



**SLAVERY AND
HUMAN
TRAFFICKING
STATEMENT
2018 - 2019**

FW THORPE PLC

STATEMENT FROM THE CHAIRMAN

This statement is made pursuant to Section 54, of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. As a business we are committed to doing all we can to combat slavery and human trafficking. We will update our company policies and procedures and put systems in place which will reflect our zero tolerance approach. We will encourage our suppliers to mirror our values and complement our stance on the issue. We will deliver training to ensure a high level of understanding and promote a company culture where a clear and robust stance against modern day slavery and human trafficking is maintained.



Mike Allcock
Chairman and Joint CEO - FW Thorpe Plc

ORGANISATION STRUCTURE

FW Thorpe Plc designs, manufactures and supplies professional lighting systems in the building and construction sector. It consists of a number of lighting companies specialising in specific sectors of the lighting market. The Group has a global annual turnover in excess of £100m and has over 600 employees. FW Thorpe Plc is predominantly based in the UK but has a number of sales offices and manufacturing locations worldwide. The head office is based in Redditch, where over 400 people are employed and the site contributes £70m to the Group turnover.

OUR BUSINESS

The production facilities at each of the lighting companies are supported by various departments including; Finance, Purchasing and Materials, Human Resources, Quality, Lighting Design, Design and Technical Engineering, Commissioning. We have robust procedures in place for the vetting of new employees and ensuring that we are able to confirm their identities.

OUR SUPPLY CHAINS

The FW Thorpe Plc supply chain comprises approximately 100 mainline product suppliers. These companies are based throughout the world and vary considerably, both in terms of size and amount spent with them. All our product suppliers are subject to an approvals process before they are permitted to supply products. Many hold international quality standards and accreditations and are regularly audited both by the issuing authorities and ourselves to ensure ongoing compliance to quality standards and other regulatory requirements. In addition, we have approximately 500 non-product suppliers, who are predominantly based in the UK. These suppliers are subject to the same due diligence processes as for the product suppliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We will develop an Anti-slavery Policy that reflects our commitment to acting ethically and with integrity in all our business relationships. We will implement and audit effective systems and controls.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Slavery and forced labour can take many forms, including human trafficking or child labour. The FW Thorpe Plc Supplier Code of Conduct* clearly states that we will not tolerate forced labour or child labour in our operations or in the supply chain. FW Thorpe Plc Group companies will not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour.

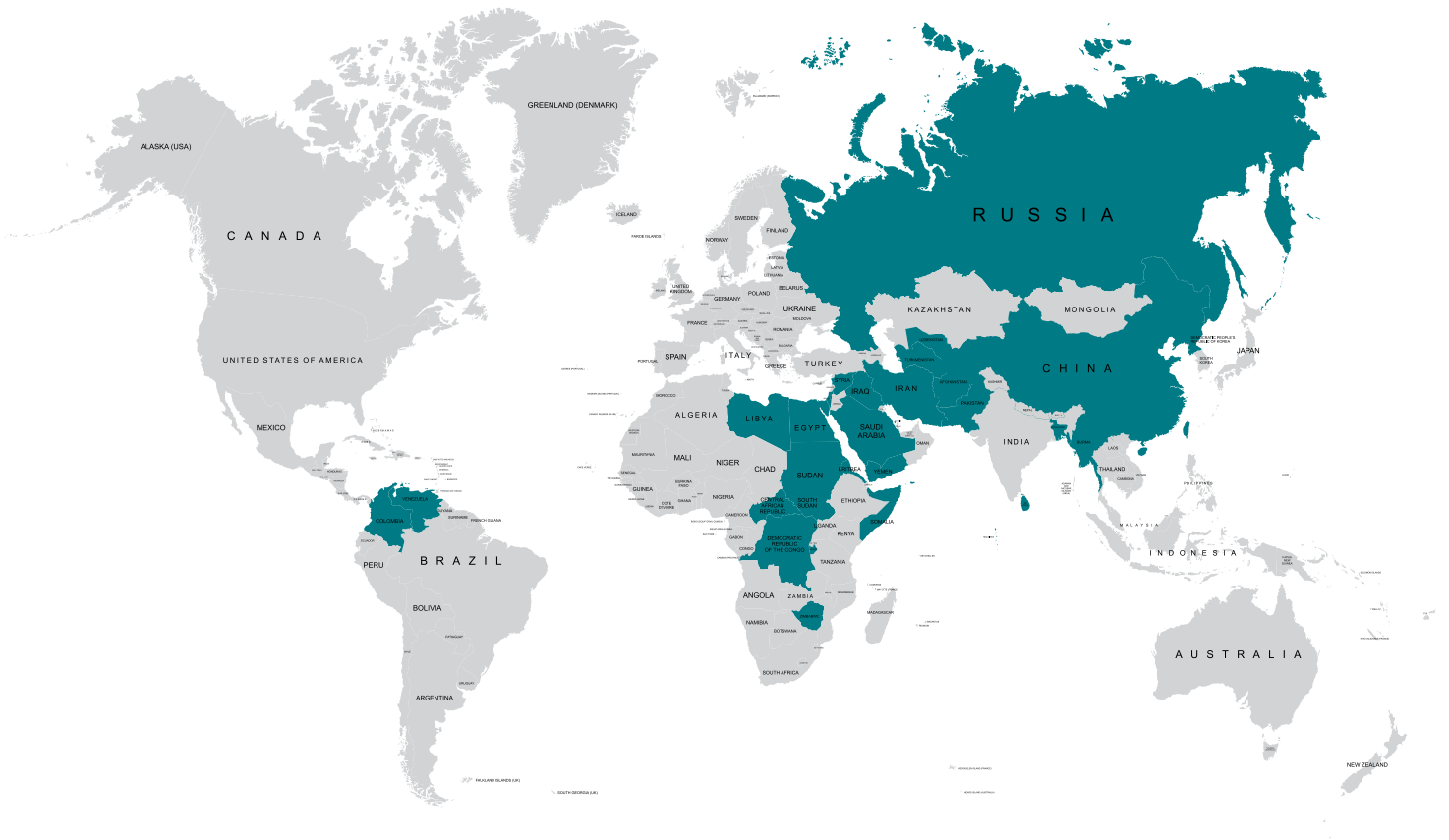
Our processes include actions to safeguard against human rights abuses in our supply chain, including;

- building long standing relationships, where possible, with local suppliers and making clear our expectations of business behaviour.
- mitigating risk by encouraging sourcing from UK, European or US suppliers as we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- maintaining contact with a UK/European company or branch, where the supplier is outside the geographical locations stated above, as we would expect them to adopt due diligence on the next link in the chain. For these suppliers a periodic audit of their premises will be conducted to observe their operations, make clear our expectations of behaviour and ensure compliance with slavery and human trafficking laws.
- assessing the risk of any additional suppliers based on geographical location. This risk assessment is performed with input from external stakeholders, such as the FCO (*Human Rights and Democracy: The 2018 Foreign and Commonwealth Report*, published 5 June 2019) and United Nations. Any higher risk suppliers will be asked to sign our Supplier Code of Conduct document confirming that they, and their supply chains, conform to our Slavery and Human Trafficking policy. A periodic audit of their premises will be conducted to ensure compliance with slavery and human trafficking laws (see fig.1).
- encouraging the reporting of concerns and safeguard of whistle blowers.

* Available to view at:
www.fwthorpe.co.uk/pdf/fwthorpe-supplier-code-of-conduct.pdf

fig.1

HUMAN RIGHTS AND WORKING CONDITIONS FOCUS COUNTRIES



AMERICAS

Colombia and Venezuela

ASIA

Afghanistan, Bangladesh, Burma, China, Democratic People's Republic of Korea, Maldives, Pakistan, Sri Lanka, Turkmenistan and Uzbekistan

EUROPE, MIDDLE EAST AND AFRICA

Bahrain, Burundi, Central African Republic, Democratic Republic of Congo, Egypt, Eritrea, Iran, Iraq, Israel and the Occupied Territories, Libya, Russia, Saudi Arabia, Somalia, South Sudan, Sudan, Syria, Yemen and Zimbabwe

SUPPLIER ADHERENCE TO OUR VALUES

We have a zero tolerance stance on slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

We have a cross-functional compliance team which consists of Directors and senior managers from the following departments, Human Resources, Purchasing, Materials Project Management and Design, that will co-ordinate all the necessary activities to ensure FW Thorpe Plc complies with the requirements of the Act.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking, we will provide training to the procurement team and relevant members of our senior management team. All Directors have been briefed on the subject.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

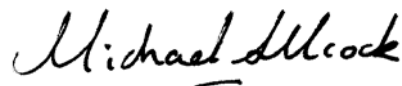
We will measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains by monitoring and recording;

- the number of employees trained in the Modern Slavery Act 2015
- the number of suppliers that confirm that their organisations are slavery and human trafficking free.

FURTHER STEPS

We will periodically review the effectiveness of the steps we have taken to ensure there is no slavery or human trafficking in our supply chains by continuously improving any policies, procedures and systems that we have implemented.

This statement constitutes the FW Thorpe Plc slavery and human trafficking statement for the financial year ending 2018 - 2019. It has been formally approved by the Board of FW Thorpe Plc on the 21st February 2020 and signed on its behalf by Mike Allcock, Chairman and Joint Chief Executive Officer.



Mike Allcock
21st February 2020
Chairman and Joint CEO - FW Thorpe Plc

This statement covers the following FW Thorpe Plc subsidiary companies:

Thorlux Lighting	Solite Europe Ltd
Thorlux Lighting Ireland	Portland Lighting Ltd
Thorlux Lighting Deutschland	TRT Lighting Ltd
Thorlux Lighting Australia Pty Ltd	Lightronics BV
Thorlux Lighting LLC	Luxintec
Philip Payne Ltd	Famostar BV