

## Slavery & Human Trafficking Statement for GKN Aerospace Services Limited (the “Company”) for the year ended 31 December 2022

This Slavery and Human Trafficking Statement, made pursuant to section 54 of the Modern Slavery Act 2015, summarises the steps which the Company has taken to address the risk of slavery and human trafficking (“modern slavery”) in its operations and supply chains during the year ended 31 December 2022.

GKN Aerospace’s core values can be summed up in one phrase: doing the right thing – by our people, as a business, and in our world.

### OUR ORGANISATION

#### Business sector

The Company is an aerospace component supplier having manufacturing operations in the United Kingdom and in China at year end 2022 in the following locations:

**Aerostructures Operations** – supplying aerospace structural components to the aerospace market

- the Global Technology Centre, Filton and Western Approach, Bristol, United Kingdom
- Cowes, Isle of Wight, United Kingdom

**Special Technologies Operations** – supplying transparency solutions, de-ice protection systems, fuel tanks and flotation devices

- Luton, United Kingdom
- Portsmouth, United Kingdom
- Jingjiang, China

The Company operates from administrative offices in Solihull, and London UK and Shanghai, China. The Company is a wholly owned subsidiary of Melrose Industries PLC (“**Melrose**”), with respect to which Melrose’s group policies apply along with further specific policies implemented by the GKN group.

#### Organisation's structure

As at 31 December 2022, the Company employed around 3,300 people in its UK operations and had around 80 employees split across its Shanghai office and Jingjiang manufacturing site. During this time period, GKN also engaged around 300 contractors in addition to the 3,300 employees.

The GKN group as a whole employees around 15,000 people across its global footprint. This Slavery and Human Trafficking Statement has however been limited to the Company’s direct organisation structure and its supply chain operations and will not cover other parts of the GKN group which operate through different organisational structure lines.

### **SLAVERY AND HUMAN TRAFFICKING WITHIN OUR OWN ORGANISATION**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. GKN Aerospace (“we”) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015 (<https://www.gov.uk/government/collections/modern-slavery-bill#related->

[documents](#)) as well as the United States Government's policy prohibiting trafficking in persons under 48 CFR 52.222-50(b) (<https://www.law.cornell.edu/cfr/text/48/52.222-50>), and other relevant regulations. We expect the same high standards from all of our contractors, suppliers and other business partners.

## **Policies**

Set out below are the policies that applied to the Company and its business during 2022 and are referred to as the "Compliance Framework".

### *GKN Aerospace's Compliance Framework*

The GKN Aerospace Compliance Framework applies to all who work for a company controlled by GKN Aerospace such as the Company, whatever their job and wherever they were located. One of the key principles of the GKN Aerospace Compliance Framework is a respect for others; the GKN Aerospace Compliance Framework requires employees to treat people justly, and strictly prohibits the use of child or forced labour in GKN Aerospace's operations or supply chains.

The Company has processes in place to ensure that all new employees are made aware of the policies and all relevant employees will receive targeted training on specific mandatory policies. The content of the Compliance Framework policies is regularly monitored and updated as and when necessary.

The GKN Aerospace Compliance Framework was also available to all Company personnel via the GKN Aerospace intranet and has been included in a revised Aerospace Policy Management System which was launched in early 2023 to ensure ease of navigation as well as to enable Company personnel to more readily assess changes and updates to applicable policies.

### *Relevant Policies supporting the Compliance Framework*

#### *Anti-Slavery and Human Trafficking Policy*

The GKN Aerospace Anti-Slavery and Human Trafficking Policy requires the Company to comply with the requirements of the Modern Slavery Act 2015 and that we act ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

GKN Aerospace has engaged a third party online training specialist to prepare bespoke training on the GKN Aerospace Anti-Slavery and Human Trafficking Policy. This is currently scheduled to be rolled out in Q3 2023.

#### *Code of Ethics*

In November 2021, GKN launched the Code of Ethics policy to which the Company and its employees are required to follow. It sets out how we want to do business and sets out the standards of behaviour and business conduct we expect from all GKN Aerospace employees, together with the commitments our organisation makes in respect of the topics set out in the Code. It is design to ensure that our behaviour is consistent with our values and culture principles, both internally and with our external customers, suppliers and stakeholders. Our Code of Ethics explains how we want to do business.

#### *Conflict Minerals Policy*

In June 2021, GKN Aerospace launched a Conflict Minerals Policy with the aim of taking active steps to identify the use of conflict minerals within its products and those of its supply chain. The policy

requires the Company to take active steps to identify, monitor and mitigate the use of such materials in its operations.

The GKN Aerospace Compliance Framework is supported by a number of policies that set out minimum standards to be incorporated into our risk management and internal control systems throughout our businesses.

#### *Employment Policy*

The GKN Aerospace Employment Policy requires the Company to treat employees with respect and prohibits the use of child or forced labour in our operations. Specific elements of the GKN Aerospace Employment Policy pertinent to addressing the risk of modern slavery include the requirements for the Company to:

- comply with prevailing employment laws and regulations; and
- conduct pre-employment checks including references and the right to work.

#### *Human Rights Policy*

In March 2022, GKN launched a Human Rights Policy to demonstrate its commitment to upholding human rights in accordance with international standards and to ensure that the human rights of all GKN employees are protected and that they are afforded a safe working environment. It covers topics such as force and child labour, freedom of association and collective bargaining, working time and wages, conflict minerals, non-discrimination and requires the Company to take active steps to mitigate and remedy any abuse it may find following the conduct of appropriate due diligence.

#### **Assurance processes**

##### *Whistleblowing*

The Company operates and encourages the use of a confidential and anonymous whistleblowing hotline. The hotline is operated by an independent external service provider, which allows employees to speak in confidence to someone who is neither another employee nor their line manager. The external provider reports all employee disclosures to the Company's central legal & compliance function, who investigate calls to the hotline independently from the Company's management. The hotline is a free-phone telephone number, which is widely publicised at the Company's sites, on the GKN Aerospace Compliance Framework and via the GKN Aerospace intranet.

Employees are actively encouraged to report any behaviour inconsistent with the GKN Aerospace Compliance Framework or GKN Aerospace policies, which would include any actual or suspected incidents of modern slavery, to the Company's management directly or via the whistleblowing hotline.

During 2022, the Company received no reported concerns regarding modern slavery in its operations. If such an issue was reported, the Company would immediately undertake a thorough investigation of the issue complained of and where substantiated, and the Company would put in place robust action plans to eliminate the issue and protect any employees.

#### **Deployment and Implementation of GKN Aerospace Code of Ethics, Anti-Slavery and Human Trafficking Policy (amongst other group policies) at the Company's Shanghai Office and Jingjiang Site**

The Shanghai Office and Jingjiang Site are two wholly owned subsidiaries of the Company. With the deployment of the GKN Aerospace Compliance Framework at a global level, all GKN Aerospace compliance policies, including the Code of Ethics, the Anti-Slavery and Human Trafficking Policy, the Conflict Minerals Policy and the Whistleblowing Policy have been deployed through a 'mirror' portal and apply directly to both the Shanghai Office and Jingjiang Site. In order to facilitate employees' understanding on the compliance policies, the Company has implemented face-to-face compliance training sessions which were arranged for all the employees of Shanghai Office and Jingjiang Site

during 2022 in addition to the online training. In addition, regular compliance training sessions such as on-boarding training covering anti-slavery and human trafficking have been put in place.

### **Risk of slavery and human trafficking in our business**

We have considered the risk of modern slavery taking place in the Company's business during the year.

The risk of modern slavery occurring within the Company's direct employee and contractor population is considered to be negligible, taking into account: (1) the low prevalence of forced labour in the UK<sup>1</sup>; (2) the fact that the Company's policies apply directly to its Shanghai Office and Jingjiang site; (3) the roles being performed (and the skills and qualifications needed to perform those roles) by the Company's employees and contractors; (4) the policies adopted by the Company and the assurance processes in place; (5) the Company's recruitment processes; (6) the Company's access and security controls at its sites; and (7) the absence of reports of concerns or incidents regarding forced labour.

Taking into consideration the contractors' commitment to adhere to GKN Aerospace's Compliance Framework and the absence of any reports of concerns regarding forced labour from our employees who had visibility of contracted workers, the risk relating to such workers was considered to be managed and contained.

### **SLAVERY AND HUMAN TRAFFICKING WITHIN OUR SUPPLY CHAIN**

The complexity of our supply chain makes it challenging to effectively manage sustainability issues. Respecting human rights in the supply chain is ultimately our suppliers' responsibility. As customers, however, we play an active role in supplier development and have adopted various means to clearly communicate our expectations to our suppliers and monitor their compliance with them.

During 2022, unskilled roles within the Company were performed by the employees of embedded third party contractors. The nature of these roles and the limited visibility of our contractors' recruitment processes increased the risk of modern slavery for those workers. To mitigate this risk we made it explicitly clear that we would not tolerate the use of modern slavery in our businesses. Contractors were required to sign up to our standard supplier terms and conditions which mandated compliance with GKN Aerospace's Supplier Code of Conduct.

We expect our suppliers, their employees and their supply chains to operate in a way that supports our commitment to strong ethical standards.

### **Policies**

Policies affecting our suppliers during 2022 are described below.

#### *GKN Aerospace Supplier Code of Conduct*

The GKN Aerospace Supplier Code of Conduct sets out the minimum standards we expect from all our suppliers. The GKN Aerospace Supplier Code of Conduct prohibits the use of child or forced labour and requires compliance with applicable laws and regulations and internally accepted standards of workers' rights. It also contains explicit requirements to cascade our expectations down the supply chain and a right for the Company to visit supplier locations to ensure compliance with our requirements. During late 2022 and early 2023, GKN Aerospace revised its Supplier Code of Conduct with a view to bolstering, amongst other things, the flow-down requirements with regards to human rights and modern slavery. This was a further step to try and ensure that modern slavery is mitigated to the greatest extent possible and to further emphasise GKN Aerospace's zero tolerance approach to such matters. The revised Supplier Code of Conduct was launched in March 2023.

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<sup>1</sup> Based on the Global Slavery Index 2018 published by the Walk Free Foundation.

A link to the GKN Aerospace Supplier Code of Conduct can be found here:

<https://www.gknaerospace.com/globalassets/downloads/aerospace-suppliers-portal/gkn-aerospace-supplier-code-of-conduct.pdf>

GKN has also published third party versions of its key Compliance Framework policies which it expects its external associates (including suppliers) to comply with. These Summary Policies can be found here:

[Our Policies \(gknaerospace.com\)](https://www.gknaerospace.com/our-policies)

### *Due Diligence*

The Company undertakes due diligence on its suppliers when they are appointed. All suppliers are asked to sign and return a certificate confirming that they have received, read and understood the applicable third party Summary Policies and undertake to comply with the applicable terms before providing any services or goods to the Company. GKN sites also carry out comprehensive audits and assessments of key suppliers which cover a range of ethical conduct issues. GKN is further reviewing its global operations with a view to conducting more detailed assessments and audits on suppliers operating in higher risk jurisdictions from a human rights perspective.

### *Adverse Media Screening*

The Company screens its suppliers as part of an initial on boarding process and continues to do so on a daily basis against a range of media and denied parties databases. This process of screening would assist the Company in identifying any suppliers who have been publicly identified as being engaged in modern slavery. During 2022 such screening processes did not raise any issues of concern.

### **Assurance**

#### Site visits

In previous years regular visits were made by procurement personnel to many of our supplier facilities. This temporarily paused as a consequence of the COVID-19 pandemic, but onsite visits of a targeted number of suppliers have since recommenced. During 2022, such site visits did not raise any issues of concerns. Nevertheless, the Company is always looking to improve its processes and procedures to mitigate even further.

### **THE COMPANY'S EFFECTIVENESS IN COMBATING MODERN SLAVERY**

Having considered the above analysis and controls, the Company considers that it is effective in ensuring that slavery and human trafficking is not taking place in its business or supply chains, and that the steps it takes are both proportionate and effective.

This statement applies to the financial year ending 31 December 2022. It has been approved by the Board of Directors and signed by two directors on its behalf.

*Richard Gough*

Richard Gough  
Director  
For and on behalf of GKN Aerospace Services Limited

*Marisa Kismul*

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Director  
For and on behalf of GKN Aerospace Services Limited