

Modern Slavery Statement

This is BRUSH's sixth statement published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the BRUSH Group (that includes BRUSH Electrical Machines Ltd, BRUSH Transformers Limited, Hawker Siddeley Switchgear Limited, Generator and Motor Services of Pennsylvania LLC and BRUSH SEM s.r.o.) during year ending 31 December 2021 to prevent modern day slavery and human trafficking in its businesses and supply chains.

Introduction

The BRUSH Group 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

The BRUSH Group is one of the world's largest independent manufacturers of electricity generating equipment for the power generation, industrial, oil & gas and offshore sectors. We design and manufacture an extensive range of generators, power management and excitation systems and provide comprehensive and integrated aftermarket support tailored to meet customer needs. The business also manufactures switchgear and transformer products.

We are owned by One Equity Partners, which has its head office in New York, United States.

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 all supporting Brush Group policies that underpin this statement are made available to our Suppliers, as appropriate.

Risk assessment

In order to manage risk within the supply chain, BRUSH assesses all new Suppliers using a comprehensive pre-qualification questionnaire which covers modern-day slavery, anti-bribery, corruption, legal compliance and ethical conduct.

Furthermore, BRUSH has developed risk assessment-tool in order to identify-which elements of our own activities and those of our supply chains represent the highest risks in respect of slavery or human trafficking.

This risk assessment tool 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 pre-qualification assessment. All returned and completed documents are analysed and vetted against the risk assessment document. Suppliers that do not adequately complete the document do not become an approved supplier to BRUSH Group.

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. Refresher is regularly rolled out to the workforce. 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:

- Ensuring all new suppliers to the business will be sent the supplier pre-qualification assessment and will not become an approved supplier until a completed and returned form has been returned and a written approval is issued;
- Identify all High Risk Suppliers utilising the risk assessment tool at least every 24 month period
- The use of grievance mechanisms;
- The roll out of refresher training to our employees.

Approval for this Statement



Chris Abbott, CEO

17 June 2022