



# Lightfoot

## Modern Slavery Statement 2015

### Introduction

Modern slavery is a crime and a gross 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 in order to exploit them for personal or commercial gain.

Lightfoot has a zero-tolerance approach to modern slavery. We're committed to acting ethically and with integrity in all our business dealing and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

Lightfoot are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Lightfoot expects the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### Responsibility for the Policy

The Lightfoot Board of Directors has overall responsibility for ensuring this policy statement complies with our legal and ethical obligations, and that everyone complies with it.

The Operations Director and Head of Quality have overall day-to-day customer responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure that they are effective.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy statement and are given adequate and regular training on it and the issue of modern slavery in supply chains.

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