



# Modern Slavery Statement 2024

Financial Year Ended 30 Sep 2023

Gilbert Gilkes & Gordon Ltd Modern Slavery Statement 2024

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 from within both our organisation and our supply chain.

### **Company Structure**

Gilkes are a global supplier to the Small Hydropower and High Horsepower Diesel Engine markets. We currently employ 165 highly skilled people and have exported to over 85 countries in our revered 168 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 and headquarters are based in Kendal, Cumbria. We have a manufacturing facility based in Houston, USA as well as a sales office in Tokyo, Japan.

### **Policies Related to Modern Slavery & Human Trafficking**

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 [Modern Slavery & Human Trafficking](#) policy sets out the guiding principles & measures taken by the company to tackle slavery & human trafficking in our organisation & our supply chains.

Our [Recruitment](#) policy ensures we conduct eligibility to work in the UK checks for all new employees to safeguard against human trafficking or individuals being forced to work against their will.

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 including modern slavery and human trafficking.

### **Due Diligence**

We have ongoing formal assessments in place to recognise and mitigate any potential modern slavery risks in our supply chains including:

- Supplier selection & approval
- Supplier development
- Regular audits at supplier facilities

### **Supply Chain & Risk Management**

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. Gilkes is aware that modern slavery risks vary according to both country and industrial sectors and/or products prevalent in that country.

Our supply base is predominantly located in the UK and Europe, where modern slavery is not prevalent. Purchases vary in complexity from basic raw materials right through to bespoke major items such as synchronous generators. Whilst we understand that the majority of our supply chain is of low risk, we understand that we have to mitigate any modern slavery risks within our supply chain, however low.

Our [Supplier Handbook](#) specifically defines our expectations of suppliers and the treatment of their employees.

### Policy Effectiveness

Performance indicators are important in driving the performance of a business & shaping the way it operates. Gilkes is using the following goals & KPIs to provide focus in the next fiscal year.

Goals	Description
One	Development of a formal risk assessment process within our procurement policy 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

### Staff Training

As well as awareness training for our Procurement team & any other Supplier facing employees, we will also be focusing on risk assessment training to improve the supplier visits and audits that we conduct.

**This statement was approved by the Board of Gilbert Gilkes & Gordon Ltd on Fri 24 May 2024**



**Andy Poole MBA**  
Chief Executive Officer

24 May 2024