

Modern Slavery and Human Trafficking Statement

Introduction

This voluntary Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

The statement sets down the Lightfoot Defence Ltd commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Lightfoot Defence Ltd which are as follows:

Delivery of design, manufacture, installation, repair and servicing of refrigeration and air-conditioning equipment to our Military and Commercial partners. We operate through four sectors: Marine, Nuclear, Land and Aviation. As an international business, we recognise our responsibility for upholding and protecting the human rights of our employees and other individuals with whom we deal throughout our supply chain and in our operations across the world.

Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas preferred suppliers, mainly through UK government frameworks. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Responsibility for the Company's anti-slavery initiatives is as follows:

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

The key areas of our policies are:

Our People

- Inclusion and diversity
- Dignity and respect

- Human Rights
- Modern Slavery

Our Business

- Anti-bribery and corruption
- Gifts and hospitality
- Conflicts of interest
- Anti-trust and competition

Our World

- Health and safety
- Environment
- Community engagement

Our Assets

- Intellectual property
- Confidential information
- Cyber security

Compliance

- Our due diligence
- Whistleblowing

Embedding the principles

We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK
- ensuring that consideration of the modern slavery risks and prevention are added to Lightfoot Defence Ltd policy review process as an employer and procurer of goods and services
- making sure Lightfoot Defence procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero-tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

Training

- To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes:

- building long-standing relationships with suppliers and making clear our expectations of business partners
- evaluating the modern slavery and human trafficking risks of each new supplier
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors / Management Team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Terry Nicholls

Position: Managing Director

Date: 02/01/2024

Signature:



DOCUMENT AMENDMENT RECORD

Revision History					
Rev	Date	Reason for Change	Author	Checked	Approved
0.01	22/12/23	Draft	C. Beresford	S. Rodgers	T. Nicholls
1	02/01/24	Review & Release	C. Beresford	D. Gladding	T. Nicholls
1.01	24/07/24	Date Updated	C. Beresford	D. Gladding	T. Nicholls
2	24/07/24	Release	C. Beresford	D. Gladding	T. Nicholls

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