



# MODERN SLAVERY ACT

# TRANSPARENCY STATEMENT



# INTRODUCTION

Bodycote plc is committed to preventing modern slavery and human trafficking in all areas of its business and supply chain. Modern slavery is an abuse of fundamental human rights and includes practices such as forced labour, child labour, servitude and human trafficking.

Estimated approximately

**50m**

people worldwide are currently living in situations of modern slavery.

Bodycote plc is committed to preventing modern slavery and human trafficking in all areas of its business and supply chain. Modern slavery is an abuse of fundamental human rights and includes practices such as forced labour, child labour, servitude and human trafficking. It is estimated that approximately 50 million people worldwide are currently living in situations of modern slavery.

Bodycote recognises its responsibility to identify and address risks of modern slavery within its operations and supply chains. We are committed to acting ethically, maintaining strong governance and working with suppliers and partners to help prevent exploitation and protect vulnerable workers.

We are committed to respecting internationally recognised human rights across our operations and supply chains. Bodycote's Human Rights Policy is aligned with the Ten Principles of the UN Global Compact and incorporates the United Nations Universal Declaration of Human Rights and the International Labour Organization Fundamental Conventions.

Bodycote's approach to modern slavery forms part of our broader human rights due diligence framework, aligned with the United Nations Guiding Principles on Business and Human Rights. We recognise our responsibility to identify, assess and address risks of forced labour, child labour and human trafficking, and to take appropriate action where such risks are identified.

Our approach is underpinned by clear standards set out in our Anti-Slavery and Human Trafficking Policy, Human Rights Policy, Code of Conduct and Supplier Code of Conduct, supported by senior management oversight and embedded within key business processes, including recruitment, procurement, supplier onboarding and ongoing supplier management.

Through this framework, we assess inherent and emerging risks across both our own operations and our supply chain, implement controls to prevent and mitigate those risks, and take appropriate action where non-compliance or heightened risk is identified.

This statement is published pursuant to Section 54 of the UK Modern Slavery Act 2015 and outlines the steps taken by Bodycote plc and its subsidiary undertakings, as listed in the Appendix, during the financial year ending 31 December 2025 to mitigate the risk of modern slavery in our businesses and supply chains.

This statement was approved by the Board of Directors at a meeting of the Board held on 27 May 2026 and signed on its behalf by the Chief Executive Officer.

**Jim Fairbairn**  
Chief Executive Officer

27 May 2026



# HIGHLIGHTS OF OUR PROGRESS OVER THE PAST YEAR

- 1 Established a formal Modern Slavery Committee** to strengthen governance, oversight and cross-functional coordination
- 2 Increased the frequency of Board reporting** on modern slavery and broader compliance topics to a quarterly cycle
- 3 Updated and strengthened our Code of Conduct**, publishing it in multiple key languages for the first time to support effective global implementation



- 4 Updated the Anti-Slavery and Human Trafficking Policy** to reflect revised management responsibilities and incorporate examples of modern slavery red flags to support the effective identification of potential risks
- 5 Updated the Human Rights Policy**, including aligning the minimum working age to 15 in line with international standards
- 6 Revised the Supplier Code of Conduct** and initiated plans to publish it in key languages in 2026 to enhance accessibility and compliance
- 7 Conducted a Group-wide modern slavery risk assessment** to identify potential areas of exposure across operations and supply chains
- 8 Established a framework to deliver targeted risk assessment workshops** in higher-risk countries to deepen understanding of workforce-related risks and controls
- 9 Developed a supply chain risk segmentation model** to identify higher-risk suppliers based on geography and service category, supporting targeted due diligence

# HIGHLIGHTS OF OUR PROGRESS OVER THE PAST YEAR

## CONTINUED



**10** Reviewed the specialist third-party customer and supplier screening software (used to identify restricted or high-risk parties) to ensure it continues to meet our requirements for identifying businesses implicated in modern slavery breaches

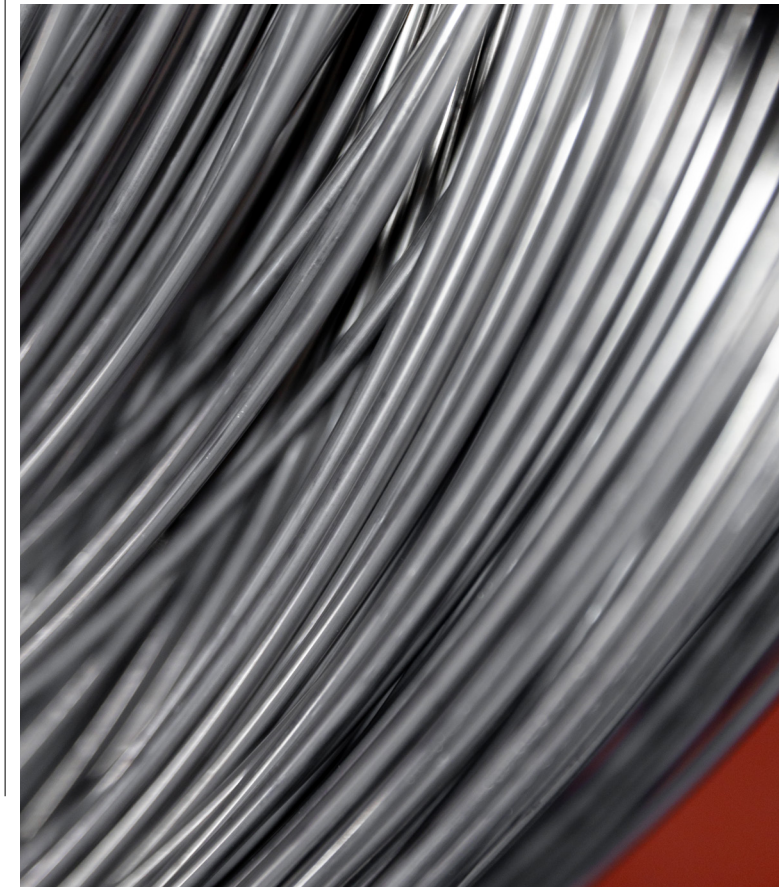
**11** Introduced the amfori BSCI framework to support structured management of social, environmental and ethical risks within the supply chain

**12** Implemented a Supplier Code of Conduct acknowledgement process to reinforce supplier accountability and expectations

**13** Launched the Bodycote Academy, a global online learning platform to deliver consistent, high-quality ethics and compliance training across the Group

**14** Enhanced the modern slavery training programme by introducing annual refresher training for relevant employees

**15** Launched a global compliance communications programme, including short-form video content, to raise awareness of modern slavery risks and promote use of the Open Door whistleblowing line



# OUR ORGANISATION, BUSINESS MODEL AND SUPPLY CHAINS

Bodycote is a global provider of performance metallurgy services, specialising in advanced thermal and surface processing technologies that improve and extend the life of metal components.

## OUR GLOBAL NETWORK OPERATES

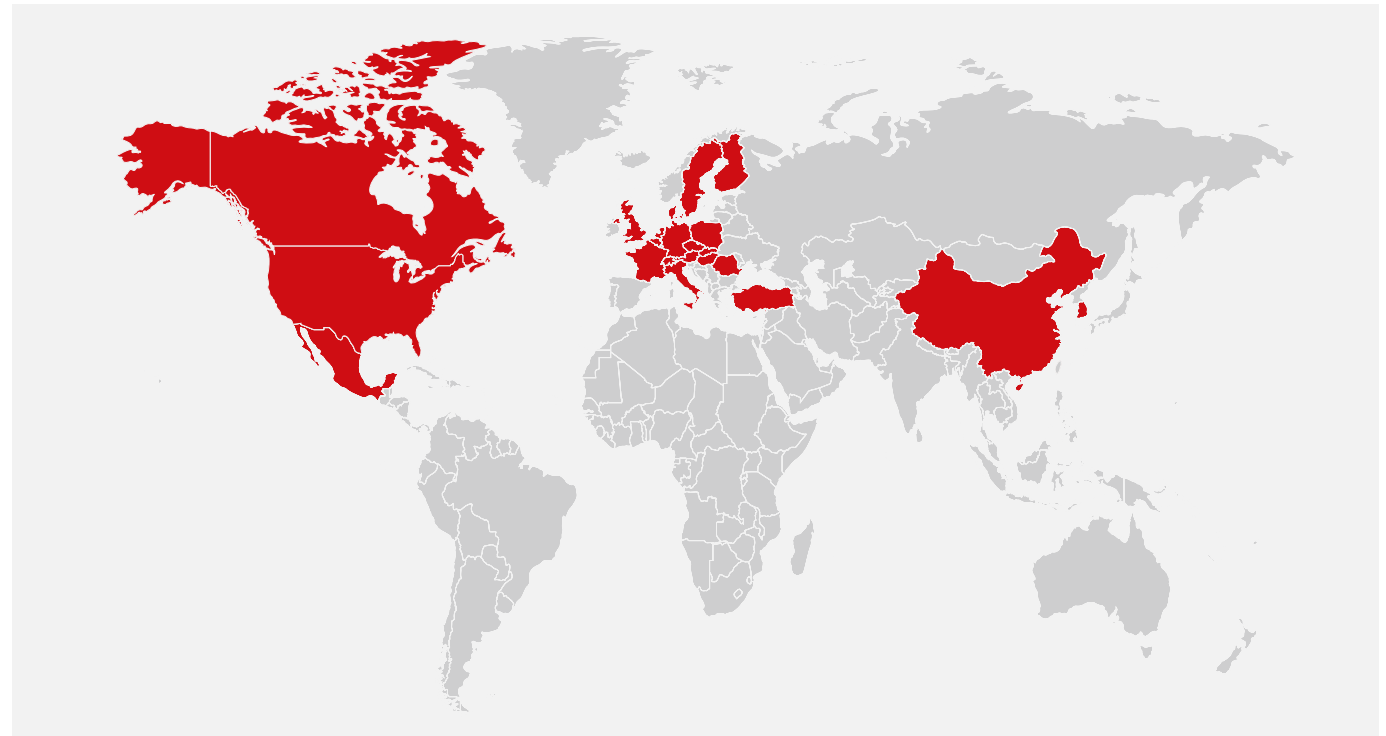
# 135

Operational sites

Across

# 22

countries



## SERVING CUSTOMERS ACROSS



**Aerospace & Defence**



**Automotive**



**Consumer, Medical & Other**



**Industrial Markets**



**Energy**

We have a strong presence in North America and Europe. The United States is Bodycote's largest market, accounting for approximately 36% of revenue in 2025, followed by France (13%), Germany (10%) and the United Kingdom (9%). Other key European markets include Sweden (6%) and the Netherlands (4%). Outside Europe, the Group has an established presence in Mexico (3%), China (3%) and Canada (2%), alongside operations across Central and Eastern Europe and other international markets, which together account for the remaining revenue.

The Group employs approximately 4,000 people across its global network, supporting operations in North America, Europe, Asia and other international markets.

**Our supply chain spans approximately 42 countries and includes around 12,000 suppliers. The majority of supplier spend relates to:**

- thermal processing equipment and capital equipment
- utilities including electricity and natural gas
- industrial gases
- temporary labour and recruitment services
- repair and maintenance services
- property leases
- logistics and transportation service

# OUR ORGANISATION, BUSINESS MODEL AND SUPPLY CHAINS

## CONTINUED



Bodycote operates across a diverse range of markets, each with differing levels of modern slavery risk and varying legal and regulatory frameworks relating to labour and human rights. We recognise that the prevalence and nature of these risks can vary significantly by geography and sector, and we take these differences into account when designing and applying our controls.

Accordingly, we adopt a risk-based framework to identify, assess and prioritise modern slavery risks across both our own operations and our supply chain. This includes assessing workforce-related risks within our operations and segmenting suppliers based on factors such as geography, sector and labour intensity, enabling us to focus enhanced due diligence and engagement on higher-risk areas.

While many of the markets in which we operate have well-established labour and human rights protections, risks can still arise, particularly in higher-risk categories such as temporary labour provision, maintenance services and logistics, as well as in certain higher-risk jurisdictions.

In 2025 we undertook a preliminary risk mapping exercise across our tier one supply chain to strengthen our understanding of potential risk exposure. This analysis identified certain categories as presenting relatively higher inherent risk, including temporary labour providers, logistics providers and selected maintenance contractors, particularly where services are delivered in higher-risk jurisdictions. The outputs of this exercise are being used to prioritise suppliers for further due diligence and engagement, as described further in the Risk Assessment and Due Diligence sections on pages 9-11.

In 2025, as a key part of our supplier onboarding procedure, we also reviewed our external customer and supplier denied party screening programme, provided by the global screening company, Descartes, to ensure it continued to meet our requirements for identifying businesses implicated for breaches of modern slavery.

As part of our ongoing risk assessment programme, in 2026 we commenced a series of country-level workforce risk assessment workshops in higher-risk locations, including China, Turkey, Mexico, Poland, Czechia and Slovakia. These workshops are designed to deepen understanding across local management teams of expectations relating to modern slavery and other core ethical and compliance topics, assess awareness of workforce and operational risks, and identify opportunities to enhance training, controls, internal communications and reporting mechanisms.

Our 2025 supply chain assessment focused on tier one suppliers, where we have the greatest level of visibility and influence. Work to expand supply chain mapping beyond tier one is planned as part of our ongoing programme to strengthen supply chain transparency over time.

Suppliers are expected to comply with Bodycote's Supplier Code of Conduct. Our general terms and conditions of purchase require suppliers to adhere to this Code, which sets out expectations regarding labour standards, human rights protections and compliance with applicable laws. We also expect suppliers to embed these principles within their own operations and to cascade Bodycote's standards to their workforce and, where appropriate, their own supply chains.

# GOVERNANCE AND POLICIES

Bodycote maintains a framework of policies and procedures designed to support ethical conduct, human rights protection and legal compliance across the Group. Compliance with these policies is monitored by the Board and Executive Committee, supported by the Internal Audit function and, at a local level, by General Managers.

During 2025, we strengthened this framework through a comprehensive review and relaunch of our compliance policies. This included an updated Code of Conduct, Supplier Code of Conduct, Anti-Slavery and Human Trafficking Policy and Human Rights Policy.

The Group Code of Conduct, available on our website in 16 languages, sets out our approach to legal compliance and ethical practices. It is supported by a suite of subject-specific policies, also available on our website, which provide further guidance on key compliance topics.

The Supplier Code of Conduct, also available in 16 languages, applies to all suppliers and defines the minimum standards expected of them. It consolidates Bodycote's expectations in relation to social, environmental and ethical matters, including human rights, into a single document and incorporates our sustainable procurement principles. Multilingual publication supports clear understanding and consistent implementation across our global supplier base.

These expectations are reinforced through our standard purchasing terms and conditions, which require suppliers to comply with the Supplier Code of Conduct. In 2025, we further strengthened supplier engagement by introducing a formal acknowledgement process for selected suppliers operating in higher-risk sectors and regions.

The Code of Conduct is reinforced through mandatory employee training covering key ethical and compliance topics. Employees complete training through the Bodycote Academy, which is refreshed annually and designed to reinforce expected standards of behaviour. Training topics include modern slavery, anti-bribery and corruption, fraud, the prevention of facilitation of tax evasion, data protection, competition law and the prevention of sexual harassment.

To support ongoing awareness, we introduced regular compliance communications through the 'B the Difference' programme, launched in July 2025. This initiative provides employees with updates on key legal and regulatory topics, policy reminders and guidance on raising concerns. Topics covered during 2025 included modern slavery, fraud and the prevention of sexual harassment.

We also introduced 'B Alert!', a short-form video training programme designed to raise awareness of key compliance topics. In 2025, this programme focused on communication standards and promoting awareness of the Open Door Line whistleblowing service.



## KEY POLICIES SUPPORTING BODYCOTE'S APPROACH INCLUDE:

### Code of Conduct

[Find out more >](#)

The Code of Conduct outlines expected standards of behaviour for employees and contractors and addresses topics including human rights, labour standards and ethical business conduct.

### Anti-Slavery and Human Trafficking Policy

[Find out more >](#)

This policy establishes Bodycote's zero-tolerance approach to modern slavery and human trafficking.

### Human Rights Policy

[Find out more >](#)

Bodycote is committed to upholding and respecting internationally recognised human rights. The Group's Human Rights Policy is aligned with the Ten Principles of the UN Global Compact and incorporates the United Nations Universal Declaration of Human Rights and the International Labour Organization Fundamental Conventions.

Our policy reaffirms Bodycote's commitment to freedom of association, the abolition of forced or compulsory labour, the elimination of child labour, the prevention of discrimination and the provision of safe and healthy working conditions. In 2025, the policy was revised and reissued to align the minimum working age with internationally recognised standards, setting it at 15 years.

### Supplier Code of Conduct

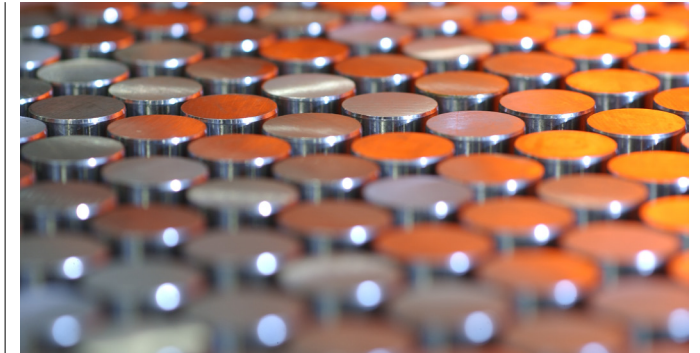
[Find out more >](#)

Suppliers are required to adhere to Bodycote's Supplier Code of Conduct, which includes expectations relating to labour standards and compliance with applicable laws.

### Conflict Minerals Procedure

[Find out more >](#)

The Group maintains procedures designed to prevent the use of conflict minerals in our supply chain.



## Operational accountability and Board oversight

Operational responsibility for Bodycote's modern slavery programme is co-led by the Chief Sustainability Officer and the Chief Excellence Officer. The Chief Excellence Officer holds responsibility for strategic procurement across the Group and therefore plays a key role in supply chain risk management. Both roles are members of Bodycote's Executive Committee.

Oversight of the modern slavery work programme is provided through the Group's Modern Slavery Committee. Membership of the Committee includes the Chief Human Resources Officer, the Chief Sustainability Officer, the Chief Excellence Officer, the General Counsel, the Company Secretary and the Head of Internal Audit and Risk.

The Chief Human Resources Officer is responsible for workforce and contractor-related modern slavery risk management and compliance obligations. The Head of Internal Audit and Risk ensures integration of modern slavery risk into Bodycote's enterprise risk management framework and risk registers.

The Modern Slavery Committee meets quarterly to review progress against the Group's modern slavery work programme and reports progress on key activities to senior management and the Board on a quarterly basis.



# RISK ASSESSMENT AND MANAGEMENT

Bodycote adopts a risk-based approach to identifying and managing modern slavery risks across its operations and supply chains.



## Annual assessment of risks and controls

Bodycote has established a Committee comprising senior managers to oversee the Group's approach to modern slavery, including undertaking a review of relevant procedures at least annually and regularly assessing modern slavery risks.

In the first half of 2025, the Committee engaged a third-party provider to facilitate a risk assessment exercise involving a broad cross-section of stakeholders from across the organisation. The assessment included structured discussions and scenario-based analysis to identify potential modern slavery risks within our operations and supply chain, evaluate the effectiveness of existing controls, and highlight opportunities for improvement.

The review confirmed that Bodycote's policy framework, processes and control environment provide a strong foundation for managing modern slavery risk. However, it also identified areas where further enhancements could strengthen risk mitigation and increase awareness of modern slavery indicators.

The assessment also highlighted inherent risk areas within our operations, including the use of temporary labour, contractors on site, and activities in certain higher-risk jurisdictions.

## THE FOLLOWING ACTIONS HAVE BEEN IDENTIFIED TO FURTHER ENHANCE OUR MODERN SLAVERY RISK MANAGEMENT FRAMEWORK:

### POLICY AND GOVERNANCE

- › Update key policies, including the Anti-Slavery and Human Trafficking Policy (to incorporate guidance on identifying red flags), the Human Rights Policy (to align minimum working age to 15), and the Open Door Policy (to strengthen references to modern slavery reporting and protections).

Current status: complete

### TRAINING, AWARENESS AND COMMUNICATION

- › Deliver enhanced and regular communications to employees, particularly operational staff, to improve awareness of modern slavery risks, red flags and reporting channels, supported by trained managers and reinforced through Group-wide compliance initiatives.
- › Increase the visibility and understanding of the Open Door Line reporting mechanism, including when and how it can be used.

Current status: implemented and ongoing

### SUPPLY CHAIN DUE DILIGENCE

- › Enhance due diligence on higher-risk suppliers, prioritised based on geography and sector (particularly labour agencies and outsourced service providers), including obtaining certification of compliance with applicable laws and the Bodycote Supplier Code of Conduct.

Current status: ongoing



## RISK ASSESSMENT AND MONITORING

- › Introduce a rolling programme of country-specific risk assessments, initially focusing on higher-risk jurisdictions such as China, Turkey and Mexico, and expand engagement across divisions and geographies to ensure a comprehensive understanding of risk.

Current status: ongoing

## CONTROLS AND ASSURANCE

- › Integrate modern slavery considerations into plant audit processes, with potential extension to selected suppliers and customers.
- › Assess and, where appropriate, implement mechanisms to identify indicators of modern slavery, such as unusual wage payment practices (e.g. multiple employees paid into a single account).
- › Increase the level of stress testing applied to modern slavery detection and prevention controls.

Current status: ongoing

We have made good progress in implementing these recommendations, with a number of actions completed and others embedded as ongoing activities or progressing as planned. The Group recognises that the management of modern slavery risk is an ongoing process requiring continuous vigilance and enhancement. We will continue to build on this progress, driving year-on-year improvements in our approach as part of our broader commitment to responsible and ethical business practices.



# DUE DILIGENCE PROCESSES

Bodycote undertakes due diligence processes designed to identify, assess and mitigate the risk of modern slavery within its operations and supply chain.



As part of this approach, Bodycote uses a third-party provider, Descartes, to conduct denied party screening of customers and suppliers against international sanctions lists and compliance databases. This supports the identification of potential compliance risks at an early stage of engagement.

Our general terms and conditions of purchase require suppliers to adhere to the Bodycote Supplier Code of Conduct and to comply with all applicable labour laws and standards. These contractual requirements establish clear expectations in relation to ethical business practices, including the prohibition of forced labour and other forms of modern slavery.

In 2025, we conducted an initial supply chain risk mapping exercise across our tier one suppliers. Suppliers were prioritised for further review based on country risk, labour intensity and sector-specific risk indicators. This exercise provided a structured basis for identifying higher-risk areas within our supply chain and informing subsequent due diligence activities.

In 2026, we intend to build on this work by introducing targeted screening of higher-risk suppliers using the amfori BSCI framework. This will support the development of a more detailed baseline understanding of potential labour risks within relevant parts of our supply chain and enable us to prioritise supplier engagement accordingly.



Where risks are identified, Bodycote seeks to engage constructively with suppliers to support improvements in labour standards. This may include requiring suppliers to implement corrective action plans, providing guidance or signposting to relevant training, and working collaboratively to address issues and prevent recurrence. While our approach prioritises engagement and improvement, failure to demonstrate adequate progress within a reasonable timeframe, or instances of severe non-compliance, may result in the termination of the supplier relationship.

As part of strengthening our supplier controls, we have also updated contractual arrangements with certain suppliers to clarify expectations and responsibilities. In a small number of cases, where suppliers did not agree to these revised terms, we have taken the decision to cease engagement.

# EFFECTIVENESS AND MONITORING

We monitor the effectiveness of our efforts to combat modern slavery through a combination of governance, engagement and risk assessment activities. This includes regular reviews of relevant policies and procedures to ensure they remain aligned with evolving legal requirements and best practice, encouraging feedback from employees and other stakeholders to identify potential areas of concern, and periodically undertaking risk assessment exercises to evaluate the effectiveness of our controls and identify emerging risks.



The Board and Executive Committee play an active role in oversight. They review compliance training completion rates and receive regular reports relating to the Open Door Line whistleblowing service, including analysis of the number, nature and outcome of reports received. This supports ongoing visibility of potential issues and helps to inform continuous improvement in our approach.

Looking ahead, we intend to further enhance our monitoring framework through the development of targeted internal metrics. These will include tracking the proportion of higher-risk suppliers subject to enhanced screening and monitoring the number and outcomes of supplier engagement activities. Over time, these indicators will provide greater insight into the effectiveness of our due diligence processes, support more informed decision-making, and enable us to focus our efforts on areas of highest risk.

# WHISTLEBLOWING PROCEDURES

Bodycote provides a range of channels for employees and external parties to raise concerns or report suspected wrongdoing in connection with our operations or supply chain.

These include:

- an independent, third-party operated whistleblowing helpline and email service, the Bodycote Open Door Line
- internal grievance mechanisms managed by our HR function

These channels are available 24 hours a day, 365 days a year, and the Bodycote Open Door Line can be accessed anonymously where the individual chooses. Services are also available in multiple languages to support accessibility across our global operations.

Our Open Door Line is available to all employees and external stakeholders and is actively promoted through a variety of channels, including posters in plants and offices, the Group intranet homepage, the Bodycote website, the Code of Conduct, the Supplier Code of Conduct, relevant Group policies, and regular compliance communications.

We are committed to fostering a culture of openness and accountability, where individuals feel able to speak up without fear of retaliation. To support this, we continue to deliver training and leadership communications to reinforce awareness of reporting channels and the importance of raising concerns. In addition to the Open Door Line, employees may also raise concerns through local grievance procedures managed by our HR function.

All reports received through these channels are taken seriously and are investigated appropriately. Where requested, feedback is provided to the individual raising the concern.

The Board and Executive Committee maintain oversight of whistleblowing arrangements, including receiving regular reports on the number, nature and outcomes of concerns raised through the Open Door Line.

All reports received through the Open Door Line in 2025 were investigated and appropriately resolved. None of the reports received during the year related to modern slavery concerns.

In addition to formal whistleblowing channels, Bodycote has strengthened a range of mechanisms in 2025 to support open communication and ensure that colleagues can raise concerns or share feedback with senior management outside of their direct reporting lines, as part of a broader cultural initiative to promote openness and transparency. These include regular skip-level meetings (meetings where senior leaders engage directly with employees below their immediate reporting line), which provide opportunities to validate understanding of issues at site level and encourage open dialogue across different levels of the organisation.

These initiatives are complemented by an enhanced programme of Executive site visits and Board engagement activities, providing increased opportunities for direct interaction with colleagues across the business. In 2025, we also introduced a Group-wide employee engagement survey, enabling colleagues to provide anonymous feedback on their experience of working at Bodycote.

In addition, we have strengthened cross-organisational communication through a series of General Manager conferences, led by Executive and senior management, which create more direct lines of communication between operational leadership and senior leadership. These initiatives are supported by our simplified organisational structure across plants, divisions and corporate functions, which enables a clear and effective flow of information from site level through to management and leadership. Together, these channels complement our formal reporting mechanisms and support a culture in which concerns can be raised openly, heard and appropriately addressed.

If instances of forced labour or human trafficking were identified through any of these channels within our operations or supply chain, Bodycote would work with relevant stakeholders to ensure appropriate remediation for affected individuals and to address the root causes of the issue.



# TRAINING AND AWARENESS

We adopt a risk-based approach to ensuring that relevant colleagues across our global operations receive training on modern slavery and human trafficking.

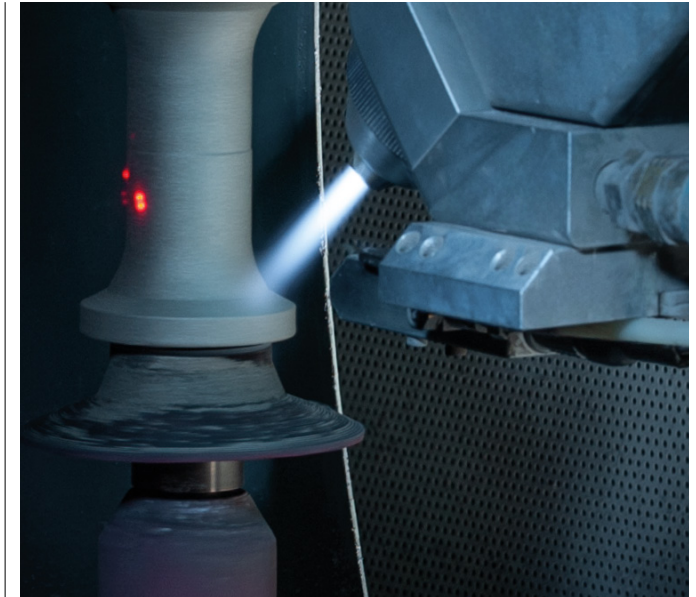


In 2025, we completed the rollout of our global learning management platform, the Bodycote Academy, expanding access to training and development across all 16 of Bodycote's key languages. As part of this, employees complete approximately four hours of induction e-learning covering 12 core mandatory compliance topics, with additional content to be introduced as we continue to expand the learning library.

All colleagues are required to complete a mandatory e-learning module on modern slavery within 90 days of joining the business. This training is embedded within our induction processes and is delivered through the Bodycote Academy. The training focuses on raising awareness of modern slavery and human trafficking risks, helping colleagues to identify potential indicators and equipping them with the knowledge and tools to report concerns effectively. It includes real-world case studies to illustrate how risks may arise within manufacturing operations and supply chains. Completion of the module requires participants to successfully answer a series of assessment questions.

Colleagues in Executive and leadership positions, as well as those with procurement and human resources responsibilities, are required to complete refresher training on modern slavery annually. In 2025, this training was reissued to approximately 1,270 colleagues in relevant roles and functions, with a current pass rate of 96%. Overall, modern slavery training was completed by employees representing approximately 29% of the global workforce.

Regular training and ongoing compliance communications help ensure that colleagues remain aware of modern slavery risks and understand how to raise concerns safely and appropriately.



# FUTURE PRIORITIES

Bodycote is committed to continuously strengthening its approach to identifying and addressing modern slavery risks. In recent periods, our focus has been on assessment, evaluation and awareness-building. We are now moving to embed these insights into business-as-usual practices, with an emphasis on sustaining progress, reinforcing accountability and driving continuous improvement.

This transition forms part of a broader, multi-year programme to enhance our control environment, including work undertaken in relation to compliance with Provision 29 of the UK Corporate Governance Code, through which we have identified opportunities to further strengthen and formalise existing controls.

As part of this evolution, we have established a new strategic procurement team, enhancing our capability to identify, assess and manage supply chain risks, particularly in higher-value and higher-risk markets.

In 2026, the Group will focus on embedding and enhancing existing controls, building on the 2025 externally facilitated risk assessment (see pages 9 and 10), and our Provision 29 compliance work.

#### Key priorities include:

- embedding control enhancements identified through risk assessments and compliance activities, with a focus on consistent implementation and monitoring across the Group
- progressing implementation of a Supplier Due Diligence Policy to formalise and strengthen our risk-based approach to supplier onboarding, screening and ongoing monitoring
- initiating screening of higher-risk suppliers using the amfori BSCI framework to establish a baseline understanding of labour-related risks and inform prioritisation of further due diligence
- undertaking targeted supplier engagement in higher-risk areas, including obtaining certifications, conducting follow-up reviews and supporting proportionate corrective actions where appropriate
- further developing a structured internal investigations framework to support consistent identification, escalation and resolution of potential issues

While many elements of our framework are now established, further development of supply chain due diligence will remain a key focus area.

As with any large international organisation, managing modern slavery risk requires ongoing and sustained activity. Training, risk assessment, supplier engagement and monitoring are therefore continuous by design, ensuring our approach remains effective and responsive.

Over the next reporting period, we aim to complete risk screening of higher-risk suppliers in our tier one supplier base and to expand supplier engagement in areas where potential risks are identified. More broadly, we will continue to build on this progress, embedding our risk-based approach to identifying and managing modern slavery risks across the business, and strengthening our approach over time through ongoing focus and continuous improvement.



## SUBSIDIARIES

Name of entity	Country of incorporation
Bodycote Austria GmbH	Austria
Bodycote Hot Isostatic Pressing NV	Belgium
Bodycote Heat Treatment Canada, Inc.	Canada
Bodycote Thermal Processing Canada, Inc	Canada
Bodycote Surface Technology Canada Property, Inc.	Canada
Bodycote (Changzhou) Heat Treatment Co., Ltd.	China
Bodycote (Jiaxing) Heat Treat Co., Ltd.	China
Bodycote (Jinan) Heat Treatments Technology Co., Ltd.	China
Bodycote (Kunshan) Heat Treatments Technology Co., Ltd.	China
Bodycote (Wuxi) Technology Co., Ltd.	China
Bodycote HT s.r.o.	Czech Republic
Bodycote SSC s.r.o.	Czech Republic
Bodycote Varmebehandling A/S	Denmark
Bodycote Lämpökäsittely Oy	Finland
Bodycote SAS	France
Bodycote Sud-Ouest SAS	France
Bodycote Bourgogne SAS	France
Bodycote France Holdings SA	France
Bodycote Lyon SNC	France
Bodycote Deutschland GmbH	Germany
Bodycote European Holdings GmbH	Germany
Bodycote Hirzenhain GmbH	Germany
Bodycote Schmerbach GmbH	Germany
Bodycote Specialist Technologies GmbH	Germany
Bodycote Specialist Technologies Deutschland GmbH	Germany
Bodycote Wärmebehandlung GmbH	Germany
Bodycote Hungary Hökezelő KFT	Hungary

Name of entity	Country of incorporation
Bodycote Ireland Finance DAC	Ireland
Bodycote Trattamenti Termici SpA	Italy
Bodycote Jersey Holdings Limited	Jersey
Bodycote Rheintal Wärmebehandlung AG	Liechtenstein
Bodycote Hardingscentrum BV	Netherlands
Bodycote Hardingscentrum No.2 BV	Netherlands
Bodycote Polska sp z.o.o.	Poland
Bodycote de SLP, S. de R.L. de C.V.	Mexico
Bodycote Thermal Processing de Mexico, S. de R.L. de C.V.	Mexico
Bodycote Thermal Processing de Mexico Servicios, S. de R.L. de C.V.	Mexico
Bodycote Specialist Technologies Korea, LLC	Republic of Korea
Bodycote Tratamente Termice SRL	Romania
Bodycote Slovakia s.r.o.	Slovakia
Bodycote Hot Isostatic Pressing AB	Sweden
Bodycote Sweden AB	Sweden
Bodycote Thermotreat AB	Sweden
Bodycote Värmebehandling AB	Sweden
Bodycote Ytbehandling AB	Sweden
Bodycote (Suisse) SA	Switzerland
BDC Enterprises SA	Switzerland
HTM Biel GmbH	Switzerland
Bodycote Istanbul Isil Islem Sanayi ve Ticaret AS	Turkey
Bodycote America Capital Limited	UK
Bodycote America Finance Limited	UK
Bodycote America Treasury Limited	UK
Bodycote Finance Limited	UK

**SUBSIDIARIES CONTINUED**

<b>Name of entity</b>	<b>Country of incorporation</b>
Bodycote Heat Treatments Limited	UK
Bodycote H.I.P. Limited	UK
Bodycote HIP Germany Limited	UK
Bodycote International Limited	UK
Bodycote Investments	UK
Bodycote Nominees No. 1 Limited	UK
Bodycote Pension Trustees Limited	UK
Bodycote Surface Technology Limited	UK
Bodycote Thermal Processing Mexico Limited	UK
Bodycote IMT, Inc.	USA
Bodycote K-Tech, Inc.	USA
Bodycote Syracuse Heat Treating Corporation	USA
Bodycote Thermal Processing, Inc.	USA
Bodycote USA, Inc.	USA
Bodycote Surface Technology Property LLC	USA
Bodycote Surface Technology Mexico LLC	USA
Bodycote Surface Technology, Inc.	USA
Bodycote Surface Technology Group, Inc.	USA
Bodycote Surface Technology Wartburg, Inc.	USA
Lake City Heat Treating LLC	USA

**Bodycote plc**

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