

# Goodwin PLC

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## Goodwin PLC Statement on Modern Slavery and Human Trafficking

### Introduction

The Group is committed to ensuring that its companies and supply chains do not undertake any activity which contravenes the UK Modern Slavery Act 2015 (Act). The Group has a 'zero tolerance' policy to slavery and human trafficking.

As required by the Act we are required to disclose the steps we have taken during the year to identify and eradicate modern slavery and human trafficking. These include an assessment of country, sector, transaction and partnership risks through an induction and awareness programme reviewed by the Audit Committee for effectiveness. Transparency is encouraged through whistle blowing awareness and the maintenance of personal visits by management where possible. Particular attention is paid through our Know Your Customer policy to find true identities and during the year to 30th April 2018 Steven Birks, a Main Board Director was nominated to mentor all subsidiaries in risk analysis including the effectiveness of KYC. Considerable effort was also put in to implement the requirements of the General Data Protection Regulation to avoid identity theft through fraud.

### Supply Chains and Suppliers

The Group focuses on manufacturing within mechanical engineering and refractory engineering sectors. Our mechanical engineering sector serves the oil, petrochemical, gas, LNG and water markets as well as defence contractors, civil aviation authorities and border security agencies. Our refractory sector serves the jewellery casting, aerospace, fire protection, tyre moulding and shell moulding casting industries.

The Group operates in the UK, Australia, Brazil, China, Finland, Germany, India, South Africa, South Korea and Thailand.

The makeup and complexity of supply chains :

- Both Goodwin International and Noreva purchase the major value of their sand mould castings from Goodwin Steel Castings. Nine of our jewellery casting manufacturing companies buy manufactured cristobalite from another of our UK refractory companies, Hoben International.

### Policies

The Group has the following policies in place:

- Conflict Minerals:  
As part of our commitment to Corporate Social Responsibility we use our best endeavors to ensure that none of the materials we source are associated with the Democratic Republic of Congo
- Ethical trading policy
- Privacy Policy
- Know Your Customer Policy

The Group will consider adopting and implementing the good practice guidance and tools such as Stronger Together ([www.stronger2gether.org](http://www.stronger2gether.org)) across the Group and review existing policies to assess how these work to prevent modern slavery.

## Due Diligence

**Supply chain ethics:** We visit and write letters to our major suppliers in line with the United Nations Global Compact voluntary initiative. The letters invite our major suppliers to adopt, implement and evidence adequate compliance policies.

**Anti-Slavery and Human Trafficking Policy:** The Group has implemented and introduced for major suppliers:-

- A Code of Ethical Purchasing (based on international standards including Universal Declaration of Human Rights and the International Labour Organisations Core Convention on Labour Standards) and extends this to suppliers and subsidiaries.
- Reviewed supplier pre-qualification questionnaires, to avoid modern slavery before engaging with new suppliers across the Group.
- That major suppliers to the Group agree to modern slavery provisions in writing
- That they should have a grievance mechanism in place that is specifically targeted at suppliers and subsidiary workers or requires suppliers and subsidiaries to have a grievance mechanism in place
- Suppliers and subsidiaries to have modern slavery provisions in their supply chain contracts cascading responsibility down the supply chain.
- In high risk countries to obtain evidence through visits or written assurance that evidence is available that they operate ethically (and in line with an Ethical Purchasing Code)

## Monitoring

The Group will take steps to regularly assess, prevent, manage and mitigate the risks within our business and supply chains in high risk countries as identified on the Global Slavery Index (<https://www.globallslaveryindex.org/index/>).

## Training

In 2016, Directors and Senior Management attended a Culture and Conduct workshop at our Business conference which dealt with Corporate Social Responsibility issues such as modern slavery and human trafficking.

During the year to 30th April 2018 considerable effort was made in setting up on-line training courses in respect of many of the Group's policies including, amongst others, those on Modern Slavery and KYC. Directors of all subsidiaries are encouraged to undertake these courses and tests and also to flow the values and best practices down within their own companies taking into account local legislation in order to achieve an understanding of best practice. This was re-emphasised during a recent business conference attended by Directors and senior managers.

 [Home Office Supply Chain Transparency](#)

This Statement was approved by the Board on 29th October 2018 and is signed on its behalf by:



John W Goodwin  
Chairman