

## **LUCY GROUP SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR 2021**

### **INTRODUCTION**

Lucy Group Limited is a relevant commercial organisation within section 54 of the Modern Slavery Act 2015. This transparency in supply chain statement is made by Lucy Group Ltd as parent company on behalf of all group companies including Lucy Electric UK Limited which is itself a relevant commercial organisation within section 54 of the Modern Slavery Act 2015.

### **THE GROUP'S STRUCTURE**

We are a global manufacturing and property business operating through three diverse business units as explained below. Lucy Group Limited is the parent company of several companies based in the UK and abroad (together the "Group"). In 2021 the Group had over 1487 employees worldwide operating in the UK, India, the Middle East, Africa, Asia and South America.

### **THE GROUP'S BUSINESSES**

The Group's business is organised into three diverse business units: Lucy Electric, Lucy Controls and Lucy Real Estate, supported by head office in Oxford. Lucy Electric and Lucy Controls both operate domestically and internationally with Lucy Real Estate operating only in the UK. Lucy Electric manufactures and sells high-performance medium voltage switchgear for utility, industrial and commercial applications. Lucy Controls has two distinct UK-based businesses: Lucy Zodion which manufactures and sells street lighting control systems and Lawson Fuses Ltd which manufactures high-rupturing capacity (HRC) low voltage fuses. Lucy Real Estate owns, lets and manages a substantial property portfolio and develops residential property for sale in Oxfordshire.

### **THE GROUP'S SUPPLY CHAINS**

Lucy Electric's supply chain is partly internal as various group companies supply goods and services to each other. Lucy Electric also has a significant domestic and international supply chain with most suppliers located near its manufacturing locations in the UK, Saudi Arabia, UAE, India, Thailand and Brazil. Within Lucy Controls, Lucy Zodion's supply chain is mainly domestic situated near its factory in Sowerby Bridge with suppliers in Asia Pacific and Europe as well as internal group suppliers. Lawson Fuses Ltd is based in Newcastle with its main suppliers based in the UK and India. Lucy Real Estate's supply chain is all UK-based with the majority based in Oxfordshire.

### **THE GROUP'S POLICY ON SLAVERY AND HUMAN TRAFFICKING, RELATED PROCESSES AND SUPPLIER DUE DILIGENCE**

We remain committed to improving our practices to combat slavery and human trafficking as set out in our Anti-slavery Policy: <http://lucygroup.com/files/2814/9061/4908/Lucy-slavery-doc.pdf>. As part of our on-going efforts to identify and mitigate risk our steering committee, set up in 2016, comprised of representatives from each business unit and Lucy Group Ltd, continues to meet regularly to oversee the Group's continuing compliance with the Modern Slavery Act. The main aim of the committee is to ensure there are systems in place in all business units to identify, assess and monitor potential risk areas in our supply chains and that all businesses continue to improve their supplier vetting processes. We encourage a culture of continuous improvement. Our business units have improved supplier vetting processes including processes for existing suppliers to ensure we are sensibly addressing the risks within our supply chain. We will continue to engage with all our suppliers across all business units to ensure their compliance with the Modern Slavery Act.

### **SPONSORSHIP**

We donated money to Justice in Motion's parour production promoting awareness of modern slavery contributing a substantial part of their costs in putting on their production.

### **SUSTAINABLE DEVELOPMENT FRAMEWORK**

Lucy Group is committed to a sustainable future and has created a Framework based on the United Nations Sustainable Development Goals (UN SDGs) to place people and the planet at the heart of everything we do. Our selected goals and targets concentrate on the material issues relevant to the

Group by providing a balanced approach across three interlinked pillars: People, Planet and Progress.

The Group focuses on supporting our people and the communities where we are present by operating ethically and sustainably to reduce our negative impacts. To ensure our social, environmental, and ethical standards are met, we seek responsible suppliers who share our commitment to sustainability, both within their businesses and across their supply chains. By engaging with our suppliers, we aim to develop a culture of prosperity, collaboration and integrity while protecting the vulnerable and those at risk of exploitation.

We expect suppliers to sign up to our Supplier Code of Conduct, which outlines our expectations on ethical behaviours and compliance with applicable laws, including human rights and labour rights, preventing slavery and forced labour and allowing freedom of association where permitted by law. We assess our suppliers' risk regarding Modern Slavery through a detailed questionnaire and suppliers who cannot show commitment to addressing such risks are removed as soon as practicable

### **NEXT STEPS**

In addition to the efforts outlined above during the 2022 financial year and beyond we intend to take the following further steps to reduce the risks of slavery and human trafficking occurring within our businesses and that of our supply chains:

- We are prioritising a number of the UN Sustainable Development Goals that the Group can contribute towards, and we will measure our progress and will, when practicable, widen our focus to further SDGs.
- We continue to progress the Global Procurement Policy internally with additional support from an international consulting firm.
- We are rolling our refresher training on various compliance issues including modern slavery for staff within Lucy Real Estate to ensure staff are better equipped to deal with any concerns in our supply chains.
- We continue to make it our endeavour not to be complacent as we are only too aware that slavery and human trafficking continue to be major problems globally including in the UK.
- The Steering Committee will continue to oversee and co-ordinate the Group's on-going compliance with the Modern Slavery Act.

This statement is approved by the Board of Lucy Group Ltd and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Lucy Group Ltd on behalf of all group companies including Lucy Electric UK Limited for the financial year ending 31 December 2021.



**RICHARD DICK, EXECUTIVE CHAIRMAN  
LUCY GROUP LTD**

Date: 9 June 2022