

Modern Slavery and Human Trafficking Statement 2018

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 to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2018.

Organisational structure

We are a provider of emergency lighting products and systems primarily in the healthcare, education, public buildings and leisure sectors of the UK market.

P4 was established in 1989 and are majority owned by the Polynom Group AG of companies based in Switzerland. We have a wholly owned subsidiary called Lux Box Lighting Technology Limited supplying similar products into the UK and European markets and we are partners in OVA JMR LLP also supplying similar products into the UK markets. We currently employ approximately 35 at our headquarters in Fakenham, Norfolk and from home bases throughout the UK.

Our expected annual turnover in 2018 is around £4,500M.

Our supply chains

We intend to carry out an audit of our supply chains to map the sources of all of our regular purchases and a risk assessment / analysis of the integrity of sources and their adherence to the slavery and human trafficking policies to which we subscribe and endorse.

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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Workplace policies considered to be particularly relevant and included in our Staff Handbook include:

- Equal opportunities policy (Recruitment and selection)
- Anti-corruption and Bribery Policy
- Whistleblowing policy

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme, including:

- Audit of all supply chains to assess sources of materials and services.
- Communication with all suppliers to request copies of Modern Slavery statements
- Notification to suppliers that confirmation of compliance with Anti-Slavery Measures is a requirement of continuing business between us.
- Awareness training of all current staff
- Inclusion of Modern slavery awareness in induction training

We have assembled a compliance team, which consists of involvement from the following departments:

- Manufacturing
- Business management (Quality Management)
- Human resources
- Sales and marketing.

The compliance team is led by Alan Daniels, who will lead quarterly review meetings.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide intend to provide training to our staff. We also will require our business partners to provide training to their staff and suppliers and providers.

Our effectiveness in combating slavery and human trafficking

P4 Limited uses appropriate key performance indicators (KPIs) to assess 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.

We use the following KPIs in 2018:

- % of supply chain reviewed and assessed for compliance with Modern slavery and Human Trafficking legislation
- % of suppliers confirming compliance with above
- % of staff to whom Modern slavery and Human Trafficking awareness training has been delivered.

Further steps

Following a review of the effectiveness of the steps we have taken during 2017 to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Require all staff to complete training on modern slavery
- Develop a system for supply chain verification
- Review existing supply chains

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ALAN DANIELS – DIRECTOR, P4 LIMITED