

# Report on Our Commitment to the Fight Against Modern Slavery

May 1, 2024

This report is prepared pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (2023). Where applicable, it also constitutes a statement under the UK's *Modern Slavery Act 2015* and Australia's *Modern Slavery Act 2018*.

In this report, Brock Solutions Inc., it's subsidiaries, and its affiliates (together, "Brock Solutions", "Brock", "we" and "our") sets out our commitment to detect and prevent child labour, forced labour, and human trafficking in all of our activities and business relationships.

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# 1 Structure, Activities, and Supply Chains

#### 1.1 Structure

Brock Solutions provides industry-leading automation solutions and professional engineering services to a variety of industries and sectors (including, airlines, airports, and the manufacturing sector).

We are headquartered in Ontario (Canada) and have other locations in British Columbia (Canada), Texas (USA), North Carolina (USA), Berkshire (UK) and New South Wales (Australia).

Brock Solutions consists of four business units: Transportation & Logistics, SmartSuite, Manufacturing, and the Panel Shop. In turn, the organization is headed by a CEO, President, General Counsel, and other senior leaders.

#### 1.2 Activities

Brock Solutions is an industry-leading engineering solutions and professional services company engaged in the design, build and implementation of real-time solutions for airlines, airports, and manufacturing companies throughout North America and the world.

Since we are primarily an engineering services company, our production and importation of goods is limited (i.e. we wire electrical panels for our controls and automation projects). Our activities relating to such goods are as follows.

## 1.2.1 Production/manufacturing/sale/distribution of goods

Brock's production of goods is limited to the wiring of electrical panels for specialised purposes.

We sell or redistribute such goods as part of an engineered solution which we install for, or deliver to, our customers. These solutions incorporate the items discussed below, and even then, only to a limited extent.

#### 1.2.2 Importation of goods into Canada

Brock Solutions imports certain pre-manufactured electronic components from various locations throughout the world, including China and Malaysia.

## 1.2.3 Locations of operations

Brock Solutions' panel manufacturing (i.e. its wiring of electrical panels) is done in Kitchener (Ontario, Canada), and Irving (Texas, USA). Our main offices are located in Kitchener (Ontario, Canada), Vancouver (British Columbia, Canada), Irving (Texas, USA), and Winston-Salem (North Carolina, USA).

## 1.3 Supply Chains

Brock Solutions procures pre-manufactured electronic products for its projects from established and reputable suppliers (e.g. Dell, Honeywell, and Rockwell) and various Canadian and American retailers, distributors, and resellers like Ingram Micro. Such products include computers, handheld scanners, and electronic displays.



## 2 Policies & Due Diligence Process

Even though the risk is low, Brock Solutions is committed to the detection and elimination of all forms of child labour, forced labour and human trafficking; and we require the same commitment from our vendors and suppliers.

Before making any order from a supplier, the supplier is furnished with our Vendor Code of Conduct. The Code of Conduct puts suppliers on notice that we expect them to conduct business in an ethically and socially responsible manner. There is an express prohibition against indirect and direct forms of child labour or forced labour.

Furthermore, the General Terms and Conditions that we attach to our purchase orders requires suppliers to represent "that neither it nor any of its subcontractors will utilize child, slave, prisoner or any other form of forced or involuntary labour, or engage in abusive employment practices, in the supply of goods or provision of services".

Brock Solutions' procurement, contracting and legal is centralized from its headquarters in Kitchener (Ontario, Canada). Due diligence processes are coordinated from this centralized location.

For its own part, Brock hires skilled labour. We conduct background checks and other appropriate screening before hiring. Such background checks and screening include age verification and confirmation of the candidate's eligibility to work in the jurisdiction in question. Any risks of, or potential for, child labour, forced labour or human trafficking would be discovered and eliminated through such processes and hiring practices.

Brock Solutions has assessed its operations, supply chains, and business relationships and has not identified adverse impacts related to child labour, forced labour or human trafficking. In the absence of such adverse impacts, no additional steps or remediation efforts are being undertaken at present.

## 3 Child Labour and Forced Labour Risks

Brock Solutions imports certain pre-manufactured electronic components from well-established suppliers, distributors, and resellers. Such imports are from a variety of countries, including China and Malaysia.

Nonetheless, our due diligence efforts have not identified any goods imported by Brock Solutions which have links to high-risk countries or regions.

## 4 Remediation Measures

In the absence of any known adverse impacts, the question of remediation is not applicable.

## 5 Remediation of Loss of Income

Since we have not had to take any steps to eliminate child labour, forced labour or human trafficking, the question of remedying loss of income to vulnerable families or individuals has not arisen.

# 6 Training

Business units hold regular meetings (usually bi-monthly). Every member of the business unit is invited, together with members of Brock's leadership team. At least once a year, Brock's General Counsel delivers training to the business units on anti-slavery, anti-bribery, and confidentiality.



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Brock Solutions' Materials Management Team also receives mandatory training upon employment on our procurement policies and due diligence processes, including the Vendor Code of Conduct.

# 7 Assessing Effectiveness

To measure the effectiveness of our approaches to managing the risks of child labour, forced labour and human trafficking in our supply chain, the Materials Management Team relies on information provided by stakeholders like our suppliers.

Similarly, our human resources team conducts background checks and other appropriate screening before hiring. Such background checks and screening include age verification and confirmation of the candidate's eligibility to work in the jurisdiction in question.

If a gap or risk is identified, it is escalated to the General Counsel for appropriate actioning.

As of the date of this report, no instances of child labour, forced labour or human trafficking were detected by our supplier oversight procedures, or human resources processes.

# 8 Review and Approval

Brock Solutions is committed to detection and prevention of child labour, forced labour, and human trafficking in all of our activities and business relationships. We will continue to review our policies, practices, and procedures on a regular basis to identify:

- (a) any such harmful activities; and
- (b) areas for improvement and refinement.

To that end, I attest that:

- 1. I have reviewed the information contained in this report; and
- 2. the information in the report is true, accurate and complete.

I have the authority to bind Brock Solutions,

Vivienne Ojala, CEO and Director

V. Dijaha

May 1, 2024

