



# Modern Slavery Statement 2025

Financial Year Ended 30 Sep 2024

Gilbert Gilkes & Gordon Ltd Modern Slavery Statement 2025

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

Gilbert Gilkes & Gordon are fully committed to conducting business ethically and with integrity. We uphold our core values by promoting respect for human rights and taking a firm stance against modern slavery and human trafficking in any form.

## 1. Organisational Structure

Gilkes is a global supplier serving both the Small Hydropower and High Horsepower Diesel Engine markets. With a proud heritage spanning 170 years, we have exported to over 85 countries and currently employ 155 highly skilled professionals.

We are large enough to possess the technical expertise and engineering capabilities of a world-class brand, yet small enough to remain agile and responsive to the evolving needs of our customers and markets.

Our headquarters and principal operations are based in Kendal, Cumbria, with an additional manufacturing facility located in Houston, USA.

## 2. Governance & Leadership

- **Board Oversight**  
The Board of Directors oversees our modern slavery risks and has appointed an Executive Sponsor to report on this.
- **Executive Sponsor**  
The Chief Executive Officer champions the organisation's anti-slavery initiatives.

## 3. Policy Framework

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.

- **Modern Slavery & Human Trafficking Policy**  
This policy outlines the principles and actions we take to identify and prevent slavery and trafficking within our organisation and supply chains.
- **Recruitment Policy**  
Our recruitment processes include thorough eligibility checks for all new hires to ensure that no individual is employed against their will or subjected to forced labour.
- **Code of Conduct**  
Our Code of Conduct sets out clear expectations for behaviour across the company, acting as a moral compass to help employees consistently make ethical decisions.
- **Whistleblowing Policy**  
We provide a safe and confidential channel for employees, suppliers, customers, and stakeholders to report concerns, including those related to modern slavery or human trafficking.

#### 4. Training & Awareness

- **Staff Training**

In addition to awareness training for the Procurement team and other supplier-facing employees, we also prioritise training in risk assessment. This helps to enhance the effectiveness of supplier visits and audits, enabling staff to identify and address potential modern slavery risks more effectively.

- **Supplier Education**

Our Supplier Handbook clearly communicates our expectations regarding ethical conduct and the fair treatment of employees throughout our supply chain.

#### 5. Mapping & Visibility

- **Supply Chain Mapping**

Gilkes is aware that modern slavery risks vary according to both country and industrial sectors and/or products prevalent in that country. Gilkes has identified all of its T1 suppliers of materials as well as sub-contractors.

- **Country & Sector Risk Analysis**

Our supply base is primarily located in the UK and Europe—regions where the risk of modern slavery is generally low. Our procurement ranges from basic raw materials i.e. iron castings, to highly engineered components like synchronous generators. While we assess our supply chain risk to be relatively low, we understand the importance of maintaining vigilance and taking appropriate preventative measures.

#### 6. Risk Management & Due Diligence

It is important to us that we work with a supply chain that share our values, and we recognise the role our suppliers play in supporting responsible and ethical business practices.

- **Supplier Audits**

We maintain structured and ongoing assessments to identify modern slavery risks across our operations and supply chain through regular on-site audits of supplier facilities.

- **Supplier Selection**

Gilkes operates a rigorous supplier selection and approval process.

- **Supplier Development**

We work closely with our suppliers on a one-to-one basis to improve their quality, delivery as well as raise awareness about modern slavery.

#### 7. Policy Effectiveness

Performance indicators play a crucial role in enhancing business performance and guiding operational focus. To strengthen our approach to ethical sourcing and modern slavery prevention, Gilkes has established specific goals and key performance indicators (KPIs).

| Goals | Description  |
|-------|--|
| One   | Development of a formal risk assessment process within our procurement procedure that considers the risk of modern slavery |
| Two   | Provide training to all supplier-facing employees to raise awareness of the risk of modern slavery in supply chains        |

|       |   |
|-------|---|
| Three | Perform modern slavery risk assessments on top 15 key suppliers |
|-------|---|

| KPIs | Description  |
|------|--|
| One  | Number of supplier risk assessments conducted in fiscal year |

**This statement was approved by the Board of Gilbert Gilkes & Gordon Ltd on 25<sup>th</sup> July 2025**



**Andy Poole** MBA  
Chief Executive Officer

25<sup>th</sup> July 2025