

Modern Slavery

The statement reflects Group policy which is followed by all the companies in the David Brown Santasalo Group of Companies regardless of location.

David Brown Santasalo is a world class gear manufacturer. We purchase materials for turnkey solutions from our supply chain which, for the UK business, is based largely in Europe. A minority of suppliers to the UK business are based outside of Europe.

We have a Code of Ethics which includes commitments in respect of anti-slavery and human trafficking. We take a zero-tolerance approach to any instances of slavery or human trafficking that are identified in our supply chain. We also have a specific Anti-Slavery and Human Trafficking Policy which outlines our expectations in respect of practices concerning slavery and human trafficking prevention. We encourage members of staff to report suspected breaches of the Code of Ethics and the Anti-Slavery and Human Trafficking Policy in accordance with our whistleblowing procedures.

In addition to our Anti-Slavery and Human Trafficking Policy, we have in place processes and procedures to identify risks of slavery and human trafficking in our business and supply chains, including:

- fair and transparent recruitment procedures;
- risk assessments of our supply chain in relation to slavery and human trafficking giving consideration to country risk and product/service risk;
- following a risk based approach, anti-slavery and human trafficking due diligence on our suppliers;
- contractual controls, including anti-slavery and human trafficking provisions;
- whistle-blowing procedures.

Anti-slavery and human trafficking training is provided to all staff involved in procuring supplies for the business. This includes awareness of "red flags" which might indicate a risk of slavery and human trafficking, which staff keep in mind when dealing with suppliers, during contractual negotiations, site visits or any interaction with the supplier and its workers.

This statement, which is made for the financial year ending 2018, pursuant to section 54(1) of the Modern Slavery Act 2015, has been approved by the Board of Directors of David Brown Gear Systems Limited and is endorsed by the David Brown Santasalo Group CEO and executive management team.