

MODERN SLAVERY ACT STATEMENT 2018

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that we, LED Group, have taken and will be taking to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

BACKGROUND

Designing and manufacturing products under the ROBUS brand, the company was established in Dublin in 1984 by Michael Slein. The LED Group is committed to meeting the needs of today’s wholesalers and contractors through the ROBUS range of commercial, residential and retail fittings.

An Irish owned company, the LED Group has a global presence and a reputation worldwide for first class customer service and products

We currently employ over 200 people worldwide. LED Group has ISO9001:2008 Quality Assurance Accreditation and insists upon uncompromising attention to detail and care throughout all processes and practices within the Group. The ROBUS range of products integrates new technologies with an emphasis on high performance LEDs, focusing on energy savings and functionality.

OUR BUSINESS AND SUPPLY CHAIN

LED Group brings a wide range of lighting solutions to your door in Ireland, the UK and throughout Europe, South Africa and Australia. The headquarters, which is situated in Dublin, hosts research, product innovation, design and brand management departments. We have offices in the UK, Europe, Australia, South Africa and Guangzhou City China. Our products are manufactured in Ireland and China. Our supply chain includes approximately 60 suppliers of varying size and expertise, mostly based in Asia.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We remain fully committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our business. Our anti-slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our business or supply chain.

LED Group Board has overall responsibility for our Business Ethics and that it complies with all our legal and ethical obligations.

LED Group Supplier Relationship Management team has primary day to day responsibility for the implementation, monitoring, use and effectiveness of this policy. This policy is subject to review every two years.

STEPS TAKEN AND OUR DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

Our Employees

LED Group employs over 200 employees across Ireland, Europe, China, Australia and South Africa. All employees are given our employee handbook that outlines LED Groups policies including our expectations around Business Ethics.

All our employees are actively encouraged to report their concerns through their line manager, or any member of the Management team.

Our Supply Chain

We have in place systems to identify and assess potential risk areas in our supply chain and to mitigate any identified areas of risk. Our suppliers and contractors are also encouraged to report any concerns that slavery or human trafficking may be, or is, taking place.

Our standard procurement processes include a variety of checks and reviews designed to ensure that the suppliers we engage with have sufficient capability, capacity, and agreement to LED Group policies and commercial terms.

Instances of non-compliance would be considered on a case-by-case basis, taking remedial action as appropriate, potentially including withdrawing from an existing commercial arrangement.

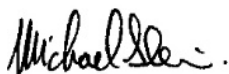
Any new suppliers are required to maintain a Slavery and Human Trafficking Policy, which sets out their internal monitoring, control, due diligence and record keeping procedures undertaken to minimise the risk of an offence under the Act being committed. Standard contractual provisions within our contracts will allow for periodic and targeted audit of compliance with this requirement using a risk-based approach.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We intend to adopt Key Performance Indicators (“KPIs”) to measure our performance and effectiveness in combatting modern slavery and human trafficking over the following 12 months. This will include, ensuring that 100% of our Procurement and Supplier Facing Teams will have completed the targeted Modern Slavery Act training by 31 March 2018.

This statement constitutes LED Groups slavery and human trafficking statement for the Calendar year beginning 1st January 2018.

LED GROUP ROBUS



Michael Slein

Founder and Director

18th January 2018