

SLAVERY ACT AND HUMAN RIGHTS TRAFFICKING STATEMENT

INTRODUCTION

This statement is made pursuant to Section 54.1 of the Modern Slavery Act 2015 and constitutes the Fern Howard Ltd Slavery and Human Trafficking Statement for the financial year ending December 2020.

This statement has been approved by the Directors of the Company.

A. OUR BUSINESS

Fern Howard Ltd operates the manufacture and supply of Lighting Products to various Commercial Industry businesses within the UK. Technical expertise has always been at the forefront of Fern Howard Lighting. Formed as a supplier of electrical assemblies to the lighting industry we are now a market leading manufacturer of energy efficient lighting.

By investing heavily in product development and manufacturing automation and by placing importance on innovative ways to help installers work more efficiently, such as Time-in-a-Box concept, we create lighting that is simple and specify, install and use- lighting that makes life better for specifiers, for installers and for end-users alike.

B. OUR STRUCTURE

The nature of our business has evolved over recent years from a manufacturing and distribution company based in the UK to manufacturing in Vietnam. Marketing, Sales and the Distribution of our products continues to develop in the UK.

1. OUR POLICY STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that modern slavery or human trafficking are eliminated from our business and expect our suppliers to have a similar approach to this.

1.1 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 in order 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 implement and enforce an effective system and controls

to guard against modern slavery taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partner, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity and this includes employees at all levels as well as directors, agents and contractors, consultants or third-party representatives.

1.4 This policy does not form part of an employee's contract of employment, and we may review and amend at any time.

2. OVERSEEING THE IMPLEMENTATION OF THIS POLICY

2.1 The Company's Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Company Management have primary and day to day responsibility for implementing this policy, in monitoring its effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in preventing modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

3. COMPLIANCE

3.1 You are required to read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

3.4 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager.

3.5 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier tier at the earliest stage.

3.6 If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any form of modern slavery you are required to raise it with your manager.

4. OUR DUE DILLIGENCE PROCESSES

4.1 As part of our ongoing commitment to prevent modern slavery we aim to review our policies regularly to ensure there is no risk of slavery or human trafficking in our business.

4.2 In order to ensure a high level of understanding of the risks of any modern slavery and human trafficking in our supply chains and our business we aim to make our staff aware of any signs or indicators of modern slavery.

4.3 We aim to ensure that now, and in the future, there is no risk of modern slavery or human trafficking in our business. We intend to review our existing business policies and to share this with our supply chains and impress upon the need to adopt a similar policy.

Signed on behalf of Fern Howard Ltd

Andy Bicknell - HR Manager

Date: November 9th, 2022