

LUCY GROUP SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR 2020

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 2020 the Group had over 1425 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 focus 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. Following last year's change to our external whistleblowing service provider we have publicised our new

enhanced external whistleblowing service to all staff globally so they are aware that they can raise any concerns they may have.

SUSTAINABLE DEVELOPMENT FRAMEWORK

We are preparing to launch our new framework for sustainable development built on three equally important pillars: Social, Environmental and Economic. Social aspects will focus on the correlation of our systems and processes to support healthy and sustainable communities. In particular, we recognise fair labour practices and wages within our businesses and supply chain. We appreciate the importance of achieving a sustainable future not only for our businesses but for our employees and suppliers and the local communities and environments in which we operate all over the world.

NEXT STEPS

We believe the various efforts outlined above should help reduce the risk of modern slavery and human trafficking occurring within our businesses and that of our supply chains. During the 2021 financial year and beyond we intend to take the following further steps to further reduce the risks of slavery and human trafficking occurring within our businesses and that of our supply chains:

- We are evaluating a number of the UN Sustainable Development Goals that the Group can contribute towards, and within this we may reappraise and review our policies and controls to meet the requirements of the Economic, Social and Environmental goals we have selected. Any changes in our approach to combatting Modern Slavery under these goals will be identified and a plan to roll out any required changes will be set out in next year's return.
- We continue to make a real effort 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 meet 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 2020.



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

Date: 7 June 2021