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Goodwin PLC

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

This statement is issued by Goodwin PLC and Goodwin International Limited

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.

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.

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, both Goodwin International Limited and Noreva GmbH purchase the majority of their castings from Goodwin Steel Castings Limited. 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.

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 - J. E. Kelly (Non-Executive) - C. A. McNamara (Non-Executive)

Policies

We regularly review and improving our policies including in line with the United Nations Global Compact's ten universal principles. 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.

Transparency is encouraged through whistle blowing awareness and the maintenance of personal visits by management where possible. The extensive restrictions from the coronavirus pandemic have been relaxed in many jurisdictions and as a result, senior executives including the Chairman and Divisional Managing Directors have visited the majority of the Groups operations that are based overseas. 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.

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

As a part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have implemented the following due diligence procedures:

- Reviewed supplier pre-qualification questionnaires, to avoid modern slavery before engaging with new suppliers
- That major suppliers agree to anti-modern slavery provisions in writing
- The introduction of Supplier Codes of Conduct (with supplier declarations) for some subsidiaries where supplier's expressly warrant compliance as part of our standard conditions of purchase and in some cases a specific supplier declaration is provided for critical suppliers
- Suppliers and subsidiaries to have anti modern slavery provisions in their supply chain contracts cascading responsibility down the supply chain. The consequences for suppliers failing to comply with our anti-slavery standards include contract termination
- 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

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.globallslaveryindex.org>).

We also have also introduced 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. During the year, we have carried 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 a leading international law firm.

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

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:

- a) develop a comprehensive Group wide code of conduct 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 our stakeholders; and
- b) 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, in accordance with the obligation to make a modern slavery statement (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 was approved by the Board on 22nd November 2024 and is signed on its behalf by:



Matthew Goodwin
Divisional Managing Director