

STATEMENT OF COMPANY SUSTAINABLE AND ETHICAL PROCUREMENT POLICY

Introduction

It is the policy of Levolux Ltd (hereinafter written as Levolux) to take social and environmental factors into consideration, alongside financial factors, in making decisions on the purchase of goods and the commissioning of services.

Our purchasing decisions should where practicable, consider whole life cost and associated risks and implications for society and the environment.

Procurement has an additional role to play in minimising any risk of social exploitation within the supply chain. We believe that this not only makes business sense, it also has the potential to improve the living and working standards of people around the world.

This policy clarifies the expectation that our staff and suppliers must respect our ethical standards and relationships with suppliers are based on the principle of fair and honest trading at all times.

The same principle of fair and honest trading must be extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties.

Our Policy

Levolux ethical supply chain policy requires that the ethical issues and social responsibility within supply chains are understood and addressed when managing business to business supplier relationships and through the purchasing of goods and services from our suppliers.

Upholding the principles of this policy is a shared responsibility between Levolux and its suppliers; the policy will be adopted at senior and director level within the company.

Levolux expects its suppliers to assign and accept similar responsibility.

Sustainable Procurement

Our sustainability objective is to ensure continuous improvement in procurement decisions are made against delivering sustainable and ethical trading. We seek to avoid adverse social and environmental impact in the supply chain, and the reduction of environmental impact from service operations and the purchase of products that meet recognised environmental standards.

Ethical Procurement

Our ethical objective is to ensure that people in the supply chain are treated with respect, and have the rights with regard to employment; including the rights to freely choose employment, freedom of association, payment of a living wage, working hours that comply with national laws, equal opportunities, recognised employment relationship, freedom from intimidation and a safe and healthy working environment.

Levolux requires suppliers to comply with their National Laws in respect to;

- Health and Safety at Work
- Employment law including; minimum working age, discrimination in respect of race, gender, religion, disability, harassment and bullying, etc.

Procurement Process

We will use our purchasing power, where practicable, to influence and encourage suppliers in order to create a more reliable market for environmentally and ethically produced products and services.

Environmental and social factors shall be considered in the purchasing process. Specifically this includes considering what the product is made from, the product durability, where it was made and by whom, the efficiency of the product during use and the processes involved in its production and distribution and if it can be reused or recycled.

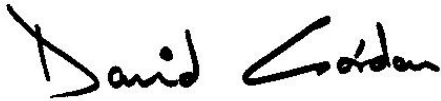
Responsibility and Authority

The policy is issued under the authority of the Divisional Managing Director.

Responsibility for adherence to this policy rests with the Operations Director and Supply Chain Manager.

The HR Director is responsible for periodically reviewing the adequacy of the policy.

For and on behalf of Levolux Limited

A handwritten signature in black ink that reads "David Gordon". The signature is written in a cursive style with a large initial 'D'.

David Gordon – Acting Divisional Managing Director

Date: 9th October 2017