

Lucy Group CSR Policy

We are a global manufacturing and property business operating through four diverse business units. Lucy Group Limited is the parent company of several companies based in the UK and abroad (the "Lucy Group"). Lucy Group's Corporate and Social Responsibility policy sets out our efforts to give back to the world as it gives to us.

Scope

This policy applies to the entirety of the Lucy Group. It may also refer to Suppliers, Partners and Customers.

The principles we follow and the programmes we have developed focus on the areas where we have significant impact and influence. We want to be a responsible business that meets the highest standards of ethics and professionalism. We are an organisation built on our proud heritage and driven by strong principles

Our Core Values are the backbone of who we are as an organisation and they are central to delivering our business strategy and forming our Corporate and Social responsibilities. We have a reputation for high standards of business conduct which are imbued by our values and behaviours.

These values are:

Caring: We treat all with fairness and respect. We value diversity. We recognise and develop our people.

Trusted: We build and maintain trusted relationships with all people and partners

Working Together: Team working and communication are at the forefront of everything we do. We share our knowledge across our organisation for the benefit of all.

Excellence: Through ingenuity and a dedication to quality, we create smart, sustainable solutions.

Daring to Differentiate: We are market leaders. We make bold decisions. We stand out.

Our Organisation's social responsibility falls under two categories: **Compliance** and **Social Good**. Compliance refers to our company's commitment to governance, legality and our willingness to observe community values. Social Good is every initiative to promote human rights, help communities and protect our natural environment.

We believe in respecting the interests of all our stakeholders and the wider community and look actively for opportunities to improve our environment whilst contributing to the wellbeing of the communities in which we operate.

COMPLIANCE

Governance

Lucy Group is committed to strong Governance of Corporate and Social Responsibility throughout our organisation. This is enshrined in all of our policies and procedures driven by our strategy formulation and development.

Labour Practices

Lucy Group ensures excellent labour practices throughout our organisation and our supply chain. We comply with all workplace legislation both in the UK and in our factories abroad. We provide excellent conditions of work, social protection and ensure that our colleagues have access to development and Training. All of this is underpinned by our Global Health, Safety and Environmental strategy, training

delivery, risk assessment and personal monitoring overseen by our team of specialists.

Fair Operating Practices

Lucy Group operates fairly and equitably throughout our business complying with all laws pertaining to good operating practices both in the UK and abroad. We train our staff in fair competition practices and anti-corruption and in accordance with our internal Anti-Bribery and Corruption policy. We incorporate Social responsibility standards throughout our value chain and respect intellectual property rights. Lucy Group takes note of the world economic forum 'Partnering against corruption initiative' (PACI)

Consumer Issues

All of Lucy Group's marketing material is factual, fair and written in comprehensible and appropriate language for its target audience. We engage in fair contractual practice and protect our consumer's health and safety with excellent quality products designed by our highly skilled engineering team. Additionally we have our Lucy Group Skills Academy which educates and raises awareness of our products and advises on how to manage any potential risks. We aim for the sustainable consumption of our products from inception to decommissioning and responsible maintenance throughout its life cycle.

It is important to us that we provide excellent customer service from enquiry to delivery of our products and services. We have a dedicated team who deal with dispute resolution and complaints in the unlikely event of problems arising. We protect our customer's privacy and adhere to all laws on data protection, extending this through our operations globally.

Health and Safety

Lucy Group is committed to providing a healthy and safe work environment for all our stakeholders. Our most important asset is our people and their health and safety is a responsibility that we take very seriously. Health and Safety is a key part of the way we operate, this extends to ensuring that our business does not place any risk to local communities in which we work. We train all staff to be vigilant, responsible and accountable for a safe working environment free from injury or accidents. = We do this by promoting a system of continuous improvement identifying, assessing and controlling the risks associated with our operations; setting objectives and targets aimed at elimination of work related injury. We also provide instruction and training both in the understanding of work place hazards and safe working practices but also for emergency preparedness.

Lucy Group actively promotes and encourages employees to report incidents and accidents. These are analysed and investigated through a system of corrective and preventative actions. We provide and support health promotion and monitoring including safety while working overseas. As a company we are committed at all times to comply with all applicable laws and regulations in all the countries in which we operate. We also adhere to associated codes of practice and standards related to excellent health and safety monitoring.

SOCIAL GOOD

Our corporate and social responsibility covers, Governance, Health and Safety, Employment, Environment, society, business integrity, the promotion and protection of human rights in our supply chain and providing the responsible provision of products and services.

We communicate and promote our culture and values: ***'Caring, Excellence, Working Together, Trusted, Daring to Differentiate'***, all of which is underpinned by our Corporate and Social Responsibility philosophy. We consider the long term implications of our impact on our environment and our communities in the decisions we make as a global business.

The Environment

Lucy Group is committed to caring for the environment wherever we operate. We manage this through our comprehensive Environmental policies which are audited annually by third party experts.

We strive to go beyond legislative requirements by critically examining all of our activities and embracing a culture of continuous improvement. to deliver holistic 'Green Management'

Community and Development

Lucy Group values its employees and the communities in which it operates. Social investment and community involvement is a key part of our Corporate and Social responsibility initiatives. We are involved in our local communities and encourage our staff to engage in the charitable and philanthropic activities of their choosing, as well as having charities which the company specifically support. We champion the strengthening of educational and Health services locally where needed and contribute financially to these kinds of activities. We endeavour to participate in the wealth and income creation of local communities through employment opportunity and skill development for apprentices and graduates. We respect the cultures in which we work and endeavour to ensure that our operations do not harm the local environment or undermine local customs, culture or beliefs.

Human Rights

Lucy Group is committed to maintaining a culture which supports internationally recognised Human Rights Declarations. We recognise our responsibility to respect human rights and avoid complicity in human rights abuses. We operate in diverse and often challenging social, economic, political and cultural landscapes. Therefore it's imperative and core to our business to respect human rights by building enduring relationships with local communities, employees and business partners. Acting responsibly is central to our strategy in both the developed and emerging economies. We have developed our global Principles of Business to reflect our commitment to acting ethically and with integrity in all our business relationships or anywhere within our supply chains. We have a zero tolerance policy regarding the discrimination of vulnerable groups and those within our sphere of influence.

We subscribe to the following ILO fundamental principles and rights to work:

1. Freedom of association and effective recognition of collective bargaining.
2. Elimination of all forms of forced labour.
3. Effective abolition of child labour.
4. Elimination of discrimination regarding employment and occupation.

Human Rights Statement

Lucy Group is committed to further developing a culture which supports internationally recognised human rights declarations. We recognise our responsibility to respect human rights and avoid human rights abuses.

Our aim is to improve our human rights performance by referencing the principles of the Universal declaration of human rights, the core convention of the ILO labour standards and the 10 UN Principles of Human Rights. Additionally we support, and operate within the principles of other related conventions and international laws and standards.

Lucy Group continues to support and develop efforts to support Human Rights, as well as taking part in various activities designed to promote Corporate Responsibility.

A handwritten signature in black ink, appearing to read "J. Finch-Dick".

**JONATHAN FINCH-DICK
EXECUTIVE DIRECTOR
LUCY GROUP LTD**