



# Modern Slavery Statement

## Introduction

Rotork plc, and its subsidiary companies (together, "Rotork" and throughout this Statement "our" and "we"), recognise their responsibilities as a global engineering group, to ensure that slavery and human trafficking is not occurring in any part of our business or supply chain.

This Statement sets out the steps we have taken during 2020 to ensure slavery and human trafficking is not taking place in our businesses or our supply chain. It reflects the progress that we have made on the actions and initiatives we outlined in our 2019 statement and explains the steps we aim to take in the coming year.

## About us

We design, manufacture and service actuators, flow control equipment and instruments for use across the world, in a wide range of sectors including oil and gas, power, water, mining and marine.

We are headquartered in Bath, United Kingdom with 20 manufacturing sites, 65 national offices, and 83 regional locations in 37 countries. We have a workforce of nearly 3,400 employees and engage with more than 4,000 global suppliers.

## Setting clear expectations

In 2020 we continued to work towards embedding our corporate Values (Stronger Together, Always Innovating and Trusted Partner) and our Employee Code of Conduct across our organisation worldwide. Both our Values (which were chosen by our people) and the Employee Code of Conduct were launched in 2019. They emphasise our focus on being a responsible business and highlight to our employees the role they can play in ensuring Rotork operates ethically and responsibly. This includes 'speaking up' if they are concerned, especially in relation to modern slavery. We have run awareness-raising and capacity building campaigns within our business and held events at our sites to embed our Values and Employee Code of Conduct within our business. We have also expanded our induction training to ensure our new joiners are aware of and understand them.

We have continued to implement our Speak Up Policy and ensure it is accessible worldwide. We work with SafeCall, whose experienced complaint handlers are able to identify reports which may be related to modern slavery. We aim to make reporting as straightforward as possible, recognising that our staff may be the first to identify an issue. We received a small number of reports through our Speak Up mechanism as well as through other routes of escalation, although none of these related to modern slavery. We continue to deal with all reports efficiently, effectively and consistently.

## How we assess our risks

The Global Covid-19 pandemic has made travel challenging during the course of 2020. Where it has been possible, our directors and other senior managers continued to make regular visits to our locations around the world and have remained alert to indications of any risk of modern slavery and

human trafficking. In addition, our internal auditors, who are experienced in the kind of indicators which could reveal the presence of modern slavery, usually perform sites visits (2019: 31) however travel was limited in 2020 due to regional lockdown measures globally.

In 2020 we developed a new risk-based supplier assessment tool which we have started to roll out. In late 2020 we contacted approximately 1,300 of our key suppliers who together account for the majority of our procurement. We have asked them to provide us with a completed questionnaire which aims to improve our understanding of the measures they take to prevent modern slavery and human trafficking among other things.

In addition to confirming whether our suppliers are familiar with our Supplier Code of Conduct (see below) and have relevant policies of their own in place, we also ask detailed questions about their workforce, and how they ensure certain standards are met in relation to their workers. We are in the process of collating and reviewing the responses we have received to date and are following up periodically with those who are yet to complete the questionnaire. We aim to continue this process in 2021 and aim to take a risk-based approach to following-up with individual suppliers as appropriate. We have engaged external advisors to help us ensure our processes are designed to be as effective as possible.

We continue to engage an independent intelligence provider to help us understand any risks associated with new suppliers as well as to monitor our existing suppliers. In 2020 we were able to increase the number of suppliers we are able to monitor from approximately 600 to 3,500 entities.

### **Engaging with our suppliers**

Our Global Strategic Sourcing Team aims to ensure a consistent and robust approach to the way in which we engage with our suppliers.

Our supplier selection and approval procedure considers a number of criteria, including in relation to training and human resources and health and safety. If appropriate, the selection process may involve a site visit.

Our standard contract terms require our suppliers to adhere to our [Supplier Code of Conduct](#). This makes clear that our suppliers, and anyone working on their behalf, must never use compulsory or forced labour, or any other form of slavery or servitude. It also sets out our expectation that they will work diligently to ensure that their own supply chains do not use such practices. In addition, our Supplier Code of Conduct requires our suppliers to meet minimum standards in relation to human rights, anti-bribery and corruption, employment practices, health and safety and the environment.

As part of the review and ongoing development of our supplier relationships, we continue to specifically assess the slavery and human trafficking risks arising from each such relationship and identify appropriate steps to address any risks identified. Such steps may include placing appropriate contractual obligations on suppliers, working with the supplier to make improvements/ corrective action plans or ceasing to work with a supplier entirely.

### **Remaining alert**

We recognise the need to remain alert to modern slavery and human trafficking risks. We continue to engage in online monitoring, business reviews and audits of our suppliers where these are appropriate. We make training on modern slavery issues available to our procurement teams and others who are involved with our supply chains.

In 2021 we aim to work towards continuous improvement of the measures we already have in place to identify and address modern slavery and human trafficking risks. Specifically, we will (i) review our non-UK modern slavery reporting and compliance requirements, (ii) introduce a group-wide policy setting out our approach to managing modern slavery risk, (iii) promote training and awareness on our modern slavery risks, and (iv) adopt KPIs to monitor implementation of our modern slavery actions and their effectiveness.

### **The Modern Slavery Act**

This statement is made on behalf of Rotork plc and its subsidiary companies, including Rotork Controls Limited and Rotork UK Limited, under s54(1) of the Modern Slavery Act 2015.

This statement has been approved by the boards of Rotork plc, Rotork Controls Limited and Rotork UK Limited.

A handwritten signature in black ink that reads "Kevin G Hostetler". The signature is written in a cursive style with a horizontal line extending to the right.

Kevin Hostetler  
Chief Executive Officer  
March 2021