

## Modern Slavery and Human Trafficking Statement 2022

This statement is made by British Engines Limited pursuant to section 54 of the Modern Slavery Act 2015 (**Act**) as a demonstration of our commitment to ensuring that there is no slavery or human trafficking taking place within the organisation or its supply chains (**Statement**).

### **1. Corporate Structure, Business and Supply Chains**

The British Engines group of companies (**Group**) is a global engineering group. The eight trading businesses design and manufacture technology leading products for, as well as provide services to, a wide range of industries including the renewables, digital, defence, power, nuclear, aerospace, robotics, oil and gas, chemical, marine, construction and agriculture sectors. This Statement is made on behalf of the Group.

All of the UK trading subsidiaries are based in the North East of England and the factories are supported by a network of offices in key locations around the world with manufacturing facilities also located in India. We have offices in 12 countries including America, Australia, South Africa, Singapore, Russia, India, China and also in Europe.

Each company in the Group is largely responsible for its own procurement, albeit there are a limited number of Group services that are procured centrally such as IT hardware, software and support services.

The supply chains for each of the businesses include raw materials, bought out components, other manufactured goods and consumables together with any third party services required from time to time such as consultants and professional services.

As at the date of this Statement, CMP Products Limited (**CMP**) is required to make a statement in accordance with section 54(1) of the Act. This Statement reflects the activities undertaken by and British Engines Limited along with all other trading companies within the Group.

Further information about the activities of our Group and the companies within it can be found on our website at: [www.britishengines.co.uk](http://www.britishengines.co.uk).

### **2. Our Policies in relation to Slavery and Human Trafficking**

The Group is committed to the highest standards of ethical conduct and integrity in its business activities and this includes ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

The British Engines Group Business and Ethics Policy (**Ethics Policy**) is the primary behaviour guide for all employees. This incorporates the principles that the Group and its associated persons should always abide by, including ensuring transparency in each business and tackling modern slavery throughout the supply chains.

Since the date of the Modern Slavery and Human Trafficking Statement 2021, we have adopted a policy specifically relating to slavery and human trafficking (**Anti-Slavery Policy**) which has been communicated to all employees. The Anti-Slavery Policy and the Ethics Policy (together **Policies**), our business practices and this Statement reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Policies are available on the British Engines website at [www.britishengines.co.uk/about-us/compliance](http://www.britishengines.co.uk/about-us/compliance).

The Policies require employees and associates to notify any concerns about breaches of the Policies or any suspicions about modern slavery taking place. We also have a clear whistleblowing policy that is published on our Group intranet.

### **3. Due Diligence processes in relation to Slavery and Human Trafficking**

Procurement teams throughout the Group are aware of the need to consider ethical compliance when developing and maintaining supplier relationships.

Over the next 12 months, we are aiming to ensure that each of our trading companies has a due diligence process and ongoing compliance assessment for suppliers that is appropriate for the nature of its supply chain, the territories it operates in and the associated risks.

Supplier responses to our due diligence questionnaires are taken into consideration when selecting suppliers and we make any concerns known to suppliers. Where necessary we will cease to engage with any supplier who is unable to provide adequate responses to our due diligence enquiries.

Our standard terms and conditions require suppliers to confirm adherence to our policies and we reserve the right to terminate our relationship with a supplier in the event of a failure to comply.

### **4. Training**

All new employees are required to complete a training module relating to modern slavery and human trafficking as part of their induction process. Over the last 12 months, all procurement teams and senior managers have also been required to complete the training module. Our HR team continues to monitor compliance with business policies across our business and to manage, with the Company Secretary, any concerns that may arise.

### **5. Effectiveness**

We have a zero tolerance approach to slavery and human trafficking. We have not identified any indications that it occurs in our supply chains and we will continue to work with our suppliers to ensure that this remains the case.

This Statement constitutes our Group slavery and human trafficking statement for the financial year ending 30 October 2021.

### **Approval**

The board of directors of British Engines Limited approved this updated statement on 24 March 2022.



**Alexander Lamb**

**Chair**

**British Engines Limited**

Dated: 24 March 2022