

## Modern Slavery Statement and Policy

### 1. Introduction

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It details the steps and commitment taken by the Lowe & Fletcher Group to understand all potential modern slavery risks related to our business and its supply chain. As an international manufacturer Lowe & Fletcher is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

### 2. The Lowe & Fletcher Group

The Lowe & Fletcher Group is a fifth-generation, privately owned family business which was founded in 1889. The business is split into two operating divisions which are overseen by a Group Head Office:



The Locking Systems Division operates under the Lowe & Fletcher and Euro-Locks brands and is active in the design, manufacture and supply of locking systems for industry. It has a business in both the United Kingdom and the USA operating under the Lowe & Fletcher brand. Within Belgium, France, Germany and Poland the business operates under the Euro-Locks brand.

The Safety and Security Systems Division is active in the design, manufacture, supply, installation and maintenance of smoke and fire curtains. It has two businesses, BLE and Coopers Fire, which are based in the United Kingdom.

The Group employs approximately 1,000 people.

The Group Strategy Statement and Values are:

A long-term Family Business designing and making innovative, bespoke and well-engineered Locking Systems for Industry and Smoke and Fire Curtains for buildings. We aim for profitable growth by meeting the needs of our customers worldwide.

Our values are embedded in our family business ethos. They enable us to develop as a team, invent new things, and plan for the future with conviction and confidence. They can be summed up as follows:

- We act with honesty, openness and a respect for others;
- We act with care and consistency;
- We take responsibility for our actions.

### 3. Operations and Supply Chain

Our factories design, manufacture and distribute products across domestic and international markets to a diverse range of customers. Operations include both manufacturing and assembly processes requiring the use of bought in raw materials, components and services. Our supply chain extends across the World. Whilst confident that it is compliant with modern slavery and human trafficking laws, we recognise that in some countries the risk is increased and we undertake procedures to ensure that all suppliers are compliant with legislation.

### 4. Compliance and Risk

The Lowe & Fletcher Group uses risk management procedures and proactive measures to ensure that its operations are not exposed to the risk of modern slavery and human trafficking occurring within its supply chain. These procedures are supported by corporate policies and ensuring that the business complies with all applicable laws and regulations.

We are committed to engaging with all stakeholders, including suppliers, to address the risk of modern slavery and human trafficking in our operations and supply chain.

The Lowe & Fletcher Group maintains a zero-tolerance approach to modern slavery. Due diligence is ongoing and we ensure the following is undertaken:

- Suppliers are assessed on their quality, price and risk in their ability to supply us. This includes close co-operation with all external suppliers to ensure their ethics and values are reflective of those of the Lowe & Fletcher Group. New and existing suppliers are assessed to ensure their standards meet ours.
- All potential employees of the Lowe & Fletcher Group are assessed regarding their right to work.
- All employees are aware of and are expected to work within our own and national equality policies to promote and encourage an environment of cultural inclusion and diversity.
- The Lowe & Fletcher Group actively enforces a culture of ethical trading covering the aspects of anti-corruption, anti-bribery, fraud, gifts and hospitality.
- Salary and wages are compliant with relevant local government legislation.
- The Lowe & Fletcher Group continue to inform employees and assess suppliers of the risks surrounding modern slavery and human trafficking.

### 5. Further Action

The Lowe & Fletcher Group will continue to challenge all processes and policies to maintain the highest ethical standards of business in line with its values. This statement constitutes the Group's modern slavery statement for the current financial year.



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31 December 2021