to environmentally friendly design and product recycling. These objectives are enshrined in our EHS (environmental protection, health management, and safety) policy, which is binding on all operating sites worldwide. It sets out our environmental policy guidelines and targets for the Company. In order to monitor compliance with our environmental targets continuously, we have introduced clear areas of responsibility with corresponding management powers in line with the international ISO 14001 standard. In return, we regularly receive matrix certification for all of our global production sites from an external body. The environmental permits for production plants were shared or duplicated for OSRAM and LEDVANCE so that production could continue at all plants without interruption. > [Annual Report 2016, p. 36-37](#), > [Environmental Reporting](#)

As planned, an ISO 50001-certified energy management system was introduced in all European plants outside Germany during the past fiscal year. Our ISO 50001 matrix certification now covers all production facilities in the European Union. > [Annual Report 2016, p. 37](#)

OSRAM is striving to go above and beyond the legal requirements for reducing the use of critical substances wherever technically and economically viable. We are actively championing the introduction of globally harmonized substance restrictions, e.g. in connection with implementation of the Minamata Convention in the signatory countries. Directive 2011/65/EU (RoHS), which bans certain substances and imposes mercury limits for lamps, serves as a model for comparable legislation in other countries and regions, such as the Middle East and India. We have developed and implemented a dedicated SAP tool that enables us to monitor the use of critical substances at component level and to ensure long-term legal compliance against a backdrop of constantly increasing requirements. > [Annual Report 2016, p. 38](#), > [RoHS Directive](#)

We conduct product lifecycle analyses in order to evaluate the overall impact of OSRAM Products on the environment. The methodology used for these analyses is based on the international ISO 14040 and ISO 14044 standards. > [Annual Report 2016, p. 38](#), > [Life Cycle Analysis](#)

The aim of product recycling is to recover as many sorted materials as possible in order to conserve limited resources and to protect the environment by disposing of hazardous substances properly. The recycling of valuable metals such as tungsten and molybdenum, for example, plays a considerable role in the conservation of resources and reduction of costs. By taking the recycling aspect into consideration during product development, OSRAM ensures that a high proportion of components can be recycled. OSRAM meets its obligation as a manufacturer to take back products (e.g. under the European WEEE (Waste Electrical and Electronic Equipment) directive) by participating in organizations, companies, and foundations that were specially set up for this purpose. Luminaires contain electronic components and valuable raw materials. This is why it is important that the products are collected and recycled or disposed of safely. > [Annual Report 2016, p. 39](#) > [Recycling](#)

OSRAM works with UNEP's public-private partnership "en.lighten-initiative" to promote more efficient lighting. This initiative promotes efficient lighting in emerging and developing countries. Over the last fiscal year, the initiative has expanded its activities, e.g. to include street and office lighting solutions. > [Annual Report 2016, p. 6](#), > [en.lighten](#).

As a leading provider in the global lighting industry, we occupy a strong position in research and development (R&D), particularly in the fast-growing LED business. The changing lighting market means that the LED business continues to gain in importance. > [Annual Report 2016, p. 33](#) > [Innovation Management](#)

## Measurement of outcomes

The following performance figures relate to all locations that exceeded the thresholds set for parameters such as energy consumption, volumes of waste, or water consumption. Within the OSRAM Licht Group, energy efficiency is the metric against which our products, lighting solutions, and production facilities are judged every day. One example is our Energy Efficiency Project in which a team operating around the world has focused on the aim of implementing energy-saving and efficiency measures at all plants since 2013. The team continued to focus on energy-saving measures with the same high level of commitment in fiscal year 2016, with the result that global energy productivity was around 3% higher at the end of the fiscal year. This related to both primary and secondary energy consumption, further reducing the Company's global CO<sup>2</sup> emissions.

Actual primary energy consumption was down moderately year on year, falling to 984,694 MWh from 1,013,611 MWh in the previous year. Similarly, total electricity consumption saw a modest reduction to 712,828 MWh (previous year: 719,130 MWh). This directly impacted CO<sup>2</sup> emissions, which amounted to 197,943 tonnes (previous year: 203,559 tonnes) for primary energy and 362,367 tonnes (previous year: 369,019 tonnes) for electricity.

Profitable, efficiency-enhancing environmental and energy projects are rigorously pursued and fine-tuned at all plants. After officially opening a further cogeneration plant (combined heat and power unit (CHP)) in Eichstätt, Germany, in 2015, a new plant in Schwabmünchen, Germany, was brought on stream on the basis of the high level of efficiency achieved and the great benefit for the environment. This brings the total in Germany to six plants at four locations. They can be operated all year round because they use absorption coolers to produce the refrigeration required for the process from the heat generated by the CHP. To help combat climate change, OSRAM is also investing in new production facilities. In the summer of 2016 it finished installing solar modules on the administration and manufacturing buildings in Wuxi, China, which will reduce the amount of electricity that would otherwise be obtained from the public grid by around 420 MWh a year.

Luminaires are prepared for all-weather use in the paint shop at our plant in Traunreut, Germany. All individual parts must be thoroughly cleaned beforehand. Working with industrial cleaning agent producers Henkel and BCD Chemie, the cleaning process has now been optimized so that the plant can generally manage without heating the water for the process. This will reduce the paint shop's annual energy usage by 30% and achieve CO<sup>2</sup> savings of 120 tonnes. > [Annual Report 2016, p. 37](#)

In conventional lighting production, water is mainly used for cooling and pollution is therefore minimal. Nonetheless, responsible and conservative use of water is very important to us. We ensure that contaminated water is either purified by us or fed into local waste water treatment plants, while also setting ourselves the target of reducing our overall water consumption.

By contrast, LED manufacturing produces different types of effluents. They receive separate in-house treatment for each contaminant and the purified waste water is discharged into the sewage system. Total consumption in this area has been reduced by means of various water-saving projects, although this is often offset by rising production volumes.

We recorded a moderate increase in absolute water consumption in fiscal year 2016, when water consumption amounted to 3,377,691m<sup>3</sup> (previous year: 3,288,299m<sup>3</sup>). > [Annual Report 2016, p. 38](#), > [Water Management](#)



Prevent waste, recycle waste, dispose of waste: This order of priority is a mission statement for waste management in our plants, and also makes economic sense. In the past fiscal year, OSRAM produced 26,892 tonnes of recyclable waste worldwide (previous year: 30,665 tonnes) and 10,376 tonnes of waste for disposal (previous year: 11,396 tonnes). In the reporting year, the absolute reduction in both types of waste was again partly attributable to plant closures and the related relocations. > [Annual Report 2016, p. 38](#) > [Environmental Data](#)

We responded to the changing lighting market in fiscal year 2016 by clearly increasing the proportion of R&D expenditure for LED-related topics once more. Total expenditure for R&D and the level of research intensity were also increased significantly. Networked and intelligent lighting technologies and the integration of light, sensors, and communications technology are becoming increasingly important. In order to safeguard our position as a leading innovator in this sector, we have focused the activities of the Corporate Innovation function even more firmly on these areas and stepped up our collaboration with external innovation partners. At the same time, Fluxunit GmbH was established as an in-house business incubator to develop new, disruptive business ideas and external start-ups, and to bring them rapidly to market. > [Annual Report 2016, p. 33](#) > [Innovation Management](#)

## Anti-Corruption Principles

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

### Assessment, Policy, Implementation

Global Compact's anti-corruption principles are covered by our [> BCGs](#) (i.a. referring to the UN Convention Against Corruption and other international instruments) and the [> CoC for OSRAM Suppliers](#).

Compliance with applicable laws and with uniform Group-wide regulations is part of our DNA and it is a prerequisite for success in any business. OSRAM's compliance system is amongst other things designed to prevent the infringements of the applicable anticorruption and antitrust rules that would contradict our core values, to detect existing violations and, if necessary, to introduce the appropriate preventative measures for the future (Prevent—Detect—Respond). The system's key components are codes of conduct for employees and managers, training and communication about their content, and risk assessments and inspections at OSRAM's units.

**Prevent:** The OSRAM Business Conduct Guidelines define group wide rules of conduct, specifically on efforts to combat corruption and on proper conduct when engaging in competition. In addition, we address compliance-related risks through various IT tools. For example, we classify our business partners based on certain risk indicators, such as the level of corruption in the country in which the relevant business partner operates. We have also introduced country-specific tools addressing issues relating to giving and receiving gifts and hospitalities, sponsorships, donations, and memberships. All compliance regulations are continuously evaluated with regard to their practicability and adjusted or further developed if necessary. To ensure the implementation of our compliance system, multiple face-to-face and web-based trainings have been conducted.

**Detect & Respond:** In order to detect and respond to compliance violations, we rely on the whistleblower hotline "Tell OSRAM". Furthermore, all employees and external contacts have the option to report securely and anonymously violations to our compliance organization. We follow up on any indication of a violation. An internal compliance investigation is launched if justified by concrete evidence. Upon completion of an investigation, we propose remedies for the identified deficits and supervise their implementation. We also respond to detected misconduct with employment-law disciplinary sanctions. We monitor, evaluate and improve the OSRAM compliance system on a continuous basis. [> Annual Report 2016, p. 30 and 31-32](#), [> Compliance](#)

### Measurement of outcomes

In fiscal year 2016, the compliance organization received a total of 59 notifications of potential compliance violations. 16 compliance investigations were finalized as a result of which disciplinary steps were taken against 11 employees. An additional 42 existing matters were closed following detailed assessment. A total of 6,120 employees around the world received personal compliance training in the past fiscal year. In 2016, web-based antitrust training was also successfully rolled out to complement the web-based anticorruption training that had already been developed in 2015. [> Annual Report 2016, p. 30 and p. 33](#), [> Compliance](#)

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**Group Sustainability**

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