



## Report on Our Commitment to the Fight Against Child Labour and Forced Labour (Modern Slavery)

March 31, 2025

(for the period January 1, 2024 – December 31, 2024)

This report is prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). It also constitutes a statement under the UK's *Modern Slavery Act 2015* and Australia's *Modern Slavery Act 2018, mutatis mutandis*.

In this report, Brock Solutions Inc., its 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).

Brock Solutions Inc. is headquartered in Ontario, Canada and has a branch in British Columbia. It's affiliates and subsidiaries are:

- Brock Solutions US Inc., a Nevada entity operating out of Texas, USA;
- Brock Solutions US Systems LLC, a Texas entity operating out of Texas, USA;
- Brock Solutions (Aust.) Pty Ltd., an Australian entity operating out of NSW, Australia; and
- Brock Solutions UK Limited, an English entity operating out of Reading, England.

Brock Solutions Inc. currently employs more than 550 employees in Canada, and a further 350 employees through its foreign affiliates and subsidiaries.

Brock Solutions consists of four business units: Transportation & Logistics, SmartSuite, Manufacturing, and the Panel Shop. Each business unit is headed by two leads: one operating lead and one sales lead, who both report to the executive.

In turn, the organization is headed by a CEO, President, Chief Operating Officer, Chief Finance Officer, Chief Information Officer, Human Resources Leader, and General Counsel; and is overseen by an Advisory Board (which consists of the Director, Chairperson and one Independent Member).

## 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 organizations in North America, and throughout 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 only sell or redistribute goods as part of an engineered solution or system which we install for our customers. These solutions or systems incorporate the items discussed below, and even then, only to a limited extent.

### 1.2.2 Importation of goods into Canada

Brock Solutions imports select electronic components from various locations which include China, Malaysia, and Pakistan. No goods are imported from the Xinjiang Uyghur Autonomous Region of China.

## 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 work installing these panels as part of our solutions occurs throughout the world.

Brock operates in, and has projects in, the following locations:

Australia, Canada, India, Ireland, Mexico, the UK, and the USA.

## 1.3 Supply Chains

Brock Solutions procures electronic components for its projects from suppliers such as Honeywell, Datalogic and various Canadian and American retailers, distributors, or resellers such as BlueStar and Ingram Micro. The electronics which we procure include handheld scanners, electronic displays, electrical wire, and electrical panels.

## 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 our vendors and suppliers to do the same.

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. Due diligence processes are coordinated from this centralized location.

With respect to our own hiring practices, Brock Solutions conducts comprehensive screening and background checks on prospective employees before hiring. Such screening and background checks 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 or forced labour would be discovered and eliminated through such processes.

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

## 3 Forced Labour and Child Labour Risks

Brock Solutions imports select electronic components from various countries including China, Malaysia and Pakistan. China, particularly the Xinjiang Uygur Autonomous Region, has been identified as producing goods using child labour and forced labour. Our due diligence efforts have not identified any goods imported by Brock Solutions which have links to that Region or any other known high-risk countries.

## 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 or forced labour, the question of remedying loss of income to vulnerable families or individuals has not arisen.

## 6 Training

Business units hold regular meetings (usually 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.

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.

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.

## 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; and we will continue to review our policies, practices, and procedures on a regular basis to identify areas for improvement.

To that end, I attest that:

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

I have the authority to bind Brock Solutions Inc.  
and the entities named within this report,



[vivienne.ojala \(Mar 31, 2025 15:47 EDT\)](#)

Vivienne Ojala, CEO

March 31, 2025