

Modern Slavery and Human Trafficking Policy Statement

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 year 2024.

Organisational Structure

Lux Box is a provider of emergency lighting products, components and accessories and re-engineered luminaires for emergency lighting use.

Lux Box has been operating since 2017. Lux Box owned by P4 Ltd is part of the Polynom group owned by the KAMIC Group. Polynom Group which has over 50 years of knowledge and experience with the emergency lighting sector and related industries. This knowledge is kept up to date through being members of trade bodies such as the ICEL & LIA, and the company's involvement with Trade Fairs, Test Houses, Customers and Supplier meetings. We currently employ approximately 10 employees at our headquarters in Fakenham, Norfolk and from home bases throughout the UK.

Our Commitment to The Principles of The Modern Slavery Act 2015

Lux Box is committed to the principles of the Modern Slavery Act 2015. To the abolition of modern slavery and human trafficking.

Lux Box are an equal opportunity employer and are committed to creating and ensuring a non-discriminatory and respectful working environment to all employees. Lux Box want all employees to feel confident that they can expose wrongdoing without any risk to themselves.

The company's recruitment process and management of people processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Lux Box do not knowingly enter into business with any organisation, in the UK or abroad, which supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our Supply Chains

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.

Where feasible Lux Box shall use UK suppliers, however, do use suppliers based worldwide. All suppliers are subjected to the same diligence processes and complete a supplier questionnaire. Each supplier shall be assessed prior to them becoming an approved supplier to Lux Box.

Lux Box may carry out an audit of our supply chains to map the sources of all of our regular purchases as a result of 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

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 a supplier where a risk is identified, 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:
 - A Director
 - Business System Management (Quality Management)
 - Purchasing

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 training to our staff.

Our Effectiveness in Combating Slavery and Human Trafficking Objectives for the following year

Following a review of the effectiveness of the steps we have taken 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 relevant staff to complete training on modern slavery.
- Review existing supply chains.
- Continuing to risk assess existing supply chains.
- Assess all new suppliers through the use of the new supplier form (LB.F.36).
- Supplier reviews shall be held at the management review meetings.
- Suppliers without their own Modern Slavery and Human Trafficking Policy Statement shall be requested to sign our Modern Slavery and Human Trafficking Policy Statement LB.D.44a.

A handwritten signature in dark ink, appearing to read "R. Warner".

Rob Warner
Lux Box Managing Director
02/09/2025