

# Modern Slavery Act 2015

This is the Brightsource Modern Slavery Statement for the financial year ended 31<sup>st</sup> December 2015, 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 and will plan to take in the future, 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 plan to develop further our risk management programme over the coming years in order to deliver in our commitment and implement the steps described below.

## 1. Business overview

Brightsource is a £40m Print Management and Technology company. We have particular experience in the not-for-profit, financial services, 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 will be regularly reviewed and updated, (at least annually), at Board level. 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.

Brightsource does not tolerate modern slavery in any part of its business and requires that each of its suppliers conduct business in a lawful and ethical manner including business practices that prevent or eliminate slavery and human trafficking in its supply chain. Brightsource expects its suppliers to work above the Ethical Trade Initiative (ETI) base code. The code specifically forbids the use of slave, forced, or involuntary labour of any kind, including unlawful child labour.

### 3. Due diligence; assessing and managing risk

While Brightsource's supply chain is not understood to be at risk of slavery and human trafficking taking place, Brightsource nevertheless takes steps to assess and manage any risk. For example, Brightsource identifies and uses suppliers who share Brightsource's commitment to ensuring the absence of slavery and human trafficking in its supply chain. Suppliers must also ensure that their subcontractors, business associates or employees observe the ETI code. Our supplier audit assessment document was recently updated in light of the Modern Slavery Act and sent to existing suppliers for confirmation of compliance. While compliance with the ETI base code 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 production facilities and business practices to monitor suppliers' commitments. 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. Brightsource is also a member of, and conducts risk assessments of its core suppliers through the SEDEX platform.

### 4. Training

We expect our employees to fully converse with and fully observe the company's policies and procedures. In the next financial year, to assist our staff in their understanding, identification and reporting of modern slavery risks in our supply chain and businesses, we will provide appropriate training and awareness for those involved in procurement and/or supply chain management.