Abacus®
Leaders in Lighting

Modern Slavery	Section
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	Issue: 04
Policy Statement	Effective from: 04/01/2022
	Prepared by: Roger Dixon
	Approved by: Steve Lamb

This statement has been published in accordance with the Modern Slavery Act 2015 (the Act). It sets out the steps taken by Abacus Lighting Ltd. to prevent modern slavery and human trafficking in its business and supply chains. This statement has been approved by the Board of Directors of Abacus Lighting Ltd. and signed by Steve Lamb, Chairman.

Our business

Abacus Lighting Ltd. designs, manufactures, installs, services and maintains exterior lighting, street bollards and associated equipment including lighting columns, high masts and brackets (up to 60 metres in height to NHSS Scheme 6.) Design of lighting schemes, provision of associated training in the use of its products and provision of subcontract services for specialist profiling, forming and welding. Its products are supplied globally.

Our Standards

Our Company Standards prohibit human rights abuses and promote the United Nations Universal Declaration of Human Rights and the International Labour Organisation's standards regarding child labour and minimum age.

Our people and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour they encounter and to speak up if they see things that do not meet our high standards. We have an independent and confidential whistleblowing policy where issues can be raised. All reports are treated seriously and all concerns that are raised in good faith are investigated without bias and with absolute discretion. Appropriate action is taken where behaviour has fallen below that which we require.

Our people

Whilst there is less risk in our own business than through our supply chain, we have also undertaken some action to prevent modern slavery and human trafficking in our own business.

Our UK recruitment policy explicitly commits us to the prevention of modern slavery in our business and guidance is provided to relevant managers in our recruitment process.

Abacus Lighting Ltd. managers carry out checks on original right to work documents when they interview prospective employees and The Recruitment Group, our managed service provider of temporary workers, carry out the same process when they meet with prospective temporary workers on our behalf.

When new employees join Abacus Lighting Ltd., our pre-employment checks ensure that bank account details provided for the payment of salary match the name of the employee and, where discrepancies are identified, we investigate and may require further assurance to ensure the employee is not subject to modern slavery. Where documents which link the employee with the payee cannot be provided, this is escalated to the HR Manager for assessment.

Our supply chain

Our supply chain consists of both suppliers and subcontractors; we do not source from high-risk countries of origin (such countries being determined as high risk by the Global Slavery Index).

Abacus Lighting Ltd. subcontractors and suppliers may be required to confirm the actions they are taking to ensure labour exploitation, modern slavery and human trafficking are not taking place in any part of their business or supply chain.

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We also require all those who work for or with us, all factories and premises used in the manufacture and supply of products and services to conform to our standards. In doing this, suppliers are required to comply with all applicable laws, statutes, regulations and codes from time to time in force including but not limited to the Act, United Nations Global Compact and the International Labour Organization International Labour Standards.

Appropriate action is taken to investigate and address failure to meet our standards and failures to meet our standards may result in removal from our approved supplier list.

We may obtain information on the measures that high-risk suppliers/subcontractors are taking to ensure modern slavery and human trafficking is not taking place. Where we have determined that this is not sufficient, we would work with suppliers/subcontractors to improve their approach to modern slavery.

We have updated our pre-qualification questionnaires (part of our process for accepting suppliers and subcontractors onto our approved supplier list) to include specific questions on modern slavery and human trafficking to understand the approach taken. The responses are reviewed by our procurement team.

We expect our suppliers and subcontractors to comply with the Act and ensure that their suppliers and subcontractors will too.

Our journey

We understand that the risk of modern slavery is not static, and we must continue to improve our mitigation in the years ahead, with a particular focus on:

- staff awareness.
- high risk countries of origin
- developing an agreed approach to modern slavery with our supply chain.

We are committed to preventing modern slavery within our business and supply chain through the policies and procedures we have implemented.

S. A. Lamb

Steve Lamb
Chairman
04/01/2022