



Modern Slavery and Human Trafficking Statement for the Financial Year 24/25

Green Lighting Ltd.

Introduction

Though GL (Green Lighting Ltd) are not obliged to write a Modern Slavery and Human Trafficking Statement under the Modern Slavery Act 2015, we believe that it is important to show our commitment to ensuring no such practices take place within our supply chain. We have a zero-tolerance approach to slavery, servitude, forced labor and human trafficking within all aspects of our business and encourage an environment in which individuals at all levels report concerns, however small, regarding any aspects of our supply chain.

Company Structure and Supply Chains

GL (Green Lighting Ltd.) are a UK based company which supplies lighting products primarily to the UK housebuilding market. We have several different supply chains from different areas in the world. Our core products are designed within the UK and manufactured in Hong Kong and China. We also have several ranges of decorative products which are sourced from designers within the EU.

Policies

At GL (Green Lighting Ltd.), we have many policies in place to ensure that our zero-tolerance attitude towards modern slavery is contained throughout our entire supply chain. This can be seen in our Anti-Slavery and Human Trafficking Policy. As stated in this policy, our supplier Code of Conduct, which is signed by all companies that supply products or components to GL, ensures that all members of our supply chain act according to our own policies, as well as the laws of their own countries. This can also be seen in our Ethical Sourcing Policy.

If there is any concern from any levels of our supply chain of an organization not working within the scope of our policies, then they are encouraged to report this through our reporting system, as defined in our Whistleblowing Policy. We will investigate any reports, no matter how small reporting further where necessary.

Due Diligence

In order to ensure our products are being produced to the quality that our customers have come to expect from us, we audit our factories annually. During these audits, we don't only ensure our products are being made to our specification, but also that they are being made in accordance with our policies and Code of Conduct.

Where feasible, second-tier suppliers are audited directly by GL (Green Lighting Ltd) auditors. Where this is not possible, first-tier suppliers are required to do their own audits. These audits include a detailed questionnaire to help identify risk and levels of competence for reacting to possible non-conformities. Second-tier suppliers are also required to sign the GL (Green Lighting Ltd) Code of Conduct.

Our policies, procedures and other systems in place across our supply chain are designed to: -

- Identify inappropriate employment practices
- Identify and assess other potential risk areas
- Mitigate the risk of slavery and human trafficking occurring
- Monitor potential risk areas
- Protect whistleblowers

Risk Assessment and Management

GL (Green Lighting Ltd.) have always had a strong focus on ensuring that the companies we have working for us work ethically though, from the introduction of the Modern Slavery Act 2015, we have increased our observation of all aspects of the legislation.

We understand that the areas of greatest risk within our supply chain are in our non-EU factories. This is due to there being laws that would apply in the UK that may not be followed within countries throughout world. To manage this risk, we focus more of our time on ensuring we select reputable suppliers across China and Hong Kong, working closely with them to ensure their understanding of and compliance to legislation and our policies.

Actions Taken

In order to minimise risk, GL (Green Lighting Ltd.) focuses more on using examining suppliers who have already proven that we can trust them to work to our standards and policies. Though these shortlisted suppliers of both products and components are working within our guidelines, with them declaring their own compliance, we still ensure that audits are done regularly to ensure no changes to working practices have taken place that may affect the safety and security of the staff and our customers.

Where we must expand and use new suppliers, we ensure all their policies and working practices are up to date and at an appropriate level. The supplier must be able to show that they meet all our pre-qualification criteria for us to consider using them for our products or components, including working ethically under the Modern Slavery Act 2015. We understand that there is a higher level of risk with new suppliers, so audits are done annually, as with all our suppliers, but these new colleagues will be visited more frequently throughout the year to ensure everything is running smoothly.

Training

We ensure that all our policies here at GL (Green Lighting Ltd.) are understood and implemented by all members of staff, at all levels. This is achieved by ensuring managers of each area of the business have a full understanding of what we require from our business and feed this information to their individual departments and teams.

With our suppliers outside of our own company, training is given during annual audits on ethical trading, which includes Modern Slavery. This ensures that the need to comply with our policies is reiterated regularly, making our Code of Conduct clear to our suppliers.

We have found that our training has allowed our suppliers to understand ethical working practices better and we will continue to train the companies we work with going forward, checking progress during each of our annual audits.



Signed:
(Anthony Ottway, Managing Director)

Date: 01/04/25