

UK Modern Slavery Act Disclosure

This Statement describes the activities of Howden Group Limited and its consolidated subsidiaries (collectively, “Howden,” “we” or “our”). We generally employ the same policies and compliance program relating to slavery and human trafficking across our entire business. Not all of our consolidated subsidiaries are subject to the UK Modern Slavery Act.

Business Overview: We enable our customers’ vital processes which advance a more sustainable world

Originally founded in 1854 by James Howden in Scotland, Howden has grown and evolved into a global leader in air and gas handling solutions. We provide support and expertise to multiple sectors including infrastructure, power generation, oil & gas, wastewater, metals, mining, renewable energies and transportation.

We work in partnership with our customers in over 100 countries, to deliver sustainable and customised solutions. We are proud that our people and our businesses play important roles in the communities that we operate in.

Risks of Slavery and Human Trafficking in our Business and Supply Chains

Due to the nature of our workforce, we believe that the risks of slavery and human trafficking in our own business are remote.

Similarly, based on the types of direct vendors that we work with and the goods and services that we purchase from them, we believe that the risks of slavery and human trafficking at this level of the supply chain are remote. The goods and services that we purchase from our direct vendors do not lend themselves to the use of seasonal, migrant or child labour.

We have limited visibility beyond our direct vendors. Like many other companies, our risk assessment is ongoing and we are evaluating our policies and procedures that are intended to mitigate slavery and human trafficking risk in our business and supply chains.

Code of Conduct

Howden’s goal is to maintain the highest ethical standards in the conduct of our business. Simply stated, our policy is that we will obey the law and act ethically.

Our Board of Directors has adopted a Code of Business Conduct and Ethics (the “Code of Conduct”) to promote Howden’s commitment to ethical standards of conduct and compliance with all applicable laws, rules and regulations. The Code of Conduct applies to all Howden Associates at all business units around the world. “Associates” include all sales agents, representatives, independent contractors, consultants, employees, officers, and when they are acting on behalf of Howden, the directors of Howden and is the centerpiece of Howden’s Compliance Program.

Among other things, the Code of Conduct provides that it is important that Howden’s workplace remain free from all forms of discrimination, intimidation and harassment and that each person be treated fairly and with respect. The Code of Conduct indicates that Howden will, at a minimum, meet all applicable employment laws, rules and regulations, including laws, rules and regulations governing working conditions, wages, hours, benefits and minimum age for employment, wherever it conducts business. Slavery and human trafficking would be a violation of the Code of Conduct.

Howden Associates are expected to uphold the Code of Conduct and are subject to disciplinary actions up to and including termination for failure to do so. Howden managers are responsible for compliance with and enforcement of the Code of Conduct for their area of operation, including for ensuring distribution of the Code of Conduct to each Associate under his or her supervision and assisting them in understanding and complying with the Code of Conduct. In addition, each of our Associates is required to acknowledge in writing at least annually that they have reviewed and understand the Code of Conduct.

Code of Conduct for Business Partners

Howden also has adopted a Code of Conduct for Business Partners that sets out the expectations and standards of Howden that apply to agents, distributors, dealers, contractors, intermediaries, joint venture partners, suppliers and other business partners doing business with Howden (“Business Partners”). Among other things, the Code of Conduct for Business Partners indicates that Business Partners are expected to:

- comply with all applicable national, state or regional, and local laws and regulations in the countries in which they operate;
- never employ workers younger than the local, legally required minimum age, and never use forced, bonded, indentured or slave labor; and
- treat each employee with dignity and respect, and not engage in or permit corporal punishment, threats of violence, or other forms of harassment.

The Code of Conduct for Business Partners indicates that Business Partners are expected to hold their employees, and, to the extent they supply goods or services for ultimate sale to or use by Howden, suppliers and other third parties, to the same standards. Business Partners are expected to adopt or establish a management system that supports the content of the Code of Conduct for Business Partners and drive continuous improvement in the areas covered by the Code. If a Business Partner refuses or is unable to correct an incidence of non-compliance to our satisfaction, we may terminate the relationship.

Training

As noted above, Howden holds its Associates and Business Partners accountable for maintaining Howden’s high ethical standards through the Code of Conduct and the Code of Conduct for Business Partners. Howden provides periodic training to its employees to reinforce the requirements of the Code of Conduct and Code of Conduct for Business Partners.

Grievance Mechanisms

Howden has established telephonic and online grievance mechanisms for reporting any existing or potential violation of the Code of Conduct or the Code of Conduct for Business Partners. Reporting can be made on an anonymous basis at the following websites: www.howden.ethicspoint.com, www.tip-offs.com (Africa Only). Reporting can also be made on an anonymous basis by using the Howden Ethics Hotline (the “Ethics Hotline”). Please use the hotline number associated with your location as specified at www.howden.ethicspoint.com. For Africa, please use the Deloitte Tip-off Anonymous Hotline, 0800 212 188.

For purposes of our compliance with the UK Modern Slavery Act, this Statement has been approved by the Boards of Directors of our subsidiaries that are subject to that Act and signed by the undersigned as a director of those entities.



By: Ross Shuster,
Chief Executive Officer