



# Modern Slavery Statement 2024

## 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. Until such time as these risks have been eradicated globally, we are committed to working with our partners, suppliers and other interested parties to identify and mitigate modern slavery risks within our operations, business and our supply chain.

This Statement sets out the steps we have taken during the financial year ended 31 December 2024 to ensure slavery and human trafficking is not taking place in our businesses or our supply chain. It is intended to provide an update on our progress with strengthening our modern slavery risk management framework and explains the steps we aim to take in the coming year.

## Our Business and Supply Chain

### Our business

Rotork is a market-leading global provider of mission-critical intelligent flow control and instrumentation solutions for oil & gas, water and wastewater, power, chemical process, and industrial applications. We help customers around the world improve efficiency, reduce emissions, minimise their environmental impact and assure safety.

We are headquartered in Bath, United Kingdom with 66 locations globally and serve over 170 countries through a global service network. We have a workforce of about 3,500 employees.

### Our supply chain

Rotork's manufacturing processes are primarily assembly of purchased components, with some machining of metallic products, including late customisation to meet customer requirements.

Our Global Supply Chain (GSC) team co-ordinates commodity specific strategies and brings consistency to our Supplier Relationship Management processes with the goal of transitioning to a supply base that enables us to be responsive to our customers while reducing our inventories and meeting high ethical and technical standards. During 2024, we updated our leadership structure by combining the procurement and supply chain functions under one director. This change supports our ongoing development of supplier management processes.

In 2024, we engaged with around 5,300 suppliers and spent around £228m with external material suppliers. Of those approximately 82% are domestic suppliers and 18% supply to our sites internationally.

## Our Values and Policies

Rotork has earned a reputation for integrity, fair dealing, and ethical behaviour. We are determined to preserve that reputation and ensure that, wherever we do business or operate around the world, we exert a positive influence. Acting ethically and in line with our values is rooted in our culture and reflected in our Code of Conduct, which was updated in 2024 and published on our external website. We expect everyone working for us, and with us, to follow the Code of Conduct and act with integrity at all times.

The **Code of Conduct** includes guidance on the identification of potential modern slavery risks and empowers employees to “Speak Up” if they identify any area of concern, including concerns relating to potential modern slavery risks.

Our **Modern Slavery Policy** reflects our commitment to implementing and enforcing effective systems and controls. The policy applies to all employees, is available on our intranet and is translated into six languages. To raise awareness, it outlines key indicators of modern slavery and higher risk activities, such as in our supply chains and outsourced activities, and recruitment through staffing agencies. The policy also contains key performance indicators to assess the effectiveness of our control measures.

Rotork has an open and transparent culture underpinned by our **Speak Up Policy**. The policy encourages colleagues to report suspected wrongdoing as soon as possible and without fear of detrimental treatment as a result of raising a concern. We offer a **range of channels for raising concerns**. Our policy encourages colleagues to contact their line managers, our Head of Ethics and Compliance, our Chief Human Resources Officer or our Group General Counsel & Company Secretary. We also offer an independent, global, and multi-lingual external reporting service managed by Safecall. This service allows concerns to be raised anonymously if preferred. It is available to employees, external stakeholders (such as suppliers) and the public and is operated 24 hours a day, 7 days a week. Reports can be made to a local freephone number or submitted via Safecall’s website. All reports we receive are dealt with efficiently, effectively, and consistently.

Our Speak Up poster is exhibited in all our offices and facilities and highlights modern slavery as a specific area of concern to look out for and report.

Our mandatory **compliance certification process**, launched every year in January, requires all Rotork employees and contractors to confirm that they have adhered to our Code of Conduct and Compliance policies during the preceding year (including our Modern Slavery Policy), and have completed all mandatory training.

Our standard contract terms require our suppliers to adhere to our Supplier Code of Conduct. The Code sets out our zero-tolerance policy on compulsory or forced labour, or any other form of slavery or servitude. It requires our suppliers to meet minimum standards in relation to human rights, anti-bribery and corruption, employment practices, health and safety and the environment. Our suppliers are periodically asked to review and confirm compliance with the Code and their responses verified as part of our audit programme (described below). The Code also sets out our expectation that suppliers will work diligently to ensure that their own supply chains meet similar standards.

## Assessment and Management of Modern Slavery Risk

### Our operations

As part of Rotork's routine and non-routine visits to and audits of our suppliers, our Supplier Quality Engineers, Category Managers, regional and local Supply Chain staff as well as the wider Rotork leadership team remain vigilant regarding indications of any risk related to modern slavery and human trafficking.

## Our supply chain

We conduct **risk assessments** on our suppliers to determine their risk category, and consequently, the appropriate level of due diligence to be applied. Our risk-based supplier assessment model uses open-source indices provided by credible organisations such as UNICEF, International Labour Organization (ILO) and Transparency International to differentiate risk by country. The model covers human freedom, prevalence of child labour, bribery and corruption, health and safety and the commodity provided.

Our supplier **selection and approval procedures** consider several risk areas, including modern slavery, and human rights issues more generally. Information is initially gathered through the completion of a self-assessment questionnaire. Among other things, this questionnaire requires the supplier to confirm whether they are familiar with our Supplier Code of Conduct and have relevant policies of their own in place, and includes questions about their workforce, and how they ensure certain standards are met in relation to their workers. Additionally, we ask our key suppliers to provide more detailed information, to understand more specifically the measures these suppliers have implemented to prevent modern slavery. Where appropriate, the selection process may involve a site visit.

As part of the review and ongoing monitoring of our supplier relationships, we continue to assess the slavery and human trafficking risks arising from relationships through regular as well as incident-driven supplier audits. We 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, or ceasing to work with a supplier altogether.

Throughout the year, our Global Supply Chain team conducts site visits (qualifying new suppliers or re-evaluating existing suppliers) as well as remote reviews for assessment or re-evaluation. Further visits are conducted locally by the factory-based teams. In 2024, none of these site visits or remote reviews identified modern slavery concerns.

In 2023, we commenced an **ESG 'deep dive' project**, designed to further scrutinise our suppliers conduct in this area. An important part of this project is to identify whether compulsory or forced labour, or any other form of slavery or servitude is occurring, and to address any concerns that might be identified. The project covers suppliers with an annual spend of over £5,000 per annum. This consists of approximately 2,300 suppliers and accounts for around 98.7% of our total spend. Suppliers are risk rated, according to various factors including the country, commodity or service provided, nature of the organisation and the type of relationship that we have with them.

We evaluate high-risk suppliers to determine what action to take. A targeted assessment document is sent for completion by the supplier. Where applicable, the supplier must provide documentation to evidence their response. Highest risk activities and certain medium risk suppliers are then audited on-site for verification purposes. The project is initially focussing on Malaysia, Mexico, Thailand and the Middle East. During 2024 we completed the work in Malaysia and Thailand. We will continue to focus on suppliers located in higher risk countries in 2025. Any modern slavery concerns identified will be addressed appropriately.

## Staffing agencies

Our use of staffing agencies increases the risk that Rotork could be unknowingly exposed to modern slavery risks. To address this, clauses on modern slavery and adherence to our Supplier Code of Conduct are included in our staffing agency contracts and only those who have signed these terms can be used to source temporary staff. We also work closely with our staffing agency partners to ensure they adhere to Rotork's standards.

## Key Performance Indicators

We have developed key performance indicators (KPIs) to monitor the risk-based actions we are taking and assess the effectiveness of our modern slavery-related control measures. The KPIs are reviewed annually and updated as appropriate.

## Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff.

Employee training and awareness is one of the core elements of our Compliance programme and continued to be an area of significant focus in 2024. To improve awareness and understanding of our updated Code of Conduct, we have launched a new Ethics & Code of Conduct training course to existing employees via our Learning Management System (“LMS”) which gives us the flexibility to deliver a range of legal compliance training content to employees and provides full auditability. We have also developed training resources for managers of non-digital users. The training includes a module on Modern Slavery and Human Trafficking, including how to recognise and prevent it.

We also have a mandatory induction programme for all new hires with access to the LMS, which contains a module on modern slavery. The course is designed to build knowledge of, and capability to manage, risks and covers:

- What modern slavery is, its forms and key indicators;
- How to identify and respond to modern slavery risks;
- Key risk areas; and
- How to report concerns.

The course also provides targeted content for members of the Rotork Management Board and our Procurement and Human Resources functions.

## Effectiveness, Progress and Year Ahead

Rotork continually looks for ways to support the promotion of human rights within our operations and our sphere of influence. We respect internationally recognised human rights, as set out in the United Nations International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. These cover freedom of association, the abolition of forced labour, equality and the elimination of child labour. We continue to engage in risk assessment, business reviews and audits of our suppliers as appropriate.

In 2025, we will continue to work towards improvement of the measures we already have in place to identify and address modern slavery and human trafficking risks. Actions we aim to take in 2025 include:

- Updating the Supplier Code of Conduct in line with the new Code of Conduct and reflecting industry benchmarking;
- Preparation and delivery of bespoke training to stakeholders on the updated Supplier Code of Conduct;
- Continued inclusion of our Modern Slavery, Code of Conduct and “Raising Concerns” online modules as part of our new hire training programme;
- Continuation of annual confirmation declarations from all employees for adherence to the Code of Conduct and associated policies, including the Modern Slavery policy;
- Continued enhancement of our supplier risk analysis to the extent necessary;
- Maintaining our supplier site audit programme as part of initial onboarding, periodic re-evaluation or where the need for an audit is identified through supplier risk analysis;

- Continuation of our ESG focussed 'deep dive' project; and
- Ongoing monitoring of KPIs.

### **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.



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Kiet Huynh  
Chief Executive Officer  
March 2025