



Modern Slavery Statement

This is Brush Switchgear's third statement published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Brush Switchgear during year ending 31 December 2018 to prevent modern day slavery and human trafficking in its businesses and supply chains.

Introduction

Brush Switchgear has a zero tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

We are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within our business or supply chain.

Our organisational structure and operations

Brush Switchgear is part of The Brush Group, one of the world's largest independent manufacturers of electricity generating equipment for the power generation, industrial, oil & gas and offshore sectors. It designs and manufactures an extensive range of generators, power management, excitation systems and transformers, and provides comprehensive and integrated aftermarket support tailored to meet customer needs. Brush Switchgear manufactures switchgear products.

Brush is owned by Melrose Industries plc, which has its head office in Birmingham, United Kingdom.

Nature of our supply chains

Our key supply chains involve sourcing raw materials, mainly copper and steel, for heavy and specialised skilled manufacturing and machining of components which may vary in size.

Policies relating to slavery and human trafficking

Our anti-slavery policy reflects our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to act ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our safe-guarding policies and we distribute our policies to our key supply chain along with a supplier self-appraisal forms on a bi-annual basis.

Our policies have been developed in conjunction with Melrose together with the engineering and manufacturing federation and consultation with Unite the Union.

Risk assessment

In order to assess risk within the supply chain, Brush use a risk assessment document to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking.



This risk assessment takes into account high risk countries based on the Global Slavery Index. Our key suppliers are monitored by the ranking of the Global Slavery Index and they are also defined by the criticality of the components used by the business.

Due diligence processes in relation to slavery and human trafficking

As part of our due diligence process, our suppliers are sent a supplier self-appraisal document. All returned and completed documents are analysed and vetted against the risk assessment document. Suppliers that do not return the document are taken off the approved supplier register.

Staff training

We continue to provide training to key staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and our policies and procedures are designed to mitigate this risk.

In addition to regular team briefs, training on modern slavery has been given to current employees and new hires. The training educates employees on the issues surrounding modern slavery and what to do if they suspect that it is taking place either internally or within our supply chain.

In addition, we make specific provision in our whistleblowing policy for the protection of those who whistle-blow in relation to an issue of modern slavery.

Monitoring of our due diligence processes

We will continue to monitor and evaluate the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by:

- Monitoring our current supply chain by the supplier self-appraisal process within a time period of no more than 24 months from the date of the previous stated form;
- Ensuring all new suppliers to the business will be sent the supplier self-appraisal and will not become an approved supplier until a completed and returned form has been returned and a written approval is issued;
- The use of grievance mechanisms;
- The roll out of refresher training to our employees.

Approval for this Statement

This statement was approved by the Board of Directors on ²⁸ June 2019.

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Jonathon Crawford
Director

²⁸ June 2019