

Modern Slavery Statement

This is BRUSH's seventh statement published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by BRUSH Group Limited, including BRUSH Transformers Limited and Hawker Siddeley Switchgear Limited (collectively known as BRUSH Group) to prevent modern day slavery and human trafficking in its businesses and supply chains for year ended December 2022.

Introduction

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

BRUSH Group provide agile and adaptive engineering solutions and products, including consultancy services, design and project management as well as award-winning product technology, to a wide range of projects.

A chosen partner for national and regional power generation and distribution network operators, through innovation and a commitment to delivering solutions that address grid-resilience and drive system change, we support the global drive to net-zero, helping to create a future-proof infrastructure.

We are owned by One Equity Partners, whose head office is in New York, United States.

Nature of our supply chains

Our key supply chains involve sourcing raw materials, mainly copper, steel, electrical sub-assemblies and electronics, for heavy and specialised skilled manufacturing, assembly and testing 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 available to our suppliers via a newly created supplier portal on our website, together with the Supplier Quality Manual which is also distributed directly to the supplier base.

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 uses a 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 and ranked using 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 issued with 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 and refresher training 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.

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 are sent the supplier pre-qualification assessment. The supplier will not be approved until a completed form has been returned, validated, and approved.
- Identifying all high-risk suppliers utilising the risk assessment tool and monitoring them on a monthly basis, with re-validation taking place every 12 months.

Approval for this Statement



Nicolas Pitrat

CEO

January 2023