

## **STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015**

### **General Dynamics United Kingdom Limited Policy on Modern Slavery and Human Trafficking**

**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 (“GDUK”), in accordance with the Act to articulate our policies and practices around recognising and preventing slavery and human trafficking in our supply chain.

As a company with operations and suppliers around the world, we recognise the importance of ensuring that respect for human rights and dignity is embedded at all levels of our business. Strict adherence to these values, as well as to applicable laws, are expected by us everywhere we operate. GDUK does not tolerate human trafficking, child labour or forced labour anywhere within our businesses or supply chains.

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 GDUK policies and practices.

#### **Structure, business model and supply chain**

GDUK 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.

GDUK 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.

GDUK’s registered office is in London with a further four locations throughout the UK. GDUK employs approximately 1005 employees.

In the last 12 months, GDUK 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% of the direct supply base classified as Small to Medium Enterprise companies.

#### **Our Policies which relate to the Modern Slavery Act 2015**

GDUK 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 periodically to ensure continued compliance with the Act. Our policies and practices are as follows:

- **Anti-slavery Policy and Practice** (PR243) – ensuring that GDUK maintains compliance with the Act. This Policy requires the same standard of conduct from GDUK's suppliers, contractors and third-party service providers in all dealings on our behalf.
- **Supplier Approval - Review Process** (SCM OP0050 & PR248) – 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 GDUK's Recruitment Policy
- **Recruitment Practice** (PR230) – detailing GDMS' checks of a new employee's right to work in the UK
- **Recruitment Practice** (HRM-G1004) – *Detailing GDLS's checks of a new employee's right to work in the UK*
- **Recruitment Practice Mission Systems (Contractors)** (PR270) – detailing GDMS's checks of a contractors' right to work in the UK
- **Whistleblowing Company Practice** (PR004) – ensuring fair process and protection for whistleblowers. GDUK 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. GDUK'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.

## **Recruitment, Training and our Ethics and Compliance Programme**

Through undertaking due diligence in our activity, we seek to ensure that we do not inadvertently support modern slavery. We make our processes known to potential staff and suppliers as a means of encouraging good practice. We ensure that all staff are legally entitled to work in the UK and that the contract is directly with them. We also ensure that any recruitment agency we utilise for the placement of temporary staff follows the same requirements to confirm the identity and right to work of individuals placed with us.

GDUK maintain robust corporate ethics and compliance programs. We provide employees with regular training on our Ethos and our Standards of Business Ethics and Conduct. 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 and practices, which employees can readily access at any time.

## **Supply Chain Standards and Due Diligence**

GDUK 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, Legal & Compliance teams to ensure that we take a coordinated approach across

the business. Suppliers are obliged to notify GDUK if they become aware of any actual or suspected slavery or human trafficking in their supply chain. The supplier permits GDUK to inspect their premises and records to audit compliance their anti-slavery obligations and in the event a supplier fails to adhere to its modern slavery obligations the Company has the right to terminate the arrangement immediately.

Aside from 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' onto the GDUK supplier Approved Vendor List (AVL). We also request that our suppliers produce an annual anti-slavery certification to reinforce our collective commitment to tackling modern slavery throughout the supply chain. When undertaking a procurement exercise, we also reserve the right to challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.

We continue to look at ways in which we can strengthen our anti-slavery programme. We will continuously review our procurement processes to further embed checks on suppliers to ensure compliance with the requirements of the Modern Slavery Act 2015.

### **Audits**

GDUK has introduced periodical audits to measure its compliance with the Act and our statement of compliance. Such audits play a vital role in measuring the effectiveness of the company's risk mitigation and compliance with policies, procedures and processes.

### **Reporting**

GDUK 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 Legal Counsel, or the Ethics Officers (Local or Global).

### **Continuous Improvement**

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

Within the last 12 months GDUK:

- monitored the Company's compliance against the Act and against agreed set of Key Performance Indicators (KPIs);
- continued to utilise a central database which collates and shares information about suppliers across our business;
- continued to risk assess prospective suppliers at the outset of the procurement and 'onboarding' process, confirming our suppliers have taken action to reduce the risk of slavery and human trafficking in their supply chain;
- delivered training and support to our employees involved in procurement in relation to the risk assessment and due diligence process;
- continue to obtain more detailed information from any suppliers identified as medium to high risk as to the steps they have taken to address slavery and human trafficking and undertake enhanced due diligence prior to accepting them as a new supplier.

In the next 12 months, in order to further reduce the risk of modern slavery and human trafficking in our supply chain, GDUK is committed to:

- publish its Supplier Code of Business, which will set out the values and principles that are important to GDUK and which GDUK expect our suppliers to agree to in writing and follow. GDUK encourage our suppliers to adopt fair and ethical employment practices and they must take steps to ensure that slavery and human trafficking are not occurring in their business or in their supply chain;
- continuing to ensure our procurement strategies and contract terms and conditions include reference to modern slavery and human trafficking, where applicable;
- continue to take action to embed a zero tolerance policy towards modern slavery;
- taking appropriate other steps to identify and address risks of modern slavery or human trafficking in our business and supply chain. Our commitment reflects our values of being a responsible business which operates ethically and with integrity.

Date approved:

Signed:

Andrew Figgures

Chairperson – General Dynamics UK Board of Directors

6 March 2024