
GKN AEROSPACE
ANTI-SLAVERY AND HUMAN
TRAFFICKING SUMMARY POLICY

1. POLICY STATEMENT

- 1.1 GKN Aerospace has a zero-tolerance approach to modern slavery and is 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.
- 1.2 GKN Aerospace is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from our contractors, suppliers and other business partners.
- 1.3 GKN Aerospace operates a strict Anti-Slavery & Human Trafficking (“**the Anti-Slavery Policy**”) to ensure that its expectations are clear to all who work for and with GKN Aerospace. This Summary Policy is a summary of the key provisions of the Anti-Slavery Policy.

2. APPLICATION

- 2.1 The Summary Policy and the Anti-Slavery Policy apply to all individuals working at all levels of GKN Aerospace, including officers, directors, senior managers, employees (whether permanent, fixed-term, or temporary), contractors, trainees, casual workers/agency staff, or any other person working for GKN Aerospace throughout the world (collectively referred to as “**Company Employees**”).
- 2.2 GKN Aerospace expects any suppliers and those who perform services for or on behalf of GKN Aerospace, for example, agents, advisers, consultants, contractors, and freight forwarders (referred to as “**External Associates**”) and persons, companies or entities with whom we enter into a joint venture, consortium or similar relationship (referred to as “**Relevant Joint Venture Partners**”) to comply with the Anti-Slavery Policy and the Summary Policy.
- 2.3 The United States Government has published FAR 52.222-50, Combating Trafficking in Persons, which is applicable to all GKN Aerospace organisations and employees supporting U.S. government contracts and such performance takes place outside of the United States. The Anti-Slavery Policy contains detail on the steps that must be taken in these circumstances.

3. WHAT IS MODERN SLAVERY

- 3.1 Modern slavery is term covering 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 exploit them for personal or commercial gain. Modern Slavery is a crime and a violation of fundamental human rights.

3.2 Under UK, Australian, Californian and the laws of other countries, large businesses have a legal duty to report on the steps they are taking to prevent modern slavery in their own business and supply chain.

4. COMPLIANCE MEASURES

4.1 GKN Aerospace publishes an annual Modern Slavery statement which sets out the steps taken to prevent modern slavery in our business and supply chain, which includes risk assessments, due diligence, training and a right to review and audit suppliers.

4.2 Our zero-tolerance approach to modern slavery is communicated to all External Associates at the outset of our business relationship with them and reinforced as appropriate thereafter. External Associates must comply with GKN Aerospace's Supplier Code of Conduct. We expect our External Associates, their employees and their supply chains to operate in a way that supports our commitment to strong ethical standards. The Supplier Code of Conduct also contains a right for the Company to visit supplier locations to ensure compliance with our requirements.

5. HOW TO RAISE A CONCERN

5.1 If Company Employees suspect that the Anti-Slavery Policy or this Summary Policy has been breached, they should speak to their line manager, HR contact or Head of Legal.

5.2 Company Employees can also make a disclosure through the GKN Aerospace Disclosure Hotline.

5.3 External Associates should speak to their GKN Aerospace contact or the General Counsel of GKN Aerospace; or email: speaking.up@gknaerospace.com.

5.4 GKN Aerospace encourages openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken. All concerns will be investigated. GKN Aerospace is committed to ensuring that no Company Employee suffers any detrimental treatment for raising a concern.

6. CONSEQUENCES OF BREACHES OF THE POLICY

6.1 Where appropriate we may liaise with relevant law enforcement bodies both in the United Kingdom or elsewhere.

6.2 Any employee who violates the Anti-Slavery Policy or the Summary Policy will face disciplinary action, which could result in termination of employment, removal from a contract, or other serious disciplinary action.

6.3 GKN Aerospace will consider terminating its contractual relationship with any External Associate or Relevant Joint Venture Partner for violating the Anti-Slavery Policy or the Summary Policy.