MODERN SLAVERY STATEMENT

It continues to be a priority for Dextra Group Plc to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

We are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

Organisation's structure

Dextra Group Plc is the holding company of the following subsidiary companies:

- Dextra Services Limited
- Dextra Lighting Limited
- Dexeco Limited
- Dexreco Limited
- Dexsor Limited
- Dexretail Limited
- Ledextra Limited
- Ledex Limited

The head office is based in Gillingham, Dorset, with various external sales personnel based around the UK and Ireland. The various companies within the Group each have their own board of directors.

Our business

The main activity of the group is the manufacture, sale, and distribution of luminaires around the UK and overseas. The group also recycles end of life products under its WEE regulation obligations. Demand for our product is throughout the year and is, therefore, not seasonal.

The labour supplied to the organisation in pursuance of its operation is mainly UK based, however, some surveys and rectification work may be carried out overseas.

Our supply chains

In order to carry out our business activities, our main supply chains include those related to its various suppliers around the world.

Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our policies reflect our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have an Anti-Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then take appropriate action with regard to the organisation's obligations.

We have the following policies and procedures in place relevant to modern slavery, which we regularly review and update:

- Anti-Bribery and Corruption
- Dignity at Work
- Labour standards and industrial relations
- Code of Ethics
- Whistleblowing
- Responsible Procurement Policy
- Supplier Code of Conduct
- Supplier Due Diligence Questionnaire

Due diligence processes for slavery and human trafficking

Some of our components are only available from the Far East and we consider that this area gives rise to the highest modern slavery risks.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle-blowers.

Supplier adherence to our values

To ensure all those in our supply chain, including contractors, comply with our values, we review the results of our supplier Due Diligence Questionnaires annually. In addition, it is compulsory for all our suppliers to sign their agreement to our Supplier Code of Conduct.

We work with our carefully selected external advisors and our internal teams, to ensure we monitor the success of our processes in the following areas:

- Legal
- Human Resources
- Recruitment
- Sales
- Procurement
- Audit and compliance

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we provide compulsory training for all employees.

Our regular i-HASCO training includes modules specifically covering Anti-Bribery and Modern Slavery, and these modules are completed both at the induction stage and on an ongoing basis where appropriate.

Our effectiveness in combating slavery and human trafficking

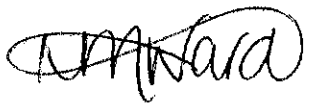
We regularly review the effectiveness of our training programmes and our policies and procedures. Where areas for improvement are identified, we will adapt and develop our processes accordingly.

Next Steps

In particular, we regularly review the following processes to ensure they align with best practice:

- Vetting procedures
- Supplier screening
- Subcontractor inspections – including Risk Assessment documentation
- Whistleblowing – we have a system in place which provides for the appropriate escalation of any issues to the Board without delay, and policies in place to provide protection for whistle-blowers
- Training – we continue to ensure compulsory training is completed by all relevant employees, and will consider widening the range of training provided should our reviews indicate this would be beneficial. We have processes in place to alert management to any training non-attendance and ensure this is dealt with promptly where necessary.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2025. It was approved by the board on 22nd January 2025.



Signed

Dextra Group plc

22nd January 2025

Allocation of responsibility: Chief Operating Officer
Policy no. HR.P034 Issue date:22/01/2025 v8