

Anti-Slavery Statement

Updated: 25 January 2024

This statement is made on behalf of Brunswick Group Partnership Limited and its affiliated entities (“**Brunswick**” or “**we**”) pursuant to section 54(1) of the Modern Slavery Act 2015 (U.K.) and Section 14 of the Modern Slavery Act (2018) (Australia), as well as any other relevant or similar statutes (together, the “**Act**”).

Group Structure

Brunswick is a critical issues advisory firm specializing in corporate relations. Founded in 1987, Brunswick is a privately held corporation with 27 offices around the world.

Our Commitment

Brunswick is committed to ensuring that there is no slavery or forced human labour in any part of our business or its associated supply chain and ensuring that human rights violations do not occur within our business or any elements of our supply chain.

As an equal opportunity employer, Brunswick is committed to ensuring that all colleagues feel safe and respected in the workplace. We want all colleagues to feel confident that they can report any suspected wrongdoing without risk to themselves.

Our policies are dedicated to ensuring that all prospective employees are entitled to work in the relevant jurisdiction, and to safeguarding employees from abuse and coercion.

Brunswick does not work with any organization, anywhere in the world, that we know to support forced labour.

Brunswick’s Supply Chain

Brunswick strongly believes in maintaining effective transparency across all areas of its business. Given the nature of the services we provide, we have a simple supply chain model built around supporting our core business advisory practices and maintaining our global premises, systems and infrastructure.

The service providers that support our business can be broadly grouped as follows:

1. Physical business services – e.g. services and products we purchase to maintain our global office environments, including cleaning, security, and stationary/ printer providers;
2. Information services – e.g. physical and digital sources of information used for research;
3. Data services – e.g. information technology services, infrastructure and software tools we procure in order to facilitate the management and storage of data that the business generates or receives;
4. Professional services – e.g. external lawyers, accountants, property agents and insurance specialists; and
5. Travel services – e.g. travel by our employees and consultants for business purposes, travel agents and other booking providers.

Human Trafficking and Modern Slavery

While we do not have any formal organisational procedures in place specifically relating to human trafficking, we do however, review current clients and suppliers and will investigate further where we believe there is any risk of human trafficking.

Compliance and Policies

Brunswick has implemented a number of human resource, compliance and risk policies which all employees must comply with, including:

- Anti-Harassment and Discrimination (Global Edition)
- Ethical Standards (relating to anti-bribery and corruption)
- Whistleblower Policy
- Anti-Retaliation Policy

Whistleblowing Policy and Anti-Retaliation

Employees are required to report any suspected wrongdoing or violations of Brunswick policies. Brunswick has implemented a process through which employees may formally raise and escalate any issues of potential concern within the business, including on a confidential basis. This includes, without limitation, issues relating to slavery or forced human labour.

Anyone believing that they may have relevant information to report may do so via one of the following methods:

- Via the independently administered, third-party provider, EthicsPoint/NAVEX <http://www.brunswickgroup.ethicspoint.com> or via its hotline:

Australia	1800 306 510
Belgium	0800 13 342
Brazil	0800 762 0032
China	400 120 9389
France	0800 90 43 28
Germany	0800 181 3014
Hong Kong	800 902 148
India	022 5097 2951
Italy (includes San Marino, Vatican City)	800 819 536
*Japan	*Coming soon
Portugal	800 815 095
Saudi Arabia	800 850 1649
United Arab Emirates	800 0120260
United Kingdom & Northern Ireland	0800 066 8927
United States	1-855-409-9984
Singapore	800 492 2774
South Africa	080 001 0748
Spain	900 751 437
Sweden	020 79 62 49
- By contacting our Global Compliance (Compliance-Glo@BrunswickGroup.com), Legal (USLegal@BrunswickGroup.com) or People (GlobalHRLeads@BrunswickGroup.com) teams.
- By mail to Kavi Reddy, Co-General Counsel, Brunswick Group, 1114 Avenue of the Americas, 24th Floor, New York, NY 10036, USA

Retaliating against anyone making a report in good faith, providing information or cooperating with an investigation is a violation of Brunswick policy.

Ethics and Anti-Corruption

- Brunswick requires all of its employees to adhere to its core compliance policies including: Ethical Standards Policy (covering anti-bribery and anti-corruption), Global Anti-Harassment and Discrimination, Whistleblower Policy, Insider Trading, Cybersecurity, Responsible Use of Artificial Intelligence.
- All employees are required to complete compliance training on at least an annual basis covering the policies listed above.
- Brunswick thoroughly investigates any internal or external allegations of a breach of our ethical standards or policies, and any such matters will be handled promptly, with corrective action taken if/as needed.

Compliance Measures

- We take a risk-based approach to the assessment of suppliers in the context of the Act, assessing whether a particular supplier has any risk of slavery or human trafficking issues based on industry, geography, other risk factors.
- We will use reasonable efforts to include a requirement in our commercial agreements that suppliers (and any sub-contractors they utilize in performance of services for us) comply with the Act.
- We will use reasonable efforts to reserve for ourselves a right of audit in our commercial agreements with suppliers in the event that we suspect that a supplier is in breach of the Act.
- We will use reasonable efforts to include a termination right in our commercial agreements with suppliers in the event that we have reasonable evidence to suggest that a supplier is in breach of the Act.
- Brunswick has a Whistleblower Policy that requires employees to promptly report any concerns they may have of any violation of our ethical standards or policies, including specifically any allegation of slavery, forced labor, or human trafficking within our organisation or supply chain.