



**BRIGADE ELECTRONICS GROUP PLC**  
**MODERN SLAVERY ACT 2015 STATEMENT**

**DATE: 16<sup>th</sup> December 2019**

**BRIGADE PURPOSE: TO SAVE LIVES BY PIONEERING SAFETY SOLUTIONS FOR COMMERCIAL VEHICLES AND MOBILE MACHINERY**

From humble beginnings as a one-man start-up in 1976, Brigade Electronics Group PLC (“Brigade”, “it”, “its”) and its subsidiaries have grown into a multi-national group with approximately 200 employees and sales exceeding £48 million.

Brigade holds a market leading position in vehicle mounted camera monitor systems, visual aids, object detection and warning systems, audible warning systems, and fleet management/driver improvement systems.

Brigade saves lives by providing commercial vehicle and mobile machinery drivers, fleet managers, and manufacturers with safety systems that help prevent collisions between vehicles and pedestrians, cyclists, motorcyclists, other vehicles and inanimate objects.

In November 2014, Brigade’s founder and Chairman, Chris Hanson-Abbott, was awarded an OBE by HM the Queen for services to vehicle road safety and in June 2019 Brigade was awarded the Queen’s Award for Enterprise in the International Trade category.

**STATEMENT**

This statement (**Statement**) is made 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 first Statement prepared by Brigade and it aims to 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](mailto: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”):

	<b>Name:</b>	<b>Location/Jurisdiction:</b>
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 Elettronica Srl	Italy
7.	Brigade Electronics France SAS	France
8.	Brigade Electronics (Canada) Limited	Canada
9.	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, marketing and distribution of commercial vehicle and mobile machinery safety systems.

## **CURRENT POLICIES:**

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

- **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 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.

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..

### **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 is reviewing methods of monitoring its supply base's compliance with the Act.

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.

### **RISK ASSESSMENT**

A high-level risk assessment across Brigade's business and supply base is being conducted to establish and identify those areas of Brigade's operations and supply chain posing a low, medium or high risk of modern slavery and human trafficking.

### **EFFECTIVENESS/PERFORMANCE INDICATORS:**

Brigade's key performance indicators specifically in relation to slavery and human trafficking are under review.

**TRAINING:**

Depending on the outcome of the risk assessments, Brigade will identify training programmes for 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.

**PLAN/OBJECTIVES:**

To give effect to its commitment above and implement a robust anti-slavery programme across the whole Group, Brigade aims to implement the following actions in its business, with a view to extending, implementing and evolving these to the rest of the Group:

- Modern Slavery Risk Assessment
- Corporate & Social Responsibility Policy
- Modern Slavery Policy
- Supplier Code of Conduct
- Supplier Questionnaires / Audits
- Staff training initiatives / programmes
- Key Performance Indicators

This statement was approved by the Brigade's board of directors on 16<sup>th</sup> December 2019.