Goodwin PLC | Est. 1883

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Goodwin PLC

Modern Slavery and Human Trafficking Statement for
(1) Goodwin PLC;
(2) Goodwin International Limited; and
(3) Goodwin Steel Castings Limited

This statement is issued by Goodwin PLC, Goodwin International Limited and Goodwin Steel Castings Limited.

This statement relates to the financial year ended 30 April 2026 and sets out the steps taken by the Group during that period to identify and address the risks of modern slavery and human trafficking within its business operations and supply chains.

We are committed to preventing acts of modern slavery and human trafficking from occurring within our business and we expect the same high standards from our employees and everyone that we do business with, including our suppliers. Modern slavery is a crime and an abuse of human rights. This statement is made pursuant to the UK Modern Slavery Act 2015 (**the Act**). The Act makes serious violations of human rights an offence including slavery, servitude and forced or compulsory labour and human trafficking.

This statement is made pursuant to section 54 of the Act and sets out the steps taken by the Group to identify and address the risks of modern slavery and human trafficking within its business operations and supply chains during the relevant financial year. We are actively committed to eradicating all forms of modern slavery and human trafficking from our business operations and supply chains. As part of our commitment, the Chairman of Goodwin PLC stated that:

"*We do not tolerate any modern slavery abuses in our business or supply chains and we are committed to improving our practices to combat any slavery and human trafficking abuse or exploitation*"

Business, Structure and Supply Chains

We focus on manufacturing within mechanical engineering and refractory engineering sectors.

- The mechanical engineering sector serves the nuclear, oil, petrochemical, gas, LNG and water markets as well as defence contractors, civil aviation authorities and border security agencies.
- The refractory sector serves the jewellery casting, aerospace, fire protection, tyre moulding and shell moulding casting industries.

Our head office is located in Staffordshire in the United Kingdom with subsidiary companies operating from Australia, Brazil, China, Finland, Germany, Ghana, India, South Africa, South Korea, Thailand and the UK. We have a workforce of more than 1,000 employees. To find out more about the nature of our business, please click www.goodwin.co.uk.

Directors: T. J. W. Goodwin (Chairman) - M. S. Goodwin (Managing Director, Mechanical Engineering Division)
S. R. Goodwin (Managing Director, Refractory Engineering Division) - B. R. E. Goodwin
N. Brown - A. Deeth - A. Thomas - J. E. Kelly (Non-Executive) - C. A. McNamara (Non-Executive)

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We operate from a wide range of countries and industries and we focus our efforts where we believe there is the highest risk of a violation of the Act. Given our operations across many countries, we recognise the varying levels of risk across different jurisdictions and have tailored our approach accordingly. We have built up a network of trusted suppliers, consisting primarily of manufacturing entities as well as service providers. Within the mechanical business, Goodwin Steel Castings Limited manufactures the majority of the castings supplied to both Goodwin International Limited and Noreva GmbH. Within the refractory business, six of our casting powder factories for the jewellery industry buy manufactured cristobalite from another of our UK refractory companies, Hoben International Limited.

Given the international nature of the Group's operations and supply chains, we recognise that the risk of modern slavery may vary depending on the country, industry, nature of the goods or services supplied and the characteristics of individual suppliers. Particular attention is given to suppliers operating in higher-risk jurisdictions, labour-intensive activities and arrangements involving subcontracted or temporary labour. Our approach is proportionate to the risks identified and takes account of the nature and scale of our business relationships.

Policies

We regularly review our policies including taking account of relevant legal requirements and internationally recognised principles of responsible business conduct. As part of our commitment to combating modern slavery, we have implemented a comprehensive suite of policies to ensure ethical conduct, including:

- Conflict Minerals: As part of our commitment to Corporate Social Responsibility we make every effort 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
- Sanction Policy (which includes a Know Your Customer (KYC) and anti-money laundering polices)
- Supplier Code of Conduct

As required by the Act, this Statement sets out the steps that have been 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 and our Supplier Code of Conduct.

We encourage employees and other stakeholders to raise concerns relating to modern slavery or unethical conduct through our established reporting procedures, including our whistleblowing arrangements. Management oversight and visits to Group operations also provide opportunities to identify and address potential concerns. Any concerns identified are considered and escalated as appropriate. We continuously monitor the effectiveness of our modern slavery prevention efforts through key metrics such as supplier audit results, number of modern slavery-related complaints and corrective actions taken. The effectiveness of these steps continue to be monitored.

Due Diligence

We seek to manage modern slavery risks within our supply chains through proportionate supplier due diligence and contractual safeguards. Depending on the nature of the supplier and the risks associated with the relevant goods or services, these measures may include supplier pre-qualification assessments, contractual commitments to comply with applicable modern slavery legislation, supplier declarations and further enquiries or management visits where appropriate.

Our standard purchasing arrangements and Supplier Code of Conduct are intended to reinforce our expectations of suppliers and encourage appropriate standards throughout their own supply chains. Where concerns are identified, we will consider appropriate action having regard to the nature and seriousness of the issue, which may include seeking corrective action, further investigation or termination of the relevant business relationship.

Monitoring

We take steps to 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.globalslaveryindex.org).

We assess the effectiveness of our approach through management oversight, supplier due diligence, consideration of any concerns raised through our reporting procedures and the review of any identified incidents or corrective actions. We continue to consider opportunities to improve these arrangements.

We also have a dedicated compliance team which includes involvement from the Chairman, General Counsel and Company Secretary.

Training

All directors and senior managers received training at our annual Business Conference. This has historically been very effective at raising the awareness and helps ensure that the delegates understand the importance of the issue of modern slavery and human trafficking. We also carry out enhanced sanctions, KYC and anti-money laundering training and updated internal policies to reflect the associated risks. This training has been provided by the Group's General Counsel and leading international law firms.

This awareness is enhanced through both on the job training and process improvements with the purchasing teams and the on-line training courses that were set-up in previous years.

Further actions and sign-off

During the reporting year, we continued to strengthen our Group compliance framework, including the introduction of a Group-wide Code of Conduct setting out the ethical standards expected of employees and relevant business partners. We have also continued to review opportunities to improve supplier due diligence and compliance arrangements at subsidiary level. Following the review of our process this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

further process improvements at subsidiary level to prevent slavery and human trafficking from occurring in our supply chain.

This statement is made on behalf of Goodwin PLC and its subsidiary companies, including Goodwin International Limited and Goodwin Steel Castings Limited, in accordance with the obligation to make a modern slavery statement under s54(1) of the Act.

This statement will be reviewed and updated annually to reflect the evolving nature of modern slavery risks and the effectiveness of our ongoing efforts.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of Goodwin PLC, Goodwin International Limited and Goodwin Steel Castings Limited in respect of the financial year ended 30 April 2026.

This statement was approved by the respective boards of directors of Goodwin PLC, Goodwin International Limited and Goodwin Steel Castings Limited on 2nd November 2026 and signed by a Goodwin PLC director on their behalf.



Anthony Thomas
Director and General Counsel