

## MODERN SLAVERY STATEMENT

### Introduction

Luceco Plc is committed to preventing modern slavery and human trafficking in all aspects of its business and supply chains. We recognise our responsibility to uphold ethical labour practices and ensure fair treatment of all individuals involved in our operations.

This statement outlines the steps we take to assess and mitigate modern slavery risks, enforce compliance across our supply chain, and continuously improve our approach to ethical sourcing. It reflects our ongoing commitment to transparency, accountability, and adherence to the UK Modern Slavery Act 2015.

### Group Structure and Supply Chains

This statement covers the activities of Luceco Plc, a leading manufacturer and distributor of high-quality, innovative wiring accessories, EV chargers, LED lighting and portable power products, supplying a global customer base. Our operations span multiple countries, supplying trade distributors, retailers, wholesalers, and project developers.

Luceco operates a fully integrated model, with wholly owned manufacturing and product development facilities in the UK and China. This structure allows us to maintain control over costs, product quality, and labour conditions.

The Group currently operates in the following locations:

- **United Kingdom** – Product assembly, distribution warehouse, and Head Office (including Kingfisher Lighting, DW Windsor, D-Line & CMD) with 709 employees
- **Germany** – Sales and distribution (1 employee)
- **Spain** – Sales and distribution (24 employees)
- **Dubai** – Sales and distribution (24 employees)
- **Mexico** – Sales and distribution (30 employees)
- **Jiaxing, China** – Manufacturing and product development (844 employees)
- **Ireland** – Sales (7 employees)

We assess modern slavery risks by evaluating each country's labour laws, human rights records, and industry practices. For new operational territories, the Board of Directors conducts a full assessment, considering local regulations, community impact, and supply chain sustainability.

For new suppliers, the Procurement and Supply Chain Teams carry out rigorous due diligence, including site inspections, before engagement. The Group sources the majority of its raw materials from suppliers near our Jiaxing, China facility, where stringent annual technical and ethical audits are conducted.

Where suppliers fail to meet our Supplier Code of Conduct, a corrective action plan is developed, with our team working closely with suppliers to implement necessary changes. In collaboration with the Chinese Government, we also assist suppliers in obtaining BSCI (Business Social Compliance Initiative) certification.

## Policies and Governance

Luceco Plc has established robust policies to prevent modern slavery and human trafficking, including:

- **Code of Conduct** – Defines ethical expectations for all employees and business partners.
- **Supplier Code of Conduct** – Ensures that suppliers adhere to our strict labour and ethical standards. Non-compliance may result in contract termination.
- **Agency Workers Policy** – Ensures all employment agencies meet ethical labour requirements, including eligibility-to-work checks.
- **Speak Up Policy** – Provides confidential whistleblowing channels for reporting concerns about slavery, trafficking, or unethical practices.

Our **Board of Directors** oversees compliance, while the **Chief Financial Officer (CFO)** holds day-to-day responsibility for **policy implementation, monitoring, and reporting**.

## Risk Assessment and Due Diligence

We actively assess and address risks related to modern slavery through:

- **Supplier Audits** – Annual audits incorporating **ethical and technical assessments**.
- **Risk-Based Supplier Assessments** – Focused scrutiny of suppliers in high-risk regions, particularly in **China**.
- **Third-Party Certifications** – Utilisation of **BSCI and SEDEX** audits to ensure compliance with ethical labour standards.
- **Employee Feedback Mechanisms** – Encouraging reporting via **suggestion boxes and a dedicated email channel** ([idea@luceco.cn](mailto:idea@luceco.cn)) to highlight concerns.

## Training and Awareness

Luceco provides ongoing training for employees and suppliers on recognising and preventing modern slavery. This includes:

- **Mandatory annual training for all employees**, including **senior managers** on modern slavery risks and ethical sourcing.
- **Supplier education programmes** to enhance awareness and compliance.

## Monitoring and Reporting

All employees and stakeholders are expected to report concerns regarding modern slavery. Reports can be made to:

- **Line Managers**
- **Chief Financial Officer** (if escalation is needed)
- **NAVEX global (third-party whistleblowing service)** as per our **Speak Up Policy**

All reports are treated **confidentially**, and investigations are conducted **promptly and thoroughly**. We support and protect whistleblowers who raise genuine concerns in good faith.

## Future Commitments

Luceco Plc is committed to continual improvement in addressing modern slavery risks. Our future initiatives include:

- **Increasing the frequency of unannounced supplier audits.**
- **Enhancing KPIs to measure effectiveness**, such as tracking corrective actions.
- **Expanding training programmes** to all employees, including senior leadership.
- **Strengthening due diligence procedures** when onboarding new suppliers.

## Approval and Review

This statement has been approved by the Board of Directors and will be reviewed annually to ensure its effectiveness and alignment with best practices.

**Signed:**



**John Hornby**

**Chief Executive Officer**

**Date: 22<sup>nd</sup> March 2025**