

## MODERN SLAVERY STATEMENT

This statement is published pursuant to section 54 of the UK Modern Slavery Act 2015 and is Smiths Group plc's modern slavery and human trafficking statement for FY2024. It sets out the steps taken by Smiths Group plc and its subsidiaries<sup>1</sup> to address the risk of modern slavery and human trafficking in its business and supply chains. References to "Smiths" are to Smiths Group as described below.

Smiths Group plc is headquartered in the UK and listed on the London Stock Exchange. Our business is organised into four divisions: John Crane, Smiths Detection, Smiths Interconnect and Flex-Tek. Our products and solutions serve four main global markets: General Industrial, Safety & Defence, Energy and Space & Aerospace, and our products and services reach around 200 countries. We employ more than 15,750 people in more than 50 countries. More information about Smiths business can be found in our [Annual Report](#).

## OUR BUSINESS

Smiths is committed to doing business responsibly and sustainably. This commitment and the steps being taken to meet it are described in our [Sustainability at Smiths report](#). As explained there, we believe in doing business responsibly, the right way every day and turning our purpose and Values into behaviour and practical action that mobilises Smiths strengths to improve our world. This includes responsibly managing any actual and potential human rights impacts in our business and in our supply chains.

We are committed to conducting business ethically everywhere we operate, and our suppliers must do the same. Our employees and business partners are expected to report concerns using the appropriate channels, including our Speak Out hotline (described below), and management is required to act promptly to address any issues that arise. Smiths recognises its social responsibility and the role it can play in ensuring that its business partners operate within the law and in line with Smiths expectations. Smiths is committed to continue driving improvements to its modern slavery compliance programme across its businesses.

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<sup>1</sup> These include Smiths Group plc's subsidiaries worldwide, including all relevant Smiths Group companies according to the requirements of the UK Modern Slavery Act (John Crane UK Limited, Smiths Business Information Services Limited, Smiths Detection United Kingdom Limited, and Smiths Detection Watford Limited).

## MANUFACTURING AND SUPPLY CHAIN

Each Smiths division is responsible for its own manufacturing and for its supply chain. In total, the divisions have manufacturing operations in 26 countries<sup>2</sup>. Manufacturing processes vary by division. They include the assembly of purchased components, the machining and forming of metallic products, additive manufacturing, and the extrusion of specialty materials.

Supply chains are mostly local or regional rather than global. In total, Smiths has many suppliers around the world with whom it spends approximately £1.2bn annually. Over 95% of the divisions' direct goods spend comes from 20 countries<sup>3</sup>. Smiths divisions are supported by a global Group Operations team, which is responsible for purchasing certain goods and services centrally, and for identifying opportunities for driving best practices and consistency in procurement and supply chain management across the divisions.

Smiths supply chains include those related to the production and sale of its products and services, including aftermarket services to maintain and repair its products. Other important supply chains include catering, cleaning, maintenance, and security services procured by Smiths sites, and those supply chains related to the recruitment and sourcing of staff.

## OUR POLICIES, TRAINING AND PROGRAMME OVERSIGHT

**Policies:** Smiths commitment to human rights and responsibly managing the risks of human trafficking and modern slavery in our supply chains are set out in our [Code of Business Ethics](#), [Supplier Code](#), [Human Rights Policy](#), [Responsible Minerals Sourcing Policy](#) and Human Rights Supply Chain Due Diligence Policy. These policies are managed by Smiths Ethics & Compliance team. Smiths also has in place supplier due diligence processes and procedures. Supplier contracts include clauses binding suppliers to comply with human rights and other applicable laws and require them to honour Smiths Supplier Code in the way they conduct their business.

**Training and awareness:** Smiths employees are required to take a comprehensive set of ethics and compliance related training. This includes repeat awareness training on modern slavery and labour standards assurance. New employees are trained as part of their orientation process. In FY2024, Smiths introduced an updated modern slavery training module, tailored to our businesses. Smiths training suite helps staff identify modern slavery red flags and is reinforced through communications. The Ethics & Compliance team conducts ethics and compliance workshops for middle and senior managers, which also cover modern slavery and associated red flags.

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<sup>2</sup> US, Mexico, Canada, UK, Ireland, Italy, Germany, United Arab Emirates, South Africa, Czech Republic, India, Finland, Sweden, France, Spain, Japan, South Korea, Singapore, Malaysia, Russia, China, Australia, New Zealand, Brazil, The Netherlands and Costa Rica

<sup>3</sup> United States, Germany, China, United Kingdom, France, Italy, Japan, Czech Republic, Taiwan - Province of China, Switzerland, Canada, The Netherlands, South Korea, Finland, Mexico, Russia, Singapore and Brazil

In FY2024, workshops were conducted with colleagues located in India (including Delhi, Pune & Bangalore) and throughout Latin America and the Caribbean.

We communicate the need to report modern slavery concerns through posters at our sites.

**Oversight:** Procurement related modern slavery and human rights risks and controls are monitored by a working group comprised of Procurement leadership and the Ethics & Compliance team. A second working group (made up of colleagues in HR and the Ethics & Compliance team) is focused on risks associated with modern slavery and labour standards arising from Smiths own operations.

Anti-modern slavery initiatives are discussed with the Smiths Business Ethics Council (a cross divisional, cross functional group of senior leaders which meets quarterly). Ethics & Compliance regularly reports on these programmes and discusses emerging issues with the Smiths Executive Committee and the Audit & Risk Committee of the Smiths Board.

## ASSESSING AND MANAGING OUR MODERN SLAVERY RISK

As stated, Smiths has operations across the world, employing more than 15,750 people in approximately 50 countries. Approximately 40% of our workforce is production-based. In FY2024 we employed approximately 900 contract workers, who were sourced through third party agencies. Occasionally these contract workers include migrant workers. While we do not employ anyone under the age of 16, Smiths occasionally employees people between 16 and 18 years of age (there were 6 such employees in 2024, all of whom were apprentices or interns). Smiths takes active steps to ensure it complies with UN Human Rights conventions and International Labour Organization conventions as they relate to the employment of children.

Our suppliers are spread across the world, providing us with materials, components, products and services. Some of our products contain raw materials regulated through conflict minerals laws and regulations and products associated with modern slavery and human rights risks, such as electronic components. Our suppliers employ a significant number of people, including labour potentially exposed to the risks of modern slavery.

**Smiths own operations:** We recognise that human rights violations can occur anywhere. To prioritise activities, we have identified sites that we consider higher risk based on labour force (particularly contract, temporary and migrant labour) and location (primarily using the Global Slavery Index<sup>4</sup> and the Trafficking in Persons Report<sup>5</sup> (TIPR)) to guide the risk assessment.

In FY2024 we conducted targeted risk reviews on our sites in Colombia, Venezuela, Puerto Rico, and South Africa. No major issues were identified; however, we recognise the need to continue monitoring the risks and effectiveness of our controls.

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<sup>4</sup> Walk Free Foundation

<sup>5</sup> Published by the US Department of State

**Suppliers:** To prioritise activities, we categorise suppliers by risk based on spend, location, and industry (using the Global Slavery Index and the *Trafficking in People Report* (TIPR) and other reports). Our risk assessment and processes still currently focus on Tier 1 suppliers. Due diligence is conducted on these suppliers to assess, among other things (including capability, quality and financial stability), modern slavery and human rights risks. There is a separate due diligence process to vet recruitment agencies.

In FY2024 we took the following steps to improve our supplier modern slavery risk management:

- **Adopted EcoVadis to provide a comprehensive, data driven assessment of supplier ESG risk, including the risk of modern slavery.** In addition to evaluating and rating suppliers on the robustness of their environmental and governance programs, EcoVadis measures a given supplier's labour and human rights risks based on their industry, country of operation, policies, and procedures. With data from EcoVadis, Smiths will be able to track its high-risk suppliers, develop and monitor action plans, and refine its ESG and human rights programs.
- **Introduced a Supplier Code of Conduct training module.** The course highlights what it means to doing the business the right way means to Smiths: safely, sustainably, and to the highest business and ethical. This includes monitoring for and taken steps to prevent modern slavery within the supply chain. The course will be mandatory for all high-risk suppliers.
- **Introduced an updated Anti Modern-Slavery training module for employees.** This mandatory course educates employees on where modern slavery risks might exist within our business or value chains, how to identify modern slavery red flags, and what to do if they are spotted. Employees will be required to take the training every two years.
- **The Ethics & Compliance team held ethics and compliance Workshop with colleagues located in India and throughout Latin America and the Caribbean.** This was an opportunity to discuss in more detail ethics and compliance topics, including modern slavery and human rights risks faced by Smiths businesses in the region, and Smiths approach to managing those risks.
- **Targeted site assessments were conducted** in Colombia, Venezuela, Puerto Rico, and South Africa.
- **Based on our Modern Slavery Risk Assessment, we conducted audits of recruitment agents and labour suppliers used by Smiths businesses in India.** No material issues were identified. However, there were observations for which there will be follow up. For example, the work facilities provided to employees of one of Smiths labour agencies, while safe, required improvements to bring it up to Smiths standards.

**Reporting Concerns:** Smiths operates a global reporting hotline ('Speak Out' hotline), which is managed independently by Smiths Ethics & Compliance office. It enables anyone to report (anonymously, if preferred) by telephone, email or online any breach of our Code of Business Ethics or seek guidance about Smiths ethics policies.

All reports come to the Smiths Ethics & Compliance team and are handled confidentially. Smiths Ethics & Compliance team is responsible for ensuring that reports are promptly and thoroughly investigated. We have a regular cadence of communications (including from Smiths leadership) to encourage reporting of concerns.

Our employee survey, the 'Ethics Pulse', runs at regular intervals throughout the year, enabling us to monitor, among other things, whether staff know how to use Speak Out, and whether they feel safe to Speak Out (see Smiths [Sustainability at Smiths report](#)). Smiths Supplier Code also encourages suppliers and their staff to use our Speak Out hotline.

Data from our Speak Out system provides KPIs used to monitor ethics performance (including tackling modern slavery). We monitor the number and nature of cases reported regionally and by site, substantiation rates, anonymity rates, and disciplinary action. The 'Ethics Pulse' survey monitors colleagues' perception of Smiths ethics (see our Sustainability at Smiths report), and we monitor audit findings (both internal and external audits). In FY2024 we received through our Speak Out hotline 283 reports covering a broad array of concerns. Our E&C pulse survey indicates strong trust in the system (95% of colleagues saying they know how to Speak Out, 91% of colleagues believing it is safe to speak out, and 97% of colleagues saying that if they would report unethical conduct if they saw it).

There are more details included in our [Sustainability at Smiths report](#).

## ACTIVITIES IN FY2025

The risks of modern slavery and human rights issues in Smiths businesses are not static – we recognise the importance of remaining vigilant to ensure we spot and react to emerging risks. Our understanding of how our businesses potentially impact human rights will continue to develop.

In FY2025, we will continue to focus on ensuring we identify our risks, that they are understood across the company, that we have appropriate controls in place to mitigate them, and that the controls are effective.

In FY2025 we plan to do the following:

- Enroll Smiths top 150 suppliers, by spend, into EcoVadis and, where appropriate, develop action plans to improve supplier compliance and resilience.
- Conduct investigation workshops with our HR colleagues, to further develop modern slavery identification and mitigation skill across the business
- Conduct Ethics & Compliance workshops (which include discussing modern slavery and human rights risks) in China, Canada, Mexico and South Korea.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of Smiths Group plc and its subsidiaries for the financial year ending 31 July 2024. It has been approved by the Board of Directors of Smiths Group plc on 18 September 2024 and is signed on behalf of the Board by its Chief Executive Officer.*



**Roland Carter**  
CEO Smiths Group plc  
18 September, 2024