



# Slavery and Human Trafficking Statement 2023 - 2024

**FW THORPE PLC**

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the steps our Company has taken between 1 July 2023 and 30 June 2024 (FY24) to ensure that slavery and human trafficking are not present in our supply chains or any part of our business. We are dedicated to combating slavery and human trafficking in all forms. To this end, we continuously improve our company policies and procedures and implement systems that reflect our zero-tolerance approach. We ensure that our suppliers are aligned with our values and support our stance on this issue. Additionally, we provide training to ensure a high level of understanding and foster a company culture that maintains a clear and robust stance against modern slavery and human trafficking.

We have a responsibility, both as a business and as individuals, to support and promote ethical and lawful business practices within our operations and supply chain.

## 1. Introduction and Organisational Structure

FW Thorpe Plc will not tolerate any form or practice that constitutes modern slavery or human trafficking in any part of its organisation and is determined to take necessary actions to safeguard the rights of our employee's and workers in accordance with our policies and procedures.

This is a group statement, made on behalf of FW Thorpe Plc and its subsidiary companies.

## 2. Our Company & Suppliers

FW Thorpe Plc designs, manufactures, and supplies professional lighting systems for the building and construction sector. The company comprises eight core lighting companies, each specialising in specific market sectors.

While FW Thorpe Plc's sales and manufacturing operations are primarily based in the UK, operations in the Netherlands and Spain are growing in importance, now accounting for around 30% of sales. The Group also has sales offices in several other locations worldwide and the head office is in Redditch.

FW Thorpe Plc collaborates with local partners, distributors, manufacturers, and supply chains across the world. We expect the same commitment to ethical business practices as FW Thorpe Plc upholds and that effective control processes, procedures and services are implemented and adhered, to ensure that appropriate steps are taken to eradicate any form of modern slavery or human trafficking. The workplace practices that we expect from our suppliers include:

- Exclusion of slave labour, illegal child labour or forced labour.
- Ensure that the overall terms of employment are without duress and voluntary.
- Demonstrate that they provide safe working conditions.
- Follow all local applicable laws pertaining to minimum age requirements, wages, overtime and benefits.
- Conform with the local applicable laws pertaining to the number of hours worked in a seven-day week.
- Periodically certify that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding modern slavery and human trafficking of the country or countries in which they operate.

Suppliers must be able to demonstrate compliance with this policy at the request and satisfaction of FW Thorpe Plc. FW Thorpe Plc will conduct internal verification of product supply chains to evaluate and address risks of modern slavery and human trafficking.

### 3. Our Code and Human Rights policy

The FW Thorpe Plc Company Handbook and Human Rights policy together reinforce our stance for the elimination of all forms of modern slavery and human trafficking. Our policy is based upon our values and ethics and applies to all employees of FW Thorpe Plc worldwide.

All employees and workers have a duty and responsibility to immediately highlight any concern without fear of retribution should they believe that something is potentially unsafe, unethical, harmful or a violation of human rights.

Our employees are empowered to speak up, and it is actively endorsed if they have any concerns or questions, which they can do so with their manager or using the confidential helpline

Within the UK: **0800 0280199**

Or email to [letstalk@thorlux.co.uk](mailto:letstalk@thorlux.co.uk)

Alternatively, they may seek guidance through their local government site or externally via modern slavery helpline (UK) or International Labour Organization.

### 4. Modern Slavery and Human Trafficking Risk Assessment

We continuously review and monitor the risk of modern slavery and human trafficking within our business and supply chains to ensure that all our suppliers adhere to our Supplier Code of Conduct and comply with local legislation regarding employment and labour rights. Additionally, our purchasing practices, which influence supply chain conditions and contracts, are designed to ensure that pricing is realistic and negotiated with the prevention of modern slavery and human trafficking in mind. Where appropriate, we also require our suppliers to provide their own modern slavery statements.

### 5. Training

FW Thorpe Plc's employees are aware of our commitment to upholding human rights and the potential impacts within our business. We will provide ongoing training to our employees, particularly those with direct responsibility for supply chain management, on relevant laws and FW Thorpe Plc's policy against modern slavery and human trafficking.

### 6. Our commitment & plans for the next financial year

The FW Thorpe Plc leadership team continues to conduct reviews to ensure that our operating plans manage any potential risks of modern slavery and human trafficking in line with our strict policies. We are committed to improving our understanding and management of the risks associated with modern slavery and human trafficking. We will evolve our risk reviews, refine our practices, and continue to build capability and awareness within our business.

We aim to further strengthen our approach to managing modern slavery risk in our supply chain by focusing on suppliers located in any of the 32 countries identified as human rights priorities on the gov.uk website. Furthermore, we continue to align our approach across all FW Thorpe Plc companies to ensure consistency of process in monitoring and combating modern slavery in our supply chains by developing a more formal desktop risk assessment process for our suppliers.

Where practical, we will engage with suppliers on a face-to-face basis to make clear our expectations of labour and ethical behaviour and conduct inspections to ensure compliance with slavery and human trafficking laws.

This statement constitutes the FW Thorpe PLC slavery and human trafficking statement for the financial year ending 30 June 2024. It has been formally approved by the Board of FW Thorpe Plc on 21 November 2024 and signed on its behalf by Mike Allcock, Chairman and Joint Chief Executive Officer.



Mike Allcock 18th December 2024  
Chairman - FW Thorpe Plc

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This statement covers the following FW Thorpe Plc subsidiary companies:

Thorlux Lighting / Thorlux Lighting Ltd Ireland / Thorlux Lighting Australasia PTY Ltd / Philip Payne Ltd / Solite Europe Ltd / Portland Lighting Ltd / TRT Lighting Ltd / Ratio / Lightronics B.V. / Famostar Emergency Lighting B.V. / Electrozemper S.A. / SchahLED Lighting GmbH

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