

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 2019 to ensure slavery and human trafficking is not taking place in our businesses or our supply chain.

Our business, corporate structure and supply chain

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 24 manufacturing sites, 65 national offices, and 83 regional locations in 37 countries. We have a workforce of more than 3,600 employees and engage with more than 4,000 global suppliers.

Group policies

This year saw the global launch of our corporate Values which emphasize our focus on being a responsible business. We have engaged with our employees worldwide to highlight the role we can all play in ensuring Rotork operates ethically and responsibly.

We have also launched our Employee Code of Conduct (the 'Code') which contains material on Modern Slavery. The Code is intended to raise awareness amongst all staff and empowers them to "Speak Up" if they identify an area of concern.

We have further updated our Whistleblowing Policy, which we have now renamed the Speak Up Policy. It has been translated into the five principle languages used in our business. We work with SafeCall and aim to make reporting as straightforward as possible, recognizing that our staff may be the first to identify an issue. In line with the work we have done in previous years, we continue to deal with all reports efficiently, effectively and consistently.

Modern slavery in our business

Our directors and other senior managers continued to make regular visits to our locations around the world during the year. No potential modern slavery issues were identified at any of our sites. However, we are conscious that we need to guard against complacency and remain diligent in this regard.

Further, our internal auditors have visited 28 sites this year. Our experienced auditors are versed in the kind of indicators which could reveal the presence of modern slavery and know how to report issues should they identify them. We will continue to review how we make sure we are effective in looking for the signs of potential slavery and human trafficking, and how we ensure such behavior does not occur in our business.

Our supply chains

We have established a Global Strategic Sourcing Team, which now allows for consistency in the way we approach our relationships with suppliers.

At our inaugural Supplier Day in September 2019, we paid special attention to the issue of legal compliance, and explained to our Suppliers that we would be relaunching our Supplier Code of Conduct in 2020 to reflect the continuous improvement both Rotork and its Suppliers have made in this area. This revised Supplier Code of Conduct will continue to address Modern Slavery.

Risk assessment and due diligence

We continue to review all of our suppliers and part of this assessment focuses on modern slavery risks. Our initial focus has been on suppliers with enhanced risk profiles, such as the country they are based in and our risk assessment incorporates learnings gained through the supplier survey conducted previously.

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.

Monitoring

During 2017, we implemented a new system for the ongoing online monitoring of third parties against various lists, records and media sources. The strategic suppliers retained following the review process, will be monitored for any ethical issues. Quarterly business reviews, with follow up audits where necessary, have taken place. The reduction in the number of suppliers will make monitoring easier.

We have engaged with an independent intelligence provider to analyse our supply base and identify any issues in our global supply chain.

Legal compliance

We contractually oblige our suppliers to comply with the laws and regulations applicable to them and to meet minimum standards in relation to modern slavery, human rights, anti-bribery and corruption, employment practices, health and safety and the environment. We also expect our suppliers to check that their sub-suppliers comply with the laws and regulations applicable to them and meet the same minimum standards.

The requirements described above are set out in our current Supplier Code of Conduct that we introduced in 2018 and will also be included in our new supplier Code of Conduct for 2020. The terms of purchase that we issued in 2017 were further updated again in 2019 to ensure that they reflect our continuous improvement.

As part of the supply chain strategy, we will continue to put in place long term supply agreements with our strategic suppliers which reference our Supplier Code of Conduct and include rights of audit and other monitoring arrangements.

Training

Our renewed Modern Slavery training course is being rolled out to our procurement teams and others who are involved with our supply chains. In 2020 we will further revisit the training currently on offer and identify the need for audience specific guidance.

The Modern Slavery Act – Transparency in Supply Chain statement

This statement is made on behalf of Rotork plc and its subsidiary companies, including Rotork Controls Limited and Rotork UK Limited, in accordance with the obligation to make a modern slavery statement (Statement) 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.

Kevin Hostetler
Chief Executive Officer
January 2020