



SUPPLIER
CODE
of
CONDUCT

FW THORPE PLC

INTRODUCTION

Our objective is to operate as a profitable and responsible lighting manufacturer, whilst seeking to uphold social, ethical and environmental principles to our share holders, customers, employees, suppliers and society as a whole.

To achieve our objective we recognise that the activities conducted through our supply chain, can have an indirect impact on our social, ethical and environmental performance. Therefore, we wish to only work with reputable suppliers and manufacturers that can produce goods for us under "acceptable conditions". This means lawfully, through fair and honest dealing, without exploitation of the people who made them, with decent working conditions and with regard to the environment.

This Code of Conduct sets out to our suppliers, and in turn their suppliers, F.W. Thorpe Plc's basic requirements, which must be met in order to trade with us. A process of self-evaluation and independent inspection is in place to assure its proper and practical application.

OUR COMMITMENT TO SUPPLIERS

We aim to pursue our business activities in what we consider to be an ethical and professional manner. Subject to the needs of our business, we aim to promote stable, sustainable, long-term relationships with our suppliers and other business partners. F.W. Thorpe Plc intends to follow the principles of this Code within its own operations and we have adopted social, ethical and environmental principles and policies to this effect. We recognise that suppliers may need time to address areas in which they may not currently be in compliance but we believe that compliance can be achieved through a process of continuous improvement.

LEGAL COMPLIANCE

We expect all of our suppliers to comply with their national laws and regulations and to respect the fundamental International Labour Organisation (ILO) conventions and the Universal Declaration of Human Rights.

Where the Code or national law addresses the same issue, the supplier is expected, as a minimum, to be in compliance with the applicable legal requirements of the country in which it operates.

HEALTH & SAFETY

We expect our suppliers to provide a safe and healthy environment for their employees in accordance with applicable local laws and regulations. Appropriate procedures should be in place to prevent accidents and injury to health occurring in the course of work or as a result of the operation of employer facilities. Suppliers should have a nominated senior management health and safety representative who monitors the facility's compliance with procedures.

Specifically, suppliers should ensure that:

- All personnel receive regular and recorded health and safety training, and that such training is repeated for new and re-assigned personnel
- Facilities need to have adequate fire safety standards/procedures, including regular fire drills for all employees, appropriate fire fighting equipment, and easily accessible, and marked and open fire exits in case of emergency.
- Facilities have adequate ventilation from harmful fumes or dust.
- Safe alternatives to the use of hazardous substances are adopted.
- Appropriate protective clothing is provided and use of protective clothing is ensured.
- Residential facilities for workers are kept safe and healthy in accordance with local laws and regulations.
- Facilities should have easily accessible, adequate and clean bathrooms.
- Potable water should be available at all times.
- Where HIV/AIDS is a significant issue in the supplier's location of operations, suppliers should educate workers about the risk of HIV/AIDS and assist in providing access to treatment and medication as necessary.

REMUNERATION

F.W. Thorpe Plc expects wages and benefits paid for a standard working week to meet, at a minimum, national legal standards or industry benchmark standards, whichever is the higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

All personnel shall be provided with written and understandable information about their employment conditions and wages before they enter employment.

Personnel shall be paid in a timely manner and in a form and manner that is convenient. The particulars of their wages, for each pay period, should be detailed each time they are paid. Deductions from wages as a disciplinary measure shall not be permitted.

WORKING HOURS

Suppliers are expected to comply with applicable local laws and industry standards on working hours. Suppliers should not, except in special circumstances or as permitted by local law, expect employees to work more than 48 hours per week and shall be provided with, on average, at least one day off every 7-day period.

We recognise that those in management positions may exceed these limits in the course of carrying out their roles and responsibilities. Also, in light of the seasonal nature of business, we recognise that suppliers' employees may be expected in special circumstances to work longer hours for relatively short periods of time. Where this occurs it should be in compliance with the regulations of the country of employment.

Where the Company is party to a collective bargaining agreement freely negotiated with worker organisations (as defined by the ILO) representing a significant portion of its workforce, it may require overtime work in accordance with such agreement to meet short-term business demand. This should be voluntary, should not exceed 12 hours per week, should not be demanded on a regular basis and always be compensated at a premium rate.

FORCED LABOUR

We expect that our suppliers and their supply chains will not permit the use of any forced labour, (including modern slavery and human trafficking), whether in the form of prison labour, indentured labour, bonded labour or otherwise and conform to the annual F.W.Thorpe Plc Slavery and Human Trafficking Statement*

Forced labour should be considered to include any work or service which is extracted from any person under the threat of penalty for its non-performance and for which the worker does not offer himself or herself voluntarily.

CHILD LABOUR

We object to the employment of persons;

- younger than 15 years of age, or higher where required by the law of the country
- younger than the age for completing compulsory education

In addition, employers must comply with all their local legal requirements for young workers, particularly those pertaining to hours of work, wages, health and safety and general working conditions.

A young worker is defined as any worker over the age of a child as defined above and under the age of 18 years old. Child labour is not acceptable.

FREEDOM OF ASSOCIATION

We expect that our suppliers will not prevent employees and other workers from associating freely with any lawful workers' association or collective bargaining association.

Where laws prohibit these freedoms, the supplier is encouraged to facilitate parallel means of association and bargaining.

HARASSMENT AND ABUSE

We expect that our suppliers will provide a safe workplace free from harassment, and they will not permit the use of monetary fines, corporal punishment or other forms of mental or physical abuse, coercion or intimidation.

All disciplinary measures should be recorded.

ETHICS AND INTEGRITY

We expect that our suppliers will conduct business with integrity and communicate honestly regarding the nature of the products they supply.

Suppliers must respect the privacy and confidential information of their employees and business partners as well as protect data and intellectual property from misuse. The confidentiality of information exchanged in the course of business must be respected and never be used for illegal purposes or for individual gain. False information must not be given in the course of commercial negotiations.

BRIBERY AND CORRUPTION

The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments will not be tolerated. Suppliers and representatives will be expected to have anti-corruption and bribery procedures in place.

DISCRIMINATION

We expect that our suppliers will not discriminate on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age.

Employees and other stakeholders should be able to report concerns or potentially unlawful practices at the workplace without fear of reprisal.

* Available to view at:

www.fwthorpe.co.uk/pdf/fwthorpe-slavery-and-human-trafficking-statement.pdf

FW THORPE PLC

ENVIRONMENTAL

We encourage suppliers to have an Environmental Policy that is communicated to all employees and states the overall environmental objectives, a commitment to comply with local laws and a commitment to continuous improvement.

Material safety data sheets (MSDS) should be available and hazardous waste/chemical storage containers should be in good condition, labelled and stored appropriately.

Materials used in the manufacturing process or end product should minimise, and where possible, eliminate releases to the environment in amounts that cause harm to human health or the environment.

Where practical, materials from sustainable and well-managed sources should be used. Suppliers should encourage recycling and take steps to minimise, and carefully dispose of, waste. We encourage the reduction of energy within our suppliers processes.

QUALITY

We expect goods to be supplied without fault and of the best available design, quality, materials and workmanship. They should conform in all respects with any order and specification and/or patterns or samples supplied and be fit for purpose.

Any services will be provided by appropriately qualified and trained personnel, with due care and diligence, to a high standard of quality and conform in all respects to any order.

COMMUNICATION

Suppliers are encouraged to take appropriate steps to ensure the provisions of this Code are communicated to their employees and their own supply chain.

Suppliers are also encouraged to ensure that the principles referred to above are adopted and applied by their employees, suppliers, agents and contractors so far as reasonably possible.

MONITORING

Suppliers are encouraged to institute a self-monitoring system based on this Code and move towards independent verification of Code compliance.

SANCTIONS

Compliance with the requirements of the code will be monitored and the results notified to the relevant suppliers. In the event of failure to achieve the standards, a supplier may be given the opportunity to achieve them within a reasonable time to be agreed with F.W. Thorpe Plc.

Whilst F.W. Thorpe Plc will strive to ensure that all corrective actions are resolved through a successful partnership with suppliers and factories, if at the end of the agreed time, standards are not achieved, depending on the severity of the failure, F.W. Thorpe Plc may stop trading with the supplier concerned.

I have read the above and confirm that this Company practices its business in compliance with the above code of conduct.

Director's Name: _____

Director's Signature: _____

Position: _____

Date: _____

Company: _____

(Please attach your 'factory rules' for workers if available)

HUMAN RIGHTS IN XINJIANG

In the past, as a supplier of FW Thorpe Plc, you have confirmed compliance with our supplier code of conduct.

The UK Government continues to be committed to tackle labour exploitation wherever it specifically occurs. Currently it has serious concerns about the gross violations of human rights being perpetrated against Uyghur, and other ethnic minorities, within the Xinjiang region of China.

Consequently, the UK Government has reinforced the need for businesses to take action to address this risk and ensure they are not complicit in, nor profiting from, the human rights violations in Xinjiang.

To help achieve this objective they have encouraged UK businesses to do all they can to prevent the export of goods, that may contribute to human rights abuses, from this region.

Can you therefore confirm, by signing the section below, that your company, or your suppliers, do not have any manufacturing operations within the Xinjiang region of China and do not obtain any goods or services from this region.

I have read the above and confirm that this Company complies with the statement above.

Director's Name: _____

Director's Signature: _____

Position: _____

Date: _____

Company: _____