



Modern Slavery and Human Trafficking Policy

1. Introduction and Policy Statement

The Modern Slavery Act 2015 mandates that Lockwell Electrical prepares a slavery and human trafficking statement each financial year.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world. They are a violation of fundamental human rights.

Lockwell Electrical will not tolerate or condone slavery or human trafficking in any part of our organisation. We have a zero-tolerance approach to modern slavery and human trafficking and are totally committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect this.

2. Our Business

The economic, social and environmental footprint of our business activity is a fundamental consideration in our commitment to responsible and sustainable business growth.

Lockwell Electrical provides a dedicated service to trade and industry combining a wide range of high quality and cost effective 'branded' products with local personal service to make us one of the UK's largest and most highly respected electrical distributors.

3. Responsibility for the Policy

The Directors and senior management team at Lockwell Electrical have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf comply with it.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

4. Commitment

Lockwell Electrical has over 1400 active direct suppliers of goods and services, 98.9% of which are UK based. We do not trade directly with any companies based in the highest risk countries*

Periodically, our major suppliers are required to complete a Questionnaire and provide a copy of their Modern Slavery and Human Trafficking Policy where applicable.

Internally, our Policy Statement is available to all employees via the company's intranet system and is specifically referred to in our Handbook of Employment which is issued to all Employees and this issue evidenced accordingly.

5. Compliance

All persons working for us in any capacity must:

- Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy.

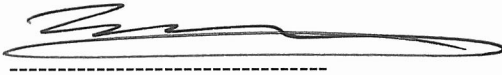
- Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. We have systems in place for individuals to report concerns, anonymously if preferred, and to protect whistleblowers.

6. Ongoing Review

Lockwell Electrical will review both its supply chain and internal operations on an ongoing basis to consider compliance with the above policy, and to check that our policy is being implemented effectively.

The Directors and senior management team will review the Company's Statement in response to any major business, organisational or legislative changes or as a result of any breach or concern regarding modern slavery.

Signed:

A handwritten signature in black ink, appearing to read 'Mark Felber', is written over a horizontal dashed line.

Mark Felber

Managing Director

Date: 30th June 2020

Issue 4

*Source- www.globalslaveryindex.org