



# Modern Slavery Statement 2025

## Introduction

Rotork plc, and its subsidiary companies (together, "Rotork" and throughout this Statement "our" and "we"), recognise our responsibility as a global engineering group, to ensure that slavery and human trafficking is not occurring in any part of our business or supply chain. Until such time as these risks have been eradicated globally, we are committed to working with our partners, suppliers and other interested parties to identify and mitigate modern slavery risks within our operations, business and our supply chain.

This Statement sets out the steps we have taken during the financial year ended 31 December 2025 to ensure slavery and human trafficking is not taking place in our businesses or our supply chain. It is intended to provide an update on our progress with strengthening our modern slavery risk management framework and explain the steps we aim to take in the coming year.

## Our Business and Supply Chain

### Our business

Rotork is a market-leading global provider of mission-critical intelligent flow control and instrumentation solutions for oil & gas, water and wastewater, power, chemical process, and industrial applications. We help customers around the world improve efficiency, reduce emissions, minimise their environmental impact and assure safety.

We are headquartered in Bath, United Kingdom with 68 locations globally and serve over 140 countries through a global service network. We have a workforce of over 3500 employees.

### Our supply chain

Rotork's supply chain is mapped globally, by the Global Supply Chain function. Suppliers are classified as either **Direct Materials suppliers** (those providing components used in our products) or **Indirect Goods & Services suppliers** (those providing general goods and support services). We further group suppliers by the category of product or service they deliver. We assess the significance of suppliers based on factors such as spend and operational criticality which determines the level of engagement, oversight and due diligence applied.

Rotork regularly reviews and updates its mapping of tier-1 suppliers, defined as those with whom we have a direct contractual relationship. Tier-2 and lower-tier entities represent the suppliers further down the chain that provide goods or services to our tier-1 suppliers. For critical goods such as castings and electronic components, we extend this mapping to include the relevant sub-tier suppliers to increase visibility of foundries, machine shops, plastic manufacturers and other key contributors. For certain specialised or proprietary components, Rotork specifies approved manufacturers. In these cases, tier 1 suppliers are required to purchase these components brand-new through authorised distribution channels.

This structured approach strengthens our ability to identify, assess, and mitigate risks related to modern slavery and human trafficking within our supply chain.

In 2025, Rotork sourced goods and services from approximately 6,000 suppliers worldwide. Our Global Supply Chain team co-ordinates commodity-specific strategies and brings consistency to our Supplier Relationship Management processes with the goal of transitioning to a supply base that enables us to be responsive to our customers while maintaining healthy inventory and meeting high ethical and technical standards.

### **Our Values and Policies**

Rotork has earned a reputation for integrity, fair dealing, and ethical behaviour. We are determined to preserve that reputation and ensure that, wherever we do business or operate around the world, we exert a positive influence. Acting ethically and in line with our values is rooted in our culture and reflected in our Code of Conduct, which is published on our external website. We expect everyone working for us, and with us, to follow the Code of Conduct and act with integrity at all times.

The **Code of Conduct** includes guidance on the identification of potential modern slavery risks and empowers employees to “Speak Up” if they identify any area of concern, including concerns relating to potential modern slavery risks.

Our **Modern Slavery Policy** reflects our commitment to implementing and enforcing effective systems and controls. The policy applies to all employees, is available on our intranet and is translated into six languages. To raise awareness, it outlines key indicators of modern slavery and higher risk activities, such as in our supply chains and outsourced activities, and recruitment through staffing agencies. The policy also contains key performance indicators to assess the effectiveness of our control measures.

Rotork has an open and transparent culture underpinned by our **Speak Up Policy**. The policy encourages colleagues to report suspected wrongdoing as soon as possible and without fear of detrimental treatment as a result of raising a concern. We offer a **range of channels** for raising concerns. Our policy encourages colleagues to contact their line managers, our Head of Ethics and Compliance, our Chief Human Resources and Sustainability Officer or our Group General Counsel & Company Secretary. We also offer an independent, global, and multi-lingual external reporting service managed by Safecall. This service allows concerns to be raised anonymously if preferred. It is available to employees, external stakeholders (such as suppliers) and the public and is operated 24 hours a day, 7 days a week. Reports can be made to a local freephone number or submitted via Safecall’s website. All reports we receive are dealt with efficiently, effectively, and consistently. Our Speak Up poster is exhibited in all our offices and facilities and highlights modern slavery as a specific area of concern to look out for and report.

Our mandatory **compliance certification process**, launched every year in January, requires all Rotork employees and contractors to confirm that they have adhered to our Code of Conduct and Compliance policies during the preceding year (including our Modern Slavery Policy), and have completed all mandatory training.

Our standard contract terms require our suppliers to adhere to our **Supplier Code of Conduct**, which was refreshed in early 2025 to take account of best-practice benchmarking and to align it more closely with the Rotork Code of Conduct. The Supplier Code of Conduct sets out our zero-tolerance policy on compulsory or forced labour, or any other form of slavery or servitude. It requires our suppliers to meet minimum standards in relation to human rights, anti-bribery and corruption, employment

practices, health and safety and the environment. Our suppliers are periodically asked to review and confirm compliance with the Supplier Code of Conduct and their responses verified as part of our audit programme (described below). The Supplier Code of Conduct also sets out our expectation that suppliers will work diligently to ensure that their own supply chains meet similar standards.

## Assessment and Management of Modern Slavery Risk

### Our operations

As part of Rotork's routine and non-routine visits to and audits of our suppliers, our Supplier Quality Engineers, Category Managers, regional and local Supply Chain staff as well as the wider Rotork leadership team remain vigilant regarding indications of any risk related to modern slavery and human trafficking.

Rotork uses **recruitment agencies** from time to time to source temporary and permanent staff. This increases the risk that Rotork could be unknowingly exposed to modern slavery risks. To address this, clauses on modern slavery and adherence to our Supplier Code of Conduct are included in our recruitment agency contracts and only those who have signed these terms can be used to source staff. We also work closely with our recruitment agency partners to ensure they adhere to Rotork's standards.

As part of Rotork's **mergers and acquisitions** integration activities, we seek to ensure that newly acquired businesses are brought into alignment with our broader Ethics & Compliance expectations. This includes introducing key policies and raising awareness of our standards on issues such as modern slavery and human rights. Taking this approach helps to promote a consistent culture of ethical conduct across the group and supports our ongoing commitment to identifying and mitigating modern slavery risks within all parts of our business. Following the acquisition of NOAH, employees received training on the Rotork Code of Conduct in March 2025, which included a module on Modern Slavery and Human Trafficking, including how to recognise and prevent it.

### Our supply chain

We conduct **risk assessments** on our suppliers to determine their risk category, and consequently, the appropriate level of due diligence to be applied. Our risk-based supplier assessment model ensures that risk scores are developed through a combination of factors, including scores relating to their country of operation, with country-based index scores for human freedom, child labour, corruption and health and safety, drawing on internationally-recognised indices provided by organisations such as the International Labour Organization and Transparency International to differentiate risk by country. The model covers human freedom, prevalence of child labour, bribery and corruption, health and safety and the commodity provided. The process also documents our escalation procedures for any concerns identified.

In 2025 we reviewed and updated the risk scoring element related to the type of goods or services procured and how we prioritise supplier assessments during the triage and assessment process. As a result, we have increased diligence on higher-risk categories within our indirect supply chain across all jurisdictions.

Our supplier **selection and approval procedures** consider several risk areas, including modern slavery, and human rights issues more generally. We use a third-party software platform to support management of supplier self-assessment questionnaires. Among other things, these questionnaires require suppliers to confirm whether they are familiar with our Supplier Code of Conduct and have

relevant policies of their own in place, and include questions about their workforce, and how they ensure certain standards are met in relation to their workers. Additionally, we ask our key suppliers to provide more detailed information, to understand more specifically the measures these suppliers have implemented to prevent modern slavery. Where appropriate, the selection process may involve a site visit.

In 2025 we enhanced our internal processes related to our **Indirect Procurement Policy** and communicated these globally to reinforce that procurement activity within the indirect supply chain is subject to our established supplier on-boarding controls and our purchase requisition procedures.

As part of **ongoing monitoring** of our supplier relationships, we continue to assess the slavery and human trafficking risks arising from relationships through regular as well as incident-driven supplier audits. We 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, or ceasing to work with a supplier altogether. Throughout the year, our Global Supply Chain and factory teams conduct supplier site visits to select and qualify new suppliers or re-evaluate existing suppliers. In 2025, none of our site visits or remote reviews identified modern slavery concerns.

As part of the ESG (environmental, social and governance) **deep dive project** we commenced in 2023, we commenced dedicated programme of audits on suppliers in China in 2025, which will continue in 2026. The audits include site visits to suppliers that we would not routinely visit for other reasons. An important part of this project is to identify whether compulsory or forced labour, or any other form of slavery or servitude is occurring, and to address any concerns that might be identified. We will continue to focus on suppliers located in higher risk countries, and high-risk services in all countries in 2026. Any modern slavery concerns identified will be addressed appropriately.

During 2025 we held a **Supplier conference** at our Suzhou facility for key suppliers in the Asia-Pacific region. Rotork senior leaders presented various topics to the group, including an overview of our updated Supplier Code of Conduct. This was designed to reiterate our commitment to the values set out in the Supplier Code of Conduct and set expectations about how we will work together to continually improve Modern Slavery and ESG controls in our supply chain.

### **Key Performance Indicators & Monitoring**

We have developed key performance indicators (KPIs) to monitor the risk-based actions we are taking and assess the effectiveness of our modern slavery-related control measures. The KPIs are reviewed annually and updated as appropriate.

### **Training and Awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff.

Employee training and awareness is one of the core elements of our Compliance programme and continued to be an area of significant focus in 2025. We rolled out training on our Code of Conduct to all digital employees via our Learning Management System (“LMS”) during Q1 2025. The training includes a module on Modern Slavery and Human Trafficking, including how to recognise and prevent it, and this had a completion rate of over 99% as of 31 December 2025. Our non-digital colleagues also received Code of Conduct training (including how to spot modern slavery) which was delivered via classroom sessions during Q1 2025.

We also have a mandatory induction programme for all new hires with access to the LMS, which contains the module on modern slavery. The course is designed to build knowledge of, and capability to manage, risks and covers:

- What modern slavery is, its forms and key indicators;
- How to identify and respond to modern slavery risks;
- Key risk areas; and
- How to report concerns.

The course also provides targeted content for members of the Rotork Management Board and for our Procurement and Human Resources functions as these teams may be more likely to encounter potential modern slavery risks and therefore need more bespoke training content to help raise their awareness as they perform their roles.

### **Effectiveness, Progress and Year Ahead**

Rotork continually looks for ways to support the promotion of human rights within our operations and our sphere of influence. We respect internationally recognised human rights, as set out in the United Nations International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. These cover freedom of association, the abolition of forced labour, equality and the elimination of child labour. We continue to engage in risk assessment, business reviews and audits of our suppliers as appropriate.

In 2026, we will continue to strengthen the measures we have in place to identify and address modern slavery and human trafficking risks. Following the completion of the Supplier Code of Conduct update in 2025, our focus will shift toward embedding these standards more deeply across the business. This includes continuing to provide training on the updated Code to relevant stakeholders, maintaining our programme of online Modern Slavery, Code of Conduct and Speak Up modules for new hires, and ensuring that all employees complete annual declarations confirming adherence to our Code and associated policies. We will also continue to refine our supplier risk analysis, conduct supplier audits based on onboarding, periodic review or identified risk, progress our audit work, and monitor key performance indicators to assess the effectiveness of our controls. A particular area of focus for 2026 will be further enhancing the induction process for new colleagues, both digital and non-digital, to ensure consistent awareness of modern slavery risks and alignment with our ethical expectations from the outset.

### **The Modern Slavery Act**

This statement is made on behalf of Rotork plc and its subsidiary companies, including Rotork Controls Limited and Rotork UK Limited, 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.



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Kiet Huynh  
Chief Executive Officer  
March 2026