

BRIGADE ELECTRONICS GROUP PLC
MODERN SLAVERY ACT 2015 STATEMENT

DATE: 30 April 2023

This statement (**Statement**) is made by Brigade Electronics Group Plc ("**Brigade**", "**it**", "**its**") pursuant to and in accordance with the UK's Modern Slavery Act 2015 (**Act**). It sets out steps and actions proposed or taken by Brigade to:

- (1) assess and understand potential modern slavery risks; and
- (2) prevent modern slavery, human rights violations and trafficking,

in its business and supply base up to and including the date of this Statement.

This is the fourth Statement prepared by Brigade and it aims to further progress and develop its work in this area over the coming years. Brigade will review and update this Statement on an annual basis, and by no later than 3 months after its financial year ending on 31 January, and will make it available on its website or on request via compliance@brigade-electronics.com.

COMMITMENT

As a global business, Brigade accepts it has a corporate social responsibility and endeavours to uphold the highest standards of ethical behaviour and personal integrity within its business operations and supply chains. These values underpin the management and strategic decisions Brigade makes.

Brigade has a zero-tolerance approach to modern slavery and is fully committed to protecting its people and preventing modern slavery, servitude, forced or compulsory labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation in its own operations as well as its supply base.

Brigade is committed to implementing, developing, expanding and evolving policies and practices throughout the Group (as defined below) to combat slavery and human trafficking and to encourage the same principles and standards from its suppliers, distributors and business partners.

BRIGADE STRUCTURE AND BUSINESS

Brigade is a company registered in England and Wales with company registration number 07107804. Brigade is the parent company of the following trading subsidiaries (together "**the Group**"):

	Name:	Location/Jurisdiction:
1.	Brigade Electronics (UK) Limited	United Kingdom
2.	Brigade (bbs-tek) Limited	United Kingdom
3.	Brigade Electronics Inc	United States
4.	Brigade Elektronik GmbH	Germany
5.	Brigade Electronics BV	Netherlands
6.	Brigade Electronics Group (EU) BV	Netherlands
7.	Brigade Elettronica Srl	Italy
8.	Brigade Electronics France SAS	France
9.	Brigade Electronics (Canada) Limited	Canada
10.	Brigade Electronics (Polska) sp. z.o.o.	Poland

None of these subsidiaries is legally required to publish a statement under the Act; however, insofar as they form part of the business / supply chain of Brigade, they are covered under this Statement.

The principal activity of the Group is the design, development, manufacture, marketing, sale and distribution of products and services for on and off-road vehicles and mobile plant/machinery.

CURRENT POLICIES:

In the UK, Brigade has clear policies in place to mitigate and demonstrate its commitment to combating modern slavery and human trafficking in its operations, as follows:

- **Modern Slavery Policy**

Brigade is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in its own business or in its supply chains. Brigade expects the same high standards from all its contractors, suppliers and other business partners.

Brigade specifically prohibits the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

This policy provides that the prevention, detection and reporting of modern slavery in any part of Brigade's business or supply chains is the responsibility of all those working for Brigade or under its control. Such organisations or persons are required to avoid any activity that might lead to a breach of this policy and to raise concerns about any suspicion of modern slavery in any part of Brigade's business or supply chain.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Brigade may terminate its relationship with other individuals and organisations working on Brigade's behalf if they breach this policy.

- **Corporate and Social Responsibility Policy**

Brigade is aware that the running of its business will, in many ways, affect its place of work, the community and the wider environment in which it operates. Brigade believes that the way it runs its business can and should make a positive difference in these areas and it aims to ensure that continued efforts are made to achieve that.

Brigade endeavours at all times to conduct business legally with integrity and respect to human rights. It strives to ensure that it abides by fair labour practices and that its activities do not directly or indirectly violate human rights in any country.

- **Whistleblowing Policy**

Brigade is committed to conducting its affairs lawfully and takes any allegation of malpractice, criminal behaviour, corruption or other wrongdoing very seriously. The purpose of this policy is to encourage employees to raise their concerns within Brigade regarding *inter alia* the following matters, in order that they may be properly addressed:

- a criminal offence
- a miscarriage of justice

- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment of any of the above

- **Health and Safety Policy**

Brigade is committed to ensuring that its requirements concerning health and safety at work, and the environment, are properly understood by everybody and are adhered to constantly. Staff are made aware that they have a legal duty to co-operate with Brigade on health and safety and that they must take reasonable care, not only of their own health and safety, but also those who may be affected by what Brigade does or does not do. Employees are suitably trained to perform their tasks and to recognise potential risks in the work situation. Brigade conducts risk assessments and take all reasonable steps to manage and control foreseeable hazards and risk of harm. Brigade continually seeks to improve best practice and endeavour to provide the time, resource and finance to ensure all persons affected by its operations are protected. Brigade believes that people are its greatest asset and motivates all staff to understand that working safely, and professionally, is the only way forward.

- **Grievance Policy and Procedure**

In order to ensure that staff have every opportunity to raise any grievances which arise out of their employment, and to ensure that these grievances are properly heard and resolved, Brigade has adopted a Grievance Policy and Procedure. This policy lists the following issues as potential causes of a grievance:

- terms and conditions of employment
- health and safety
- relations with other members of staff
- bullying or harassment
- new working practices
- working environment
- organisational change
- discrimination or unfair treatment.

The aim of the policy is to ensure that any such issues which may arise, are remedied fairly and satisfactorily.

- **Bullying and Harassment Policy**

Brigade is committed to best practice in the management of its staff and believes that harassment or bullying in any form is unacceptable. Under this policy, bullying and harassment include overbearing supervision or other misuse of power or position, unfair treatment as well as the creation of an intimidating, hostile, degrading, humiliating or offensive environment. Any incident of harassment will be taken most seriously and may be grounds for disciplinary action, which could include dismissal. In addition, employees who commit serious acts of harassment may be guilty of a criminal offence. Complaints of bullying and harassment will be dealt with under the Grievance Policy and Procedure mentioned above, as well as Brigade's Disciplinary Rules and Procedures.

- **Equal Opportunity Policy**

Brigade is committed to the principle of equal opportunity in employment and is opposed to any form of less favourable treatment or financial reward through direct or indirect discrimination, harassment or victimisation of employees on the grounds of race, religious beliefs, political opinions, creed, colour, ethnic origin, nationality, marital/parental status, sex, age, sexual orientation or disability. The policy extends to all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits. Every employee is required to assist Brigade to meet its commitment to provide equal opportunity in employment and avoid unlawful discrimination. Employees can be held personally liable as well as, or instead of, Brigade for any act of unlawful discrimination. The policy applies equally to the treatment of customers, clients and members of the public.

Brigade has extended its Modern Slavery Policy throughout the Group and provided relevant training to the staff of its subsidiaries.

Brigade is continuing work to extend, implement and apply the other policies mentioned above (or equivalent policies) to each of the subsidiaries to ensure a uniform approach throughout the Group.

BRIGADE EMPLOYEES

Brigade employs only those who are legally entitled to work in the United Kingdom or such country in which they are employed. It has processes in place to ensure that employees' eligibility to work status is validated in line with current legislation.

Brigade endeavours only to use reputable employment agencies to source staff and labour.

In the UK, Brigade employees are each provided with letters of employment plus access to a company handbook and intranet which contains all policies that govern their employment. Each employee has a personal responsibility to read, acknowledge and accept the handbook and policies, as well as to ensure that they fully understand their obligations and the consequences associated with any breach thereof. Through Brigade's current policies set out above, it is made clear that:

- all employees have equal opportunities without any form of discrimination;
- no threatened or actual physical, psychological or verbal abuse of any kind is tolerated;
- Brigade employs only staff who are eligible to work and freely choose to work; and
- Brigade aims to provide a healthy and safe work environment.

Work is ongoing to extend the company handbook to the employees of Brigade's subsidiaries.

SUPPLY CHAIN:

Brigade wishes not to be associated with any business or organisation that is in any way involved in or connected with activity related to slavery or to human trafficking.

Brigade's Operational Leadership Team has set up a Supply Chain Compliance Project ("SCC Project") and Project Team to establish a uniform, risk-based approach/process for assessing and managing Modern Slavery compliance in Brigade's supply chains throughout the Group. This project is ongoing.

Brigade's Quality team conducts scheduled visits and audits of suppliers as part of Brigade's ISO9001 quality management system. The frequency of these visits depends on the outcome of such audits. The aim is to incorporate modern slavery focussed elements to these visits and audits.

Brigade has updated its standard purchasing terms to include contractual compliance obligations on its suppliers in respect of the Act.

INTERNAL MODERN SLAVERY RISK ASSESSMENT

To help identify, manage and monitor the risk of slavery and human trafficking in Brigade's business and operations, Brigade maintains an internal modern slavery risk assessment. Any relevant mitigations and risk treatments are duly documented in the risk assessment and delegated to risk owners for implementation.

EFFECTIVENESS/PERFORMANCE INDICATORS:

Brigade's key performance indicators specifically in relation to slavery and human trafficking are under review as part of the SCC Project.

TRAINING:

Brigade provides relevant training for staff as well as key members of staff who manage supplier relationships or relationships with distributors or business partners who have a higher risk of slavery, throughout the Group.

NEXT STEPS: In summary of Brigade's commitments above, Brigade intends to take the following steps to combat slavery and human trafficking:

- Progress the SCC Project; and
- Progress the implementation of the company handbook and relevant policies at subsidiary level.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 January 2023.

This statement was approved by Brigade's board of directors on 23 May 2023.