

**Armadillo Marketing limited t/a Armadillo Lighting
Slavery and Human Trafficking Statement**

ORGANISATIONAL STRUCTURE

1. The organizational structure of the Armadillo Marketing limited t/a Armadillo Lighting, (referred to as “Armadillo Lighting”)
2. Armadillo Lighting is controlled by a Board of Directors. Armadillo Lighting’s Head Office is located in Great Dunmow.
3. Armadillo Lighting is predominately involved in the design, manufacturing supply and install of Lighting products systems, controls and maintenance service. Services are mainly offered in UK, however project may involve overseas locations like, USA, Brazil, Canada, New Zealand, Mainland Europe etc.

DEFINITIONS

Armadillo Lighting considers that modern slavery encompasses:

1. Human trafficking;
2. Forced work, through mental or physical threat;
3. Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
4. Being dehumanized, treated as a commodity or being bought or sold as property;
5. Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

1. Armadillo Lighting acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains. Armadillo Lighting understands that this requires an ongoing review of both its internal practices in relation to its labor force and its supply chains.
2. Armadillo Lighting has a zero-tolerance policy towards modern slavery. It will refrain from entering into business, and/or will discontinue any current business with any other organization which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labor.
3. The labor supplied to Armadillo Lighting in pursuance of the services it provides is carried out wholly in the countries where those services are provided.
4. No labor provided to Armadillo Lighting in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Armadillo Lighting strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK or other countries as appropriate, and in many cases exceeds those minimums in relation to its employees.
5. Armadillo Lighting offers employment contracts on a guaranteed hours basis only; no offers of employment are made on a zero hours basis.
6. Part-time and fixed-term employees within Armadillo Lighting are provided with the same pro-rata contractual entitlements as full-time and permanent employees. If these are not offered, Armadillo Lighting is able to rely on objectively justifiable grounds.



POTENTIAL EXPOSURE

1. Armadillo Lighting considers its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organization that supplies goods and/or services to it.
2. In the operation of its business, Armadillo Lighting's main supply chains are those related to the provision of services. Armadillo Lighting considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains.

STEPS

1. Armadillo Lighting carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its supply chains.
2. Armadillo Lighting has not, to its knowledge, conducted any business with another organization which has been found to have involved itself with slavery and/or human trafficking.
3. In accordance with Modern Slavery Act 2015, Armadillo Lighting has contacted (or attempted to contact) all first tier suppliers to set out our zero-tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.
4. Armadillo Lighting has taken action to monitor reports of modern slavery and will cross reference such reports with our first-tier supply chain. Armadillo Lighting will seek to discontinue business with any first-tier supplier found by the enforcement authorities to be involved in modern slavery.
5. Armadillo Lighting encourages use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

TRAINING

1. Upon commencement of employment, all employees undergo a structured class room environment induction process. All employees are made aware of Armadillo Lighting policies relating to standards of behavior that it requires from them. In its statement for the previous financial year, Armadillo Lighting set itself a target of ensuring that 100% of new starters would complete the induction within two weeks of commencement of employment, of which 99% did complete within this target.
2. Armadillo Lighting also provides training on awareness of modern slavery to those within Armadillo Lighting who have been identified as having responsibilities in this regard, namely those involved in finance and procurement. Armadillo Lighting ensures that annual update training is provided.



ASSESSMENT OF EFFECTIVENESS IN COMBATting MODERN SLAVERY

1. To ensure effectiveness in combatting modern slavery, Armadillo Lighting maintains an accurate supplier list including contact details. It will ensure action is taken in response to reports of modern slavery in its supply chains and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.
2. Following a review undertaken for Armadillo Lighting's statement of the previous financial year, Armadillo Lighting confirms its supplier list is up to date for the current financial year.
3. As in the previous financial year, there have been no reports that any of Armadillo Lighting's suppliers have been involved in activities covered by the Modern Slavery Act.

POLICIES

Armadillo Lighting also has a Corporate Social Responsibility Policy which further defines its stance on modern slavery. In addition, a Whistleblowing policy is in place which encourages the reporting of any wrongdoing which is in the public interest.

GROUP DATA PROTECTION & COMPLIANCE OFFICER

Armadillo Lighting has a Data Protection & Compliance Officer, to whom all concerns regarding modern slavery should be addressed. Armadillo Lighting Data Protection & Compliance Officer undertakes an annual review of Armadillo Lighting's obligations towards eradicating modern slavery within its organisation and supply chains.

REVIEW

This statement is made in pursuance of the Modern Slavery Act 2010 and applies to all companies within and associated to Armadillo Lighting. It is reviewed for each financial year.

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