

## **Modern slavery and human trafficking policy statement**

### Policy statement

This policy statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Luceco plc has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

### Our business

We are a manufacturer and distributor of high quality and innovative LED lighting products and wiring accessories for a global customer base. The Group supplies a blue chip and diversified customer base of trade distributors, retailers, wholesalers and project developers.

Luceco operates a fully integrated operating model which includes wholly-owned manufacturing and product development facilities in the UK and China.

### Our policies

We operate internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Employee code of conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Our suppliers

Before we select a supplier, we conduct due diligence assessment. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their supply chain
2. They hold their own suppliers to account
3. We may terminate our contract with the supplier if instances of modern slavery have been found

### Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if: no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### Approval for this statement

Authorised for and on behalf of Luceco plc:



Name (Director): David Main

Signature

Date: 21/02/2017