

MODERN SLAVERY ACT STATEMENT

Introduction from the Group Chief Executive

Spirax-Sarco Engineering plc prides itself on setting high standards for sustainable and ethical business practices in its operations worldwide. Included in those high standards is a commitment to respecting and protecting the human rights of all individuals and combating all forms of modern slavery or human trafficking in all parts of our business organisation, including our supply chain. We are continually developing and improving our business practices and policies in line with that commitment. We support a strong, collective stand to identify, prevent, and raise awareness of modern slavery and human trafficking practices in all parts of the world.

The Spirax-Sarco Group

Spirax-Sarco Engineering plc and its subsidiary companies (the Group) comprises two world-leading engineering businesses: Spirax Sarco, which designs, manufactures, and provides steam and thermal energy management solutions, and the Watson-Marlow Fluid Technology Group, which designs, manufactures and supplies peristaltic pumps and associated fluid path technologies. The markets we serve are wide-ranging, and include foods, beverages, OEM machinery, pharmaceuticals, refining and petrochemical, HVAC, healthcare, chemicals, water treatment, precious metal processing, pulp and paper, and power generation industries.

Spirax-Sarco Engineering plc is a global company with more than 75 operating units, including operating companies, branches and associates, in over 40 countries. Through our direct sales presence and a network of distributors, we serve customers in approximately 100 countries worldwide. The Group has its headquarters in Cheltenham, United Kingdom.

Group Policies Related to Slavery and Human Trafficking

Group policies which aid employees and management in upholding our standards include the following:

- Supplier Sustainability Code: in support of our Global Excellence in Supply Chain initiative, we are presently working with our suppliers in the supply chain of the products we manufacture across the globe to raise awareness of slavery and human trafficking issues. In signing our Supplier Sustainability Code, such suppliers will be required to adhere to sustainable, ethical business practices, including those which relate to human rights. Those suppliers will commit to ensuring that all forms of modern slavery and human trafficking are absent from their operations.
- Core Values statement: our Core Values of respect, accountability, passion, integrity, and delivery create a framework for making business decisions and conducting operations while upholding ethical standards. Specific to issues of slavery and human trafficking, the Core Values require our employees and management to

respect the individuals in the communities where they operate and which are affected by our business, and hold every individual in the organisation accountable for their professional decisions.

- Group Management Code: all Board members, Executives, General Managers and senior managers in the Group are advised of the policy of conducting business with proper regard for the communities in which they operate. All operating companies must certify their compliance with the Code on an annual basis. All employees have access to the Group Management Code through our intranet website. Detailed procedures, senior manager certification, and a system of regular internal audits and reporting, facilitate and monitor compliance with applicable laws and regulations.
- Group Health, Safety and Environmental Policy: we are committed to addressing health and safety issues in our everyday operations, and working to prevent slavery and human trafficking is a component of that process.
- Human Rights Policy Statement: we work to continually monitor our business partners, suppliers, and operations as a whole to ensure human rights are respected throughout our business.
- Whistle-blowing Policy and Hotline: our multi-lingual and multi-national Whistle-blowing Policy provides employees with a process, including an option of confidential reporting to an independent third party helpline called SafeCall, to raise concerns and disclose information related to suspected wrongdoing or dangers at work. This process is an added measure to ensure our compliance with all legal obligations and our ability to address ethical concerns, including issues related to human rights.

Our policies and procedures can be found here:

<http://www.spiraxsarcoengineering.com/Governance/Pages/policies-procedures.aspx>

Due Diligence Processes for Slavery and Human Trafficking

We believe in having robust policies in place to ensure that no modern slavery or human trafficking is present in our operations or within our global supply chain. This is a fundamental aspect of our commitment to upholding ethical standards with respect to human rights. The Group has implemented, and will continue to implement, measures to protect workers from being abused or exploited in our organisation or supply chain.

The Group has implemented a multi-pronged approach to raise awareness of, prevent, and identify potential instances of modern slavery and human trafficking.

Global Excellence in Supply Chain initiative

As described above, our Supplier Sustainability Code is a central component in bringing these issues to the attention of our suppliers and in establishing a joint effort in preventing human trafficking and slavery in our supply chain. We are presently reaching out to our

suppliers throughout the world to distribute and ensure compliance with the terms of this Supplier Sustainability Code.

Engaging distributors and other third party partners

Similar to the Supplier Sustainability Code, we are in the process of distributing an updated ethics statement to send to each of our distributors and other third party business partners throughout the world. This updated statement will make clear our ethical standards on human rights, our commitment to eliminating any form of forced labour or trafficking, and our full expectation that our distributors and business partners commit to the same.

Further Steps

As an additional measure of prevention, we may engage an independent third party to assist in the assessment and selection process for certain new and existing suppliers. This outside resource would perform background checks and investigations on potential suppliers to ensure compliance with our ethical business standards.

Our organisation is committed to maintaining effective policies and procedures to ensure that no individual within our organisation or supply chain is at risk of exploitation. We also intend, alongside any third party partners, to continue to work to identify areas of risk within our organisation and supply chain to ensure proper vetting of any supplier displaying certain risk factors.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 2015.

Nicholas Anderson, Group Chief Executive
Spirax-Sarco Engineering plc

1st March 2015