

STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015

Introduction

The Modern Slavery Act 2015 (the “Act”) requires large employers in the United Kingdom to take certain action to evaluate and address the risk of slavery and human trafficking in their supply chains.

This Statement of Compliance with The Modern Slavery Act 2015 is being issued by General Dynamics United Kingdom Limited (General Dynamics UK), in accordance with the Act to articulate our policies and practices around recognising and preventing slavery and human trafficking in our supply chain.

General Dynamics UK is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our operations, supply chain, and products and services. General Dynamics UK recognises that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and workplace abuse. Therefore, throughout this Statement we use the terms “slavery and human trafficking” to encompass these various forms of coerced labour.

Our commitment to compliance with the Act is further outlined in the General Dynamics Standards of Business Ethics and Conduct (the “Blue Book”) and various General Dynamics UK policies.

Structure, business model and supply chain

General Dynamics UK is one of the UK’s leading defence contractors. We supply the future of Armoured Fighting Vehicles, AJAX, to the British Army, as well as providing avionic and tactical communication and information systems to a global customer base.

General Dynamics UK operates as two distinct business units: Land Systems delivering AJAX, Mechanised Infantry Vehicles, Multi Role Vehicles and Light Armoured Vehicles, and Mission Systems delivering pioneering technology, specialising in state-of-the-art avionics systems and tactical communications and information transfer with a large international customer base.

General Dynamics UK’s registered office is in London with a further six locations throughout the UK. General Dynamics UK employs approximately 1,300 employees.

In the last 12 months, General Dynamics UK has worked with c.840 suppliers from across the globe in support of the AJAX, Foxhound, TacCIS and Air and Naval programmes. The majority of the suppliers are based in the UK, supporting in excess of 5,000 jobs across the UK economy, with 70 per cent of the direct supply base classified as Small to Medium Enterprise companies.

Our Policies

General Dynamics UK is committed to the highest ethical standards. We have introduced a number of policies that support our commitment to preventing acts of slavery and human trafficking.

All policies are reviewed at least annually to ensure continued compliance with the Act. Our policies and practices are as follows:

- **Anti-slavery Policy and Practice** (PR243) – ensuring that General Dynamics UK maintains compliance with the Act. This Policy requires the same standard of conduct from General Dynamics UK’s suppliers, contractors and third-party service providers in all dealings on our behalf.
 - **Supplier Approval - Review Process (SCM OP0050)** – ensuring suitable vetting of our supply chain and an on-going review of all our suppliers to ensure they undertake due diligence throughout their supply chains.
 - **Recruitment Policy** (P017) – detailing General Dynamics UK’s checks of an employees’ right to work in the UK
 - **Recruitment Policy and Screening and Vetting Policy** (DOCID-23-9018) – ensuring that all individuals employed by General Dynamics UK are appropriately vetted and have the right to work in the UK.
- Whistleblowing Policy** (PR004) – ensuring fair process and protection for whistleblowers. General Dynamics UK encourages all of its employees to report any concerns related to the activities of the company or its suppliers, contractors and third-party service providers. General Dynamics UK’s whistleblowing policy is designed to ensure that any matter raised under this policy will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the matter.

Our Training

We invest in educating our employees to recognise the risks of slavery and human trafficking in our business and supply chain. We provide mandatory modern slavery and human trafficking e-learning for all new office based employees and refresher training for all employees every three years. We maintain a database of all policies, which employees can readily access at any time.

Supply Chain Due Diligence

General Dynamics UK takes steps to evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. These expectations are codified in the Blue Book, our Policies and in our standard contractual terms and conditions.

These terms and conditions require suppliers to represent and warrant compliance with the Act and all applicable laws, regulations and international standards, including without limitation, UK laws and the laws in the country or countries in which they do business.

Our modern slavery strategy and due diligence process is developed and reviewed by our Procurement and Legal & Compliance teams to ensure that we take a coordinated approach across the business.

Aside to our standard terms and conditions we also require all our suppliers to complete an anti-slavery representation and warranty which asks them to commit to respecting and supporting international human rights and undertake that they will comply with their obligations under the Modern Slavery Act 2015. These statements are provided by our suppliers prior to them being ‘onboarded’ as a supplier. We then expect our suppliers to produce an annual anti-slavery certification to reinforce our collective commitment to tackling modern slavery throughout the supply chain.

We continue to look at ways in which we can strengthen our anti-slavery programme, and in 2020 we have introduced a modern slavery questionnaire for our suppliers to fill out as part of the onboarding process.

Audits

General Dynamics UK has introduced annual audits to measure its compliance with the Act and our statement of compliance.

Reporting

General Dynamics UK has a whistleblowing policy that provides a confidential mechanism for individuals to disclose concerns regarding slavery and human trafficking. It is the responsibility of all workers to report immediately any concerns or suspicions that modern slavery may be present in any parts of our business or supply chain to their manager, the Head of Legal & Compliance, or the Ethics Officer.

Continuous Improvement

We will continually review the effectiveness of our processes and, where necessary, introduce additional measures to ensure our compliance with the Act.

Signed: 6 April 2021

A handwritten signature in black ink, appearing to read 'A. E. Figgures', written over a horizontal line. The signature is stylized and includes a large flourish at the end.

Andrew Figgures
Chairman – General Dynamics UK Board of Directors