

	BRUSH Group Human Trafficking & Modern Slavery Policy	Document Number	BRUSH-LE/BPL/0010
		Issue	D

Department	Risk & Compliance	Approver	Carole Digby-Lafage	Signature		Last Review	15/04/2026
Classification	Unrestricted					Next Review	15/04/2027
Date:	Reviewed by:		Comments:				
14/11/2022	Debra Jordan		Creation				
12/12/2024	Debra Jordan		Document classification added				
15/04/2026	Carole Digby-Lafage		Amendments to reflect latest organisational changes Amendments to merge Human Trafficking topic Change of document title BRUSH responsibilities paragraph added BRUSH employee responsibilities paragraph updated – incl. examples and red flags. Statement added: EN version prevails over translations Reviewed by Debra Jordan for Legal updates – none required				

THIS PAGE IS INTENTIONALLY BLANK



TRUST. WELL EARNED.

BRUSH Group

Human Trafficking & Modern Slavery Policy

The **BRUSH Human Trafficking & Modern Slavery Policy** must be followed by anyone who works for or represents BRUSH, including directors, officers, employees, agents, distributors, and business associates working for or on behalf of any BRUSH entity, including, but not limited to BRUSH Group Ltd., together with its subsidiaries and affiliates ("the Group").

Employees must gain an understanding of the **Human Trafficking & Modern Slavery Policy** and ensure that its principles are fully applied in relevant areas of their job role.

Purpose

Human Trafficking and Modern Slavery are crimes and violations of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The BRUSH Group and its business units (collectively referred to as the "Group") have a zero-tolerance approach to human trafficking and modern slavery and are committed to acting ethically and with integrity in all the Group's business dealings and relationships and to investing in, implementing and enforcing effective systems and controls across the Group to safeguard against adverse human rights impacts and ensure human trafficking and modern slavery are not taking place anywhere in its business or in any of its supply chains.

The purpose of this policy is to set out the Group's policy standards and obligations under human trafficking and modern slavery legislations, including in connection with the Group's supply chains. This policy cannot cover all possible facts and circumstances nor all applicable anti-modern slavery laws, which may evolve over time. It is broadly reflective of UK human trafficking and modern slavery legislation as addressed in the UK Modern Slavery Act 2015 and the UN Guiding Principles on Business and Human Rights.

Who is covered by the policy

This policy applies to all individuals working at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), contractors, trainees, casual workers/agency staff, volunteers, or any other person working for the Group throughout the world (collectively referred to as "Group Associates" for the purposes of this policy).

This policy also applies to any person, or any organisation, working for or performing a service for or on behalf of the Group – for example, pension trustees, consultants, lawyers, accountants, other business advisers, suppliers, agents, distributors, joint venture partners or other persons whilst they are working for or performing a service for or on behalf of the Group throughout the world (collectively referred to as "External Associates" for the purposes of this policy).

This policy does not form part of any employee's contract of employment and may be amended at any time.

BRUSH responsibilities

BRUSH regularly evaluates its capacity to identify, manage, and prevent risks related to modern slavery and human trafficking. To support this, BRUSH conducts an annual slavery and human trafficking risk assessment at Group level, using the Slavery and Trafficking risk template from the Social Responsibility Alliance - [Social Responsibility Alliance](#) (SRA). Each Business Unit also has the option to carry out its own assessment using this readily available template.

Screening and ongoing monitoring of third parties constitute a key component of BRUSH's control framework.

Employee responsibilities

All Vendors are screened upon registration and are required, through the Supplier Qualification Assessment process, to disclose the extent of their commitments, policies, and programmes addressing human trafficking and modern slavery.

All Associates should be aware and looking out for the following red flags:

- A person appears fearful, withdrawn, anxious, or unusually submissive.
- Someone seems closely monitored, unable to speak freely, or another person answers for them.
- The individual does not control their own passport, ID, phone, or money.

- They are working very long hours, with few or no breaks.
- They appear tired, malnourished, underpaid, or are not receiving wages as expected.
- They may live in poor, overcrowded, or employer-controlled accommodation.
- There are signs of physical abuse, untreated injuries, or poor personal care.
- They seem unable to leave work freely or are always escorted.
- They do not know their home address, their employment terms, or basic details about their job.
- They mention debt to a recruiter, employer, or agent.
- They seem afraid of deportation, punishment, or threats.
- Their working conditions are unsafe, with no proper safety gear, training, or rest periods.
- Their documents, travel, or transport are controlled by someone else.
- They were recruited through suspicious promises, false job offers, or pressure.
- Signs of coercion are noticed in supply chains, such as excessive subcontracting, sudden last-minute orders, or suppliers pushing unrealistic cost cuts.

Within BRUSH, the risks of modern slavery and human trafficking are most likely to arise in relation to agency workers, cleaning staff, and similar roles. However, it is important to recognise that such risks are not limited to these areas and may also emerge in other parts of our operations or supply chain.

Employees should report concerns immediately through the company's escalation or whistleblowing process, even if the concern is only a suspicion. A single warning sign may not prove exploitation, but several together should be treated seriously. Associates should avoid directly confronting any individual who may be at risk, as this could inadvertently compromise their safety or worsen their situation.

All Associates are responsible for ensuring they read, understand, and comply with this policy.

Training on this policy, and on the risk the Group faces from human trafficking and modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

The Group's zero-tolerance approach to human trafficking and modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of a business relationship with them and reinforced as appropriate thereafter.

The prevention, detection and reporting of human trafficking and modern slavery in any part of the Group's business or supply chains is the responsibility of all those working for the Group or under the Group's control. All Associates are required to avoid any activity that might lead to, or suggest, a breach of this policy.

How to raise a concern

All Group Associates are encouraged to raise concerns about any issue or suspicion of malpractice by a colleague or a third party (such as a customer, supplier, or agent) in any part of the Group or the Group's supply chains at the earliest possible stage. If a Group Associate believes that any part of this policy has been infringed, they should refer to the Group's Whistleblowing policy.

If an employee is unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery or a breach of this policy in advance of any action, relevant details should be provided to the Group Risk and Compliance Director via legal@brush.eu. Alternatively, follow the procedure as stated within the Group's Whistleblowing policy. No action as to which there is any doubt regarding compliance may be taken without authorisation by the Group Risk and Compliance Director or Group Legal Director.

Group Associates who raise concerns and report wrongdoing will naturally be concerned about possible repercussions. The Group encourages openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken

The Group is committed to ensuring that no employee suffers any detrimental treatment as a result of raising concerns.

Consequences of a breach of this policy

Any breach of this policy by a Group Associate may lead to disciplinary action being taken by the Group up to and including termination of employment. Where appropriate, the Group will also liaise with relevant law enforcement bodies.

Any breach of this policy by an External Associate may lead to the termination of the business unit's relationship with that External Associate.

The English version of this Policy takes precedence over any translated versions.