

# Modern Slavery Act 2015

This is the second Brightsource Modern Slavery Statement and relates to the financial year ended 31<sup>st</sup> December 2017, issued pursuant to section 54 of the UK Modern Slavery Act 2015. It has been approved by the Board of Directors of Brightsource Ltd.

This statement describes the steps we have taken since our first statement to ensure, so far as possible, that modern slavery does not exist in any form in our business and in our supply chains. In this respect, we continue to develop our risk management programme in order to deliver in our commitment and implement the steps described below.

## 1. Business overview

Brightsource is a £24m Print Management and Technology company based in the UK with offices in Cheltenham, London and Edinburgh. We have particular experience in the not-for-profit, regulated brands, travel and retail sectors, and a strong core competency in data-driven marketing communications. Part of being a leader in our chosen market is that we operate to high social, ethical and environmental standards. It's not enough that we serve our clients in the smartest or most cost-effective way – we also have to do it the 'right' way. Sticking to our principles and standards may at times have a short-term financial impact. But doing so will ensure we succeed in the long-term.

## 2. Policies and our approach to Corporate Social Responsibilities

Our approach to running Brightsource in a sustainable and socially responsible way covers 5 broad areas:

- **Workplace:** the relationship between the company and its staff, and their ability to contribute as free and diverse individuals.
- **Environment:** the impact of our business operations – both directly and indirectly – on the world's ecosystems and natural resources.
- **Marketplace:** the interface between Brightsource and our clients and suppliers.
- **Community:** how Brightsource interacts with and contributes to society.
- **Human rights:** this relates to the freedoms and rights defined in international standards such as the Universal Declaration of Human Rights, and the way in which these may be affected by our business operations.

In keeping with our commitment to continual improvement, both our policies and performance in these areas are regularly reviewed and updated, (at least annually), at Board level. Since our last statement we have developed our Modern Slavery policy, which can now be found within our CSR Policy.

Staff are encouraged to contribute ideas on how we can improve our performance, and where necessary what new measures, or more appropriate measures we can adopt. Our annual performance against key measures will be published internally.



In addition to our commitment described above, the UK Modern Slavery Act 2015, requires manufacturers and other companies who transact business in the United Kingdom to disclose their efforts to eradicate slavery, servitude and forced compulsory labour as well as human trafficking from their supply chains and in their own businesses.

According to the Global Slavery Index, an estimated 30 million people in the world today live in some form of slavery. Everyone has a responsibility to work towards ending these labour conditions. Brightsource is committed to the international effort and to conducting its business in a manner that ensures the absence of slavery and human trafficking in its supply chain.

We do not tolerate modern slavery in any part of our business and require that each of our suppliers conduct business in a lawful and ethical manner including business practices that prevent or eliminate slavery and human trafficking in its supply chain.

### **3. Managing our Supply Chain**

Brightsource has a robust approach to supply chain management and understand that it is critical to the success of our modern slavery strategy and policy to engage with, support and develop our supply chain in this regard. All new suppliers are subject to our detailed audit assessment and then followed up with an onsite audit to better understand attitudes towards, and the arrangements for: general labour and working conditions; human rights; child labour and health and safety management.

In the on-going development of our strategy and policy in relation to modern slavery, Brightsource has taken the following steps:

- i. Updated the pre-qualification process with recording of information relating to modern slavery
- ii. Enhanced obligations in relation to modern slavery with the development of a Supplier Code of Conduct
- iii. Identified risk areas within our supply chain
- iv. Enhanced specific processes relevant to the likelihood of risks from purchasing from the Far East with targeted training relevant to direct employees
- v. Communicated our policy and statement to internal employees involved in procurement
- vi. Communicated our policy and statement to our supply chain

Through our Supplier Code of Conduct, (which contains specific language on slavery and human trafficking) we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in our Supplier Code of Conduct reflect our CSR policy related to but not limited to slavery, human trafficking, conflicts of interest, non-discrimination, anti-bribery and anti-corruption and a provision for whistleblowing.

While compliance with the standards and principles laid out in the Supplier Code of Conduct is self-certifying, Brightsource reserves the right for itself or through third party auditors to conduct, or have conducted on its behalf, unannounced or announced audits of its suppliers' production facilities and business practices to monitor suppliers' commitments.

Brightsource is also a member of the Supplier Ethical Data Exchange (SEDEX), a not-for-profit membership organisation dedicated to driving continuous improvements in responsible and



ethical business practices in global supply chains. We use SEDEX to help us assess risk and manage compliance across our Tier 1 supply base, who are all required to be members and complete a self-assessment questionnaire (SAQ) which includes indicators of forced labour, and share visibility of this information with us as part of our basic due diligence requirements.

We undertake to work closely with our suppliers and we inform them of any high-risk rating within the SAQ and support on any corrective action or areas for improvement. If any areas are found to be of concern we will arrange for a SEDEX Members Ethical Trading Audit (SMETA).

Should a supplier not demonstrate a commitment to engage with Brightsource or any independent auditing company to resolve any issues relating to modern slavery and human trafficking, our ultimate sanction will be to cease trading with them.