

Modern slavery statement for financial year 2016/17

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Brucom has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Brucom has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Brucom is a world class manufacturer of electrical systems and assemblies; we operate from our dedicated manufacturing sites in the United Kingdom and supply worldwide to markets such as:

- Automotive
- Defence
- Industrial
- Manufacturing
- Rail
- Medical
- Power Generation

Our supply chain selection is critically managed and vetted by our procurement department to ensure compliance for our operations and clients alike. Brucom is a living wage supplier and is dedicated to the welfare of all persons either directly employed or by association.

Our high risk areas

Raw materials suppliers that operate outside of Europe represent our biggest potential risk that may utilise labour that would be classified under the Modern Slavery Act, to mitigate this we use only those suppliers that fulfil our supplier criteria specifications and who can demonstrate their ability to ensure compliance. This is a system that Brucom will be developing overtime to ensure the selection of credible companies.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.]

Our suppliers

Brucom operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.


Our performance indicators

We will know 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 if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 8th December 2016

Name	Gareth Bruce
Signature	
Date	8/12/2016