

	BRUSH Group Modern Day Slavery and Anti-Human Trafficking Policy	Document Number	BRUSH-LE/BPL/0010
		Issue	C

Department	Legal	Approver	D Jordan	Signature		Date	14/11/2022
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BRUSH Group

Modern Day Slavery and Anti-Human Trafficking Policy

The **BRUSH Modern Day Slavery and Anti-Human Trafficking 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., BRUSH Transformers Ltd., Hawker Siddeley Switchgear Ltd., Aprenda Ltd., Kirkman Utility Services Ltd., Eta Projects Ltd and Hawker Siddeley Switchgear Pty Ltd.

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

Purpose

Modern slavery is a crime and a violation 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 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 to across the Group to safeguard against adverse human rights impacts and ensure modern slavery is 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 modern slavery legislation, 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 modern slavery legislation.

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.

Employee responsibilities

All Associates are responsible for ensuring they read, understand, and comply with this policy. A business unit may have a specific process or policy in addition to this policy which Associates will need to follow.

Training on this policy, and on the risk the Group faces from 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 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 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 Compliance Manager or BRUSH Group General Counsel. 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 Compliance Manager or General Counsel.

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.