

**Slavery and Human Trafficking Statement 2025**

**Applies to British Engines Holdings Limited, British Engines Limited, British Engines (UK) Limited, CMP Products Limited, BEL Valves Limited, BEL Engineering (UK) Limited, Rotary Power Ltd., Michell Bearings Limited, Stephenson Gobin Limited, Stadium Export Services Limited and Tyne Pressure Testing Limited**

**(British Engines Group)**

**1. Introduction**

This statement (**Statement**) is made by British Engines Holdings Limited pursuant to section 54 of the Modern Slavery Act 2015 (**Act**) on behalf of the British Engines Group as a demonstration of our commitment to ensuring that all business dealings are carried out in full compliance with all applicable laws. This includes our commitment to ensuring that there is no slavery or human trafficking taking place within the Group companies or their supply chains

**2. Corporate Structure, Business and Supply Chains**

The Group is a global engineering group comprising eight trading businesses, namely CMP Products Limited (**CMP**), BEL Valves Limited, BEL Engineering (UK) Limited, Rotary Power Ltd., Michell Bearings Limited, Stephenson Gobin Limited, Stadium Export Services Limited and Tyne Pressure Testing Limited. These 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.

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 the USA, Australia, South Africa, Singapore, 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, energy and other 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 is required to make a statement in accordance with section 54(1) of the Act. This Statement reflects the activities undertaken by British Engines Holdings Limited and CMP 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/about-us/group-companies/](http://www.britishengines.co.uk/about-us/group-companies/).

**3. Our Policies in relation to Slavery and Human Trafficking**

The Group is committed to creating and providing a non-discriminatory and respectful working environment for all colleagues, to ensure equal opportunity for all in recruiting, developing and promoting. Our recruitment process is designed to ensure that all prospective employees are legally

entitled to work in the UK and, where appropriate for the role applied for, Disclosure and Barring Service checks are completed.

The Group has an anti-slavery and human trafficking policy in place (**Anti-Slavery Policy**) which is accessible to employees. The British Engines Group Business and Ethics Policy (**Ethics Policy**) is the primary behaviour guide for all employees. We expect all colleagues to behave with honesty, integrity and respect towards all stakeholders in our businesses. The Ethics Policy 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.

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 either in our companies or 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 available to all employees.

#### **4. Due Diligence processes and supply chain standards**

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

Procurement teams throughout the Group are aware of the need to consider ethical compliance when developing and maintaining supplier relationships. Each of our trading companies has a due diligence process 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 if any concerns were to arise, these would be made known to suppliers. We will cease to engage with any supplier who is unable to provide adequate responses to our due diligence enquiries where necessary.

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.

#### **5. Training**

Our compliance related training modules include training on modern slavery and human trafficking. It is compulsory for all new employees to complete this training as part of their induction. We employ over 1,200 across the Group and we regularly review the requirements for employees to complete refresher training using a risk-based approach. All employees have a responsibility to understand and comply with the policies and our managers are responsible for ensuring that their teams are trained and comply with the policies. Our HR team ensures that appropriate training modules are available, that completion rates are monitored and managed, with the Company Secretary, any concerns that may arise.

#### **6. Effectiveness**

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

This Statement constitutes our Group slavery and human trafficking statement for the financial year ending 31 October 2024.

**Approval**

The board of directors of British Engines Holdings Limited approved this statement on 24 January 2025.

A handwritten signature in black ink, appearing to read 'Alexander Lamb', written in a cursive style.

**Alexander Lamb**

**British Engines Holdings Limited**

Dated: 24 January 2025

