

Human Rights Policy

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1. Introduction

- 1.1. GKN Aerospace is committed to upholding human rights according to international standards, and to ensuring that the human rights of all our employees are protected. The purpose of this policy is to set out our standards and to affirm the importance of human rights to our strategy and sustainability.
- 1.2. We will establish a culture of compliance and will take direct responsibility for ensuring effective transmission of this policy, together with relevant guidance and training, and appropriate safeguards, monitoring, and resources, in order to ensure compliance.

2. Who is covered by this policy

- 2.1. This policy applies to all individuals working at all levels, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), contractors, trainees, casual workers/agency staff, volunteers, or any other person working for GKN Aerospace throughout the world.
- 2.2. This policy also applies to any person, or any organisation, working for or performing a service for or on behalf of GKN Aerospace – for example, pension trustees, consultants, lawyers, accountants, other business advisers, suppliers, agents, distributors, joint venture partners or other persons whilst they are working for or performing a service for or on behalf of GKN Aerospace throughout the world. We expect the highest ethical standards from our business associates and expect them to comply with or exceed the principles of our Supplier Code of Conduct.

3. Policy Statement

- 3.1. We have a zero-tolerance approach to the abuse of human rights and we are committed to acting ethically and with integrity in all our business dealings and relationships and to investing in, implementing and enforcing effective systems and controls to safeguard against adverse human rights impacts.
- 3.2. We are committed to respecting human rights in accordance with international human rights principles including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and The International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.
- 3.3. The below policies should be read in conjunction with this Human Rights Policy:
 - a) Anti-Slavery and Human Trafficking Policy
 - b) Code of Ethics
 - c) Conflict Minerals
 - d) Diversity and Inclusion Policy
 - e) Whistleblowing Policy

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4. **Forced and Child Labour**

- 4.1. We respect and comply with all relevant local laws regarding voluntary employment and minimum age for employment. We do not tolerate slavery, servitude and forced or compulsory labour and human trafficking in any of our operations or supply chain. Bonded, indentured or involuntary prison labour also is not accepted. More information can be found in our Anti-Slavery and Human Trafficking Policy.

5. **Freedom of Association and Collective Bargaining**

- 5.1. We respects the rights of employees across all businesses to participate in collective bargaining and freedom of association. Employees, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively in relation to a host of employee related matters. Employee representatives are not discriminated against and have access to carry out their representative functions in the workplace.

6. **Working Time and Wages**

- 6.1. We comply with working hours laws, and commit to offering employees fair compensation, that meets or exceeds the legal minimum standard in line with national wage and overtime laws. We will work closely with our suppliers to ensure that they respect their employees equally and with respect and dignity, for all employees to be of an appropriate age in compliance with the local legal minimum age for work, for all employees to be paid a fair wage that meets or exceeds the legal minimum standard or prevailing industry standard, to eliminate excessive working hours for all employees in compliance with local laws.

7. **Conflict Minerals**

- 7.1. Consistent with our Conflict Minerals Policy, we are committed to conducting business with integrity and in a responsible, ethical and sustainable manner. This applies to both our business operations and to our global supply chain.
- 7.2. Consistent with this commitment, if we source products or raw materials containing 3TG, we shall adopt procedures, to the extent required by applicable laws or customer expectations, to seek to identify whether such 3TG minerals are sourced responsibly and from conflict-free regions, taking a risk-based approach.

8. **Health and Safety**

- 8.1. We recognise the increasing importance of taking a holistic approach to employee wellness, to protect their physical and mental health and social wellbeing, and to foster a positive workplace culture that attracts and retains a highly skilled workforce.
- 8.2. We prioritise the safeguarding of employee health and wellbeing and we are committed to promoting wellbeing and to ensuring awareness and that our employees are safe. We will identify and manage workplace risk to prevent accidents and occupational illness.
- 8.3. We will work closely with our suppliers to ensure they respect and promote good working conditions across their supply bases, and for all workers' health and safety rights to be protected at work.

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9. Non-Discrimination

- 9.1. We are a meritocracy, and in all aspects of employment such as appointment, compensation, training and promotion we will respect each individual's human rights and will treat all individuals in a non-discriminatory manner. This is without regard for factors such as gender, race, ethnicity, country of origin, nationality, colour, social and cultural background, religion, family responsibilities (including pregnancy), sexual orientation, age and disability.
- 9.2. Please refer to our Diversity and Inclusion Policy for further insight into our stance on equal opportunities.

10. Due Diligence

- 10.1. We commit to ensuring that we are not complicit in human rights violations within our own operations and commit to taking a risk-based approach in performing human rights due diligence across our operations to assess risk exposure in line with applicable laws, and to ensure the effectiveness of this policy.
- 10.2. We will implement effective and proportionate measures to identify, assess and mitigate potential labour and human rights abuses across our operations and supply chain. These include training, modern slavery policies, employee handbooks and business-specific policies. All business specific employee policies are reviewed in order to ensure compliance with local laws and standards as a minimum.
- 10.3. We will work closely with our suppliers to ensure they respect human rights.

11. Remedy

- 11.1. We are committed to investigating, addressing and giving remedy in response to human rights violations that we have been found to have caused or contributed towards.

12. How to raise a concern

- 12.1. Everyone is encouraged to raise concerns at the earliest possible stage if they suspect any violation of human rights in our operations, supply chain, or relevant third parties' operations. If you believe that any part of this policy has been infringed, you should raise your concerns in accordance with our Whistleblowing Policy.

13. Responsibility for the success of this policy

- 13.1. This policy forms part of our compliance policies, which come under the overall responsibility of the board of directors of GKN Aerospace.
- 13.2. The executive team will take direct responsibility for ensuring effective transmission of this policy, and managers have a specific responsibility to facilitate the operation of this policy.
- 13.3. All employees should be aware of and are responsible for the success of this policy and should ensure that they take steps to support it.

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➤ **References**

| Ref | Reference Number | Reference Title |
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| 1 | COMP POL 01 | Whistleblowing Policy |
| 2 | COMP POL 03 | Anti-Slavery and Human Trafficking Policy |
| 3 | COMP POL 08 | Conflict Minerals Policy |
| 4 | [•] | Code of Ethics |
| 5 | [•] | Diversity and Inclusion Policy |

➤ **Change Record**

| Issue | Date | By | Details of change(s) |
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