

Goodwin PLC

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Goodwin PLC

Modern Slavery and Human Trafficking Statement

Goodwin PLC and Goodwin International Limited

At Goodwin PLC, we have a long standing commitment to high ethical standards and expect our employees and everyone that we do business with, including our suppliers, to have the same high standards. Modern slavery is a crime and an abuse of human rights. It is constituted in the UK Modern Slavery Act by the offences of slavery, servitude and forced or compulsory labour and human trafficking. We do not tolerate such abuses in our business or supply chains and we are committed to improving our practices to eliminate any abuse or exploitation.

Business, Structure and Supply Chains

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's head office is located in Staffordshire in the United Kingdom and operates within Australia, Brazil, China, Finland, Germany, India, South Africa, South Korea, Thailand and the UK with a workforce of more than 1,000 employees.

Throughout the Group's history it has built up a network of trusted suppliers, consisting primarily of manufacturing entities as well as service providers. Internally both Goodwin International and Noreva purchase the major value of their sand mould castings from Goodwin Steel Castings. Seven of our jewellery casting manufacturing companies buy manufactured cristobalite from another of our UK refractory companies, Hoben International.

Policies

The Goodwin PLC and its subsidiaries are continually reviewing and improving their policies in line with the United Nations Global Compact's ten universal principles. In addition to the Modern Slavery Policy, the following policies are 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
- Equal Opportunities
- Privacy Policy
- Whistle Blowing
- Know Your Customer Policy

As required by the Act this Statement sets out the steps Goodwin PLC has taken during the recent financial year to safeguard against slavery in its various forms and human trafficking is not taking place in our businesses or our supply chains.

Throughout the year, adherence to our policy is mandated through our general contractual Conditions of Purchase. Furthermore, letters have been sent out to suppliers requiring our suppliers to adopt, implement and evidence adequate compliance in line with our policy and particular attention is paid through our Know Your Customer policy to find true identities.

Transparency is encouraged through whistle blowing awareness and the maintenance of personal visits by management where possible. No potential modern slavery concerns, or signs of such issues, were identified at any of our locations. However, we are mindful that we need to safeguard against complacency and remain diligent in this regard.

The effectiveness of these steps continue to be monitored by the Audit Committee.

Currently, the Goodwin PLC Board is looking to develop a comprehensive code of conduct for our employees that is intended to act as a global policy framework, setting out the behaviors, practices and standards we expect not only of our employees to adhere to but all we engage with.

Due Diligence

As a part of the Anti-Slavery and Human Trafficking Policy the Group has implemented:

- 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 anti 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 anti 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

At our Business conference, Directors and Senior Management receive training, raising the awareness and ensuring that the delegates understand the importance of the issue of Modern Slavery & Human Trafficking.

This awareness is enhanced through the on-line training courses that was set-up in previous years, whereby the Directors of all subsidiaries are encouraged 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 statement is made on behalf of Goodwin PLC and its subsidiary companies, including Goodwin International Limited, in accordance with the obligation to make a modern slavery statement (Statement) under s54(1) of the Modern Slavery Act 2015.

This Statement was approved by the Board on 24th October 2019 and is signed on its behalf by:



T.J.W Goodwin
Chairman