

LUCY GROUP SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR 2024

INTRODUCTION

Lucy Group Limited is a relevant commercial organisation within section 54 of the Modern Slavery Act 2015. This transparency in supply chain statement is made by Lucy Group Ltd as parent company on behalf of all group companies including Lucy Electric UK Limited which is itself a relevant commercial organisation within section 54 of the Modern Slavery Act 2015. Both Lucy Group Ltd and Lucy Electric UK Ltd volunteer to file their current modern slavery statements with the Modern Slavery Statement Registry held by the Home Office Department within the UK Government.

THE GROUP'S STRUCTURE

We are a global manufacturing and property business operating through three diverse business units as explained below. Lucy Group Limited is the parent company of several companies based in the UK and abroad (together the "Group"). At the end of 2024 the Group had over 1,839 employees worldwide operating in the UK, Romania, India, the Middle East, Africa, Asia, Australia and South America.

THE GROUP'S BUSINESSES

The Group's business is organised into three diverse business units: Lucy Electric, Lucy Controls and Lucy Real Estate, supported by head office in Oxford. Lucy Electric and Lucy Controls both operate domestically and internationally with Lucy Real Estate operating only in the UK.

Lucy Electric is an international leader in intelligent secondary power distribution products and solutions, with features such as remote operation and monitoring. Linking energy generation to consumption, the business specialises in high-performance medium and low-voltage switchgear for utility, industrial and commercial application.

Lucy Controls has three distinct businesses. Lucy Zodion is an industry leader in advanced street lighting controls, power distribution and electric vehicle (EV) supply solutions selling mainly in the UK. Its products assist customers with energising urban and highways infrastructure from the ground up with products ranging from photocells, power distribution enclosures, EV connection feeder pillars, isolators, cut outs and switchgear. Lawson Fuses specialises in the design, development and manufacture in the UK and India of low-voltage, high-rupturing capacity (HRC) fuse links and fuse holders, selling globally directly and via distributors. Its applications are suitable for electric and electronic capital equipment, utilities, renewable energy and domestic households. Flashnet, Romania offers a portfolio of smart, connected street lighting and grid management systems. The business integrates the latest IT, Internet of Things (IoT), energy and telecommunications technologies into hardware and software solutions to create and implement intelligent infrastructure and city control systems in Europe, USA and the Middle East.

Lucy Real Estate is one of Oxford's largest private landlords with a lettings and management business that invests in and manages over 500 commercial and residential properties for over 750 tenants, with in-house service and maintenance and an increasing focus on sustainable living. Lucy Real Estate also develops attractive, sustainable homes, with prime sites within a 90-minute commute of Oxford. Its bespoke properties have EPC A or B-ratings and embrace innovative design, ecological materials and renewable energy.

THE GROUP'S SUPPLY CHAINS

Lucy Electric's supply chain is partly internal as various group companies supply goods and services to each other. Lucy Electric also has a significant domestic and international supply chain with most suppliers located near its manufacturing locations in the UK, Saudi Arabia, UAE, India, Thailand and Brazil. Within Lucy Controls, Flashnet's supply chain is predominantly based in the EU. Lucy Zodion's supply chain is mainly domestic situated near its factory in Sowerby Bridge with suppliers in Asia Pacific and Europe as well as internal group suppliers. Lawson Fuses is based in Newcastle and India with its main suppliers based in both countries. Lucy Real Estate's supply chain is all UK-based with the

majority based in Oxfordshire. Lucy Real Estate operates as the main contractor for the majority of its developments procuring directly from its suppliers and for the remaining developments Lucy Real Estate procures indirectly by engaging another main contractor to carry out the development and engage suppliers.

TRAINING AND AUDITS

As Lucy Real Estate operates in the high-risk construction industry it provided intensive training during 2024 to all its site managers to enable them to spot the signs of modern slavery. Lucy Real Estate also conducted, and continues to conduct, audits of its construction sites to reduce the risks of slavery and human trafficking occurring within such sites.

Following the launch of our new Group Purchasing Policy we rolled out training to all staff globally with an excellent completion rate. We have also recently repeated our Modern Slavery compliance training with a very good completion rate so far although the roll-out of this module is still on-going. Both of these training modules should support the improvement of our procurement processes and increase general awareness to help reduce the risks of slavery and human trafficking occurring within our businesses and that of our supply chains.

As part of its procurement and risk management strategy, Lucy Electric has implemented a supplier quality manual that defines its sustainability objectives and incorporates a structured supplier questionnaire to ensure compliance with the Group's Purchasing Policy, while also addressing modern slavery risks. As a part of the next steps Lucy Electric is working to identify high-risk areas in its supply chain by determining where modern slavery risks are highest (by geography, industry and type of supplier) to categorise suppliers by risk level. The onboarding processes for new suppliers include vetting them for modern slavery risks. Regular training is provided to procurement teams and other relevant staff to educate them on modern slavery risks, red flags, and how to report concerns.

Supplier audits are another key component of Lucy Electric's risk mitigation approach. Audits are conducted annually on key suppliers. In cases of elevated risk, critical issues, or ongoing development projects, suppliers may be audited or visited more frequently. These audits, led by Lucy Electric's quality teams, provide assurance on process integrity, identify potential risks early, and support continuous supplier development in alignment with its procurement goals.

THE GROUP'S POLICY ON SLAVERY AND HUMAN TRAFFICKING, RELATED PROCESSES AND SUPPLIER DUE DILIGENCE

We remain committed to improving our practices to combat slavery and human trafficking as set out in our Anti-slavery Policy: <http://lucygroup.com/files/2814/9061/4908/Lucy-slavery-doc.pdf>. As part of our on-going efforts to identify and mitigate risk our steering committee comprised of representatives from each business unit and Lucy Group Ltd, continues to oversee the Group's continuing compliance with the Modern Slavery Act. The main aim of the committee is to ensure there are systems in place in all business units to identify, assess and monitor potential risk areas in our supply chains and that all businesses continue to improve their supplier vetting processes. We encourage a culture of continuous improvement. Our business units continue to refine our supplier vetting processes to ensure we are sensibly addressing the risks within our supply chain. We will continue to engage with all our suppliers across all business units to ensure their compliance with our Modern Slavery Policy.

SUSTAINABLE DEVELOPMENT FRAMEWORK

Lucy Group is committed to a sustainable future. We have created a Framework based on the United Nations Sustainable Development Goals (UN SDGs) to place people and the planet at the heart of everything we do. Our selected goals and targets concentrate on the key issues relevant to the Group by providing a balanced approach across these three interlinked pillars: People, Planet and Progress. Within these pillars we have selected seven priority areas including our commitment to support human rights and fair labour practices for our stakeholders

We have established a comprehensive baseline across all our operating businesses and assess our Corporate Social Responsibility (CSR) performance using a CSR Scoring Matrix grounded in the ISO 26000 Social

Responsibility standard. This matrix encompasses seven core elements and 274 attributes, targeting key areas within our Sustainable Development Framework—People, Planet, and Progress—aligned with the United Nations Sustainable Development Goals (UN SDGs). By evaluating how our decisions impact society, we can uncover opportunities to enhance our social responsibility and drive meaningful, lasting change.

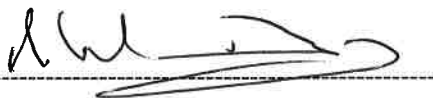
We continue to expect suppliers to sign up to our Supplier Code of Conduct, which outlines our expectations on ethical behaviours and compliance with applicable laws, including human rights and labour rights, preventing slavery and forced labour and allowing freedom of association where permitted by law. We assess our suppliers' risk regarding Modern Slavery through a detailed questionnaire and suppliers who cannot show commitment to addressing such risks are removed as soon as practicable.

NEXT STEPS

In addition to the efforts outlined above during the 2024 financial year and beyond we intend to take the following further steps to reduce the risks of slavery and human trafficking occurring within our businesses and that of our supply chains:

- Following the establishment of a new trading entity in the USA, we will ensure it has the necessary processes to address modern slavery risks.
- Our Real Estate business will continue to improve its management of contractors to ensure their compliance by developing a detailed questionnaire and auditing process and will seek to increase awareness of modern slavery through poster campaigns at all its construction sites and will provide more robust training for its site managers.
- All businesses are required to establish mechanisms for auditing suppliers on their labour practices and to report regular progress on this.

This statement is approved by the Board of Lucy Group Ltd and is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Lucy Group Ltd on behalf of all group companies including Lucy Electric UK Limited for the financial year ending 31 December 2024.



RICHARD DICK, EXECUTIVE CHAIRMAN
LUCY GROUP LTD

Date: 12 June 2025