



Slavery and Human Trafficking Statement 2024 - 2025

FW THORPE PLC

This statement is issued in compliance with Section 54 of the Modern Slavery Act 2015 and sets out the actions our Company has taken during the period 1 July 2024 to 30 June 2025 (FY25) to prevent slavery and human trafficking within our operations and supply chains. We remain committed to eradicating all forms of modern slavery and human trafficking. To uphold this commitment, we continually strengthen our policies and procedures and implement systems that reflect our zero-tolerance approach. We work closely with our suppliers to ensure alignment with our values and expectations. Furthermore, we provide targeted training to enhance awareness and foster a culture that maintains a clear and robust stance against modern slavery.

We recognise our responsibility - both as an organisation and as individuals - to promote ethical and lawful practices throughout our business and supply chain.

1. Introduction and Organisational Structure

FW Thorpe Plc maintains a zero-tolerance approach to modern slavery and human trafficking in any form within its operations. We are committed to taking all necessary measures to protect the rights and wellbeing of our employees and workers, in line with our established policies and procedures.

This statement is issued on behalf of FW Thorpe Plc and all subsidiary companies as a unified group commitment.

2. Our Company & Suppliers

FW Thorpe Plc is a leading designer, manufacturer, and supplier of professional lighting systems for the building and construction sector. The Group consists of twelve companies, each focused on distinct market segments.

While our core sales and manufacturing operations are based in the UK, our presence in the Netherlands and Spain continues to grow, now representing approximately 30% of total sales. We also operate sales offices in multiple international locations, with our head office located in Redditch.

FW Thorpe Plc works closely with global partners, distributors, manufacturers, and supply chains. We expect all partners to uphold the same high standards of ethical business practices that we maintain. This includes implementing robust controls and procedures to eliminate any risk of modern slavery or human trafficking.

Our expectations for suppliers include:

- Prohibition of slave labour, illegal child labour, or forced labour.
- Ensuring employment terms are voluntary and free from coercion.
- Providing safe and healthy working conditions.
- Compliance with all local laws on minimum age, wages, overtime, and benefits.
- Adherence to legal limits on working hours per week.
- Periodic certification confirming compliance with these standards and that all materials used meet applicable laws on modern slavery and human trafficking.

Suppliers must demonstrate compliance upon request. FW Thorpe Plc conducts internal verification of supply chains to identify and address any risks related to modern slavery or human trafficking.

3. Our Code and Human Rights policy

The FW Thorpe Plc Company Handbook, together with our Human Rights Policy, underpins our commitment to eliminating all forms of modern slavery and human trafficking. These policies reflect our core values and ethical principles and apply to every FW Thorpe Plc employee worldwide.

All employees and workers share a responsibility to raise concerns immediately, without fear of retaliation, if they believe something may be unsafe, unethical, harmful, or a violation of human rights. We actively encourage and support speaking up. Concerns or questions can be reported to a manager or through our confidential helpline:

- UK Helpline: 0800 028 0199
- Email: letstalk@thorlux.co.uk

Alternatively, employees may seek guidance via their local government resources or external organisations such as the UK Modern Slavery Helpline or the International Labour Organisation.

4. Modern Slavery and Human Trafficking Risk Assessment

We conduct ongoing reviews and monitoring to identify and mitigate the risk of modern slavery and human trafficking within our operations and supply chains. All suppliers are required to comply with our Supplier Code of Conduct and adhere to local employment and labour legislation.

Our procurement practices are aligned with ISO 20400 Sustainable Procurement Guidelines, ensuring that purchasing decisions support ethical, social, and environmental responsibility. This includes:

- Designing purchasing processes that promote transparency and fairness.
- Negotiating realistic pricing structures to avoid undue pressure on suppliers that could lead to exploitative practices.
- Integrating risk assessment into supplier selection and contract management to prevent modern slavery and human trafficking.

Where appropriate, we require suppliers to provide their own modern slavery statements and demonstrate compliance with relevant legislation. These measures form part of our broader commitment to sustainable procurement and responsible supply chain management.

5. Training

FW Thorpe Plc employees are fully aware of our commitment to upholding human rights and the potential impacts within our business and supply chains. We provide ongoing training to all staff, with a particular focus on those directly involved in procurement and supply chain management. This training covers relevant legislation, our Human Rights Policy, and FW Thorpe Plc's zero-tolerance approach to modern slavery and human trafficking.

By equipping our teams with this knowledge, we ensure that ethical practices are embedded throughout our operations and supplier relationships.

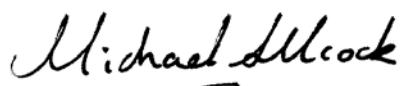
6. Our commitment & plans for the next financial year

The FW Thorpe Plc leadership team regularly reviews our operating plans to ensure that potential risks of modern slavery and human trafficking are effectively managed in line with our strict policies. We remain committed to deepening our understanding of these risks and continuously improving our approach. This includes evolving our risk assessments, refining practices, and building capability and awareness across the business.

To strengthen our supply chain oversight, we will prioritise engagement with suppliers located in any of the 32 countries identified as human rights priorities on the UK government website. We are also working to standardise processes across all FW Thorpe Plc companies by developing a formal desktop risk assessment framework for suppliers, ensuring consistency in monitoring and compliance.

Where practical, we will engage directly with suppliers to communicate our expectations regarding labour standards and ethical conduct, and we will carry out inspections to verify compliance with modern slavery and human trafficking laws.

This statement constitutes FW Thorpe Plc's slavery and human trafficking statement for the financial year ending 30 June 2025. It was formally approved by the Board of FW Thorpe Plc on 20 November 2025 and signed on its behalf by Mike Allcock, Chairman.



Mike Allcock 16th January 2026
Chairman - FW Thorpe Plc

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. / SchahlLED Lighting GmbH
