



UK Modern  
Slavery Act  
Financial Year Ended 30 Sep 2018

# Gilbert Gilkes & Gordon Ltd UK Modern Slavery Act

This statement is made in accordance with the requirements of Clause 54 of the UK Modern Slavery Act 2015.

Gilbert Gilkes & Gordon are committed to conducting business responsibly and to maintaining and improving our systems and processes to prevent slavery and human trafficking in our organisation and supply chain.

## Company Overview

Gilkes are a global supplier to the Small Hydropower and High Horse Power Diesel Engine markets. We employ 200 skilled people and have exported to over 85 countries in our revered 160 year old history. Whilst large enough to have the technical and engineering competence needed to be one of the world's leading brands, we are small enough to remain agile and responsive to ever changing markets and customer demands.

Our principal operating site is based in Kendal, Cumbria. We also have Sales offices in Japan and North America as well as a manufacturing facility based in Texas.

## Policies Related to Modern Slavery

We are committed to acting ethically and with integrity in all our business relationships and adhering to our core values and principles of respecting and protecting human rights.

Our [Code of Conduct](#) establishes the minimum standards of behaviour that all Gilkes employees are expected to value and adhere to. It sets a moral compass for our employees to ensure that when faced with any issue or question they always do the right thing.

Our [Whistle Blowing](#) policy enables employees, customers, suppliers and other stakeholders to raise concerns about compliance violations. Reports can be made anonymously. Currently our whistle blowing policy does not mention specifically modern slavery or human trafficking and this will be added this year.

## Procurement & Supply Chain

During 2018 we spent £20m with around 650 suppliers and partners, predominantly located in the UK and Europe, and we recognise the role they play in supporting responsible business practices. Purchases vary in complexity from raw materials such as cast iron castings for pump housings right through to bespoke major items such as synchronous generators for hydro-electric turbines.

Our [Supplier Handbook](#) defines our expectations of suppliers and the treatment of their employees; showing them dignity and respect and ensuring their health and safety but does not mention, specifically, modern slavery and human trafficking. Our supplier handbook will be updated during 2019 to reflect this.

## Risk Management

Risk is discussed regularly during monthly Management Business Review meetings at which the Senior Team reviews the principal risks that could threaten our future performance, solvency, liquidity or sustainability. Such risks are assessed on the likelihood and impact of occurrence and actions are developed to manage and mitigate these.

The executive leadership team also reviews principal risks as part of its annual strategic review process.

## Effectiveness

Key suppliers are assessed regularly as part of our Supplier Development process. This involves an on-site audit and progress is monitored against mutually agreed plans. If a supplier's risk increases, or gaps in performance are highlighted, actions are put in place to mitigate these.

**Staff Training**

Our executive leadership team has been fully briefed on the Modern Slavery Act 2015.

During 2019, supplier facing staff will undergo training to raise awareness of the risks associated with human trafficking and modern slavery in our supply chains. Part of the training will include how to respond to an incident of modern slavery.

**This statement was approved by the Board of Directors of Gilbert Gilkes & Gordon Ltd on 06 March 2019.**



**Andy Poole**

Chief Executive Officer

06 March 2019