Subsidiary Companies

Lea Forestry Limited
Albright International Limited
Albright Japan Limited
Albright France Limited
Albright Lithuania (UAB Albright Lietuva)
Albright China (Electro-Mechanical Shanghai) Ltd
Albright Deutschland

Directors : N.E.L. Bedggood, L.E.V Bedggood, M Adaway
C A Catt & M A Bedggood

Lea Redway Limited
Braggers Farm
Braggers Lane
Bransgore, Christchurch
Dorset, BH23 8EF
UK

Tel : 07719007923
Fax : 08702428445

# *Anti-Slavery Policy*

## *Introduction*

Lea Redway Limited parent company of Albright International Ltd a privately owned company specialising in design and manufacture of electrical equipment, ie. heavy duty DC power contactors, solenoid switches, relays, switch gear and associated control panels. The tradename of *Albright* is common to operations located in England, China, Lithuania, India, Germany, France and Japan.

Lea Redway & Albright value human rights and are committed to ensuring that all business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business.

## *Aims of this policy*

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, and any other third-party representative.

We expect all who have, or seek to have, a business relationship with the company to familiarize themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organizations who fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA), as well as in accordance with Social Accountability SA8000.

What do we mean by modern slavery?

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Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

***Slavery:*** where ownership is exercised over an individual

***Servitude:*** involves the obligation to provide service imposed by coercion

***Forced and compulsory labour:*** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.

***Human trafficking:*** involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

***Child labour:*** whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

## *Responsibility for this policy*

The Directors have overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The HR Manager, Global Purchasing Manager and Global Quality and Standards Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All Managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

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## *Communication and employee awareness training*

The HR Manager, Global Purchasing Manager and Global Quality and Standards Manager will undergo awareness training via SA8000 and in turn will then be responsible to ensure all the staff beneath them are fully aware of what is required to ensure that best practice is followed.

In addition staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and to identify individuals/areas of the business that may be at risk from practices of modern slavery.

## *Reporting*

Internal reporting is critical to the Company's success and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of the Policy or any illegal or unethical behaviour that you become aware of. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith".

If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must notify their HR Department as soon as possible. If the staff member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with their HR Department.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff member believes that they have suffered any such treatment, they should inform the Company's whistle blowing contacts.

## *Breaches of this policy*

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious

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breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure and if warranted legal proceedings may be brought against you.

The Company may terminate its relationship with other individuals and organisations working on its behalf or engaged by it if they breach this Policy.

Everybody to who whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the HR Manager.

## *Status of this policy*

This Anti-slavery policy will be reviewed by the Company's board of directors on a regular basis at least annually.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

Authorised by

M Adaway
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Mrs Maria Adaway – Director
4-3-2025