

SLAVERY & HUMAN TRAFFICKING STATEMENT FOR BROSE LIMITED, COVENTRY FOR THE YEAR ENDED 31 MARCH 2019

Brose Limited's Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 "Transparency in Supply Chains". This statement sets out the steps Brose Limited has taken to address the risk of slavery and human trafficking taking place within its own operations and supply chains.

1. Structure, Business & Supply Chains

Brose Limited comprises of two plants based in Coventry, West Midlands, which manufacture seat and door systems along with window regulators for the automotive industry. We currently employ 598.5 permanent staff plus 151 agency staff.

Brose Limited is a subsidiary of Brose Fahrzeugteile GmbH & Co KG, which is the fourth largest family owned automotive supplier in the world. Its headquarters are based in Coburg, Germany. The Brose Group develops and produces mechatronic systems for vehicle doors and seats as well as electric motors, drives and electronics for steering, brakes transmissions and engine cooling. Approximately 26,000 employees at 62 locations in 23 countries generate a turnover of 6.3 billion euros. Worldwide, every second new vehicle is equipped with at least one Brose product.

We currently work with 176 suppliers from the following countries: Germany, the Czech Republic, Slovenia, Slovakia, Portugal, Poland, Spain, France, Bulgaria, Romania, the Republic of Ireland, the United States of America, India, Italy, Northern Ireland, Hungary, Turkey as well as the UK. These suppliers adhere to the ISO9001:2015 accreditation and are expected to meet our requirements, which include consideration of social responsibility.

2. Policies in Relation to Modern Slavery & Human Trafficking

Recruitment Practices

Brose Limited undertakes Right to Work checks on all direct employees prior to them commencing their roles with the Company. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work.

Code of Conduct

This is available to all staff via our website. New recruits are required to complete an e-learning module on the Code of Conduct on joining our business.

Trade Unions

Through the Code and employment practices, Brose Limited recognises and respects each employee's right to freedom of association, including the right to join trade unions.

Access to Remedy for Victims

If Brose Limited employees identify any potential signs of slavery, human trafficking or other human rights abuses, they are encouraged to report this to management directly. To date, we have received one report in December of last year relating to illegal immigrants being identified in a vehicle belonging to one of our suppliers. This incident was picked up at border control and dealt with by the appropriate authorities.

Whistleblowing

Brose Limited has a Whistleblowing policy. Employees are aware that they can voice their concerns confidentially with their line manager or a member of the Human Resources Department.

3. Risks of Slavery & Human Trafficking in Brose Limited's Own Operations

We have assessed our slavery and human trafficking risks within our own operations and have taken into consideration the following; the location of our operations, the roles being performed, our recruitment processes and the above reported incident.

We have obtained assurance from key providers of our agency staff with regards to their commitment to respecting human rights, including supplying us with a copy of their Slavery & Human Trafficking Statement, where applicable.

The principal agency we work with, Siamo, are recognized members of the Association of Labour Providers (ALP) and are active participants in the 'Stronger Together' initiative. They hold the Gangmaster Licensing Activity (GLA) licence, ISO 9001:2015 accreditation and have offices that hold the Investors in People accreditation.

They are committed to ensuring there is no modern slavery or human trafficking in their supply chains or in any part of their business. Their Anti-slavery and Ethical Trading Policies reflect their commitment to act ethically and with integrity.

Based on our assessment we deem the risk of slavery or human trafficking occurring within our permanent employee population or agency workers under our direct supervision to be low.

If we became aware of any slavery or human trafficking concerns within our supply chains, we would seek to work with the relevant suppliers to improve conditions for their workforce. We reserve the right to deselect suppliers if they were to fail to make the required improvements within a reasonable timeframe.

As a result of our assessment, we have identified suppliers that may represent an elevated risk for slavery or human trafficking. These suppliers span six countries; the Czech Republic, Hungary, India, Slovakia, Slovenia and Turkey. We are currently seeking further information to understand how these suppliers protect human rights within their operations.

4. Due Diligence Processes in Relation to Slavery and Human Trafficking in our Business & Supply Chains

We are currently looking at ways to audit this subject.

5. Training on Slavery & Human Trafficking

Code of Conduct e-learning reiterating our commitment to respecting human rights has been rolled out to all salaried staff within our two UK based plants. To date, 89% of this population has carried out this e-learning.

We plan to deliver training to those individuals in roles most likely to be in a position to identify and address potential modern slavery risks, including our Human Resources, Purchasing and Logistics functions and to include reference to it in our new induction module to be rolled out shortly.

Signed on behalf of Brose Limited:



Steven Wilkins
Managing Director



Carol Davies
Human Resources Director