

**MBDA UK
MODERN SLAVERY
STATEMENT 2026**





**No. 1
IN
EUROPE**

MBDA IS THE ONLY EUROPEAN GROUP CAPABLE OF DESIGNING AND PRODUCING MISSILES AND MISSILE SYSTEMS TO MEET THE WHOLE RANGE OF CURRENT AND FUTURE NEEDS OF THE THREE ARMED FORCES



A EUROPEAN INTEGRATED DEFENCE COMPANY



A JOINT VENTURE OF THE THREE EUROPEAN LEADERS IN AEROSPACE AND DEFENCE: AIRBUS (37.5%), BAE SYSTEMS (37.5%) AND LEONARDO (25%)



This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes MBDA UK Limited's ('MBDA UK') Modern Slavery and Human Trafficking statement for the financial year ending 31 December 2025.

MBDA UK has a zero tolerance approach to Modern Slavery of any kind within its operations and supply chain. This statement references the principles applicable to MBDA UK with respect to Modern Slavery and Human Trafficking and sets out the steps that MBDA UK has taken within the statement period to ensure that Modern Slavery and Human Trafficking is not present in its business or its supply chain.

ORGANISATION STRUCTURE

MBDA UK is a private limited company, being the principle UK entity of the MBDA Group, an international group of companies, the holding company of which is MBDA UK's immediate parent MBDA SAS (the 'MBDA Group'). MBDA SAS is a joint venture company owned by BAE Systems PLC (37.5%), Airbus SE (37.5%) and Leonardo SpA (25%).

The MBDA Group operates in the focus countries of the UK, France, Germany and Italy, with operations in other countries as further documented at **Appendix 1**.

OUR BUSINESS

The MBDA Group is a European leader in defence systems and designs and produces a comprehensive range of complex weapon systems.

The MBDA Group serves more than 90 armed forces customers worldwide.

MBDA Group employs over 21,000 employees, of whom approximately 7,000 are employed by MBDA UK across its various sites. In 2025, approximately 2,600 new recruits joined the MBDA Group.

SUPPLY CHAIN

MBDA UK's supply chain plays a vital role in supporting the continued production and development of cutting edge missiles and missile systems for its domestic and export customers. Due to the complex nature of the products and their long life span, MBDA UK has fostered long lasting supplier relationships with companies who share its ethical standards.

The majority of MBDA UK's tier 1 suppliers are based in Europe and OECD (Operation for Economic Co-operation and Development) countries. As such, the majority of MBDA UK's suppliers are located in regions that are generally considered to present a lower risk in terms of Modern Slavery and Human Trafficking.

POLICIES AND PROCEDURES ON MODERN SLAVERY

Policies are translated into the language of all our focus countries to ensure employees and stakeholders can access and understand them.

Code of Ethics

MBDA Group has an established Code of Ethics that is central to all its operations and underpins the culture across the MBDA Group. The Code of Ethics can be found here: https://www.mbda-systems.com/wp-content/uploads/2020/03/MBDA-Code-of-Ethics-2020-report_UK.pdf

The Code of Ethics requires all employees across the MBDA Group to behave as an industry benchmark for innovation, operational excellence and ethical standards. Embedded within the Code of Ethics is the 'protection of fundamental freedoms and human rights' and the policy confirms our adherence to national laws and regulations and, in particular, to the principles enshrined in the Act. The Code of Ethics is available on the MBDA UK intranet site and at all of our sites.

Enhanced Recruitment Checks

In accordance with our Security Vetting policy, all permanent employees, contingent workers and contractors undertake enhanced due diligence and are required to undertake a level of security vetting. The default for MBDA UK is that they will hold a Baseline Personnel Security Standard as minimum, which ensures an individual's identity, nationality, immigration status and right to work.

Supply Chain Business Ethics Procedure

External to our business, our suppliers deliver an important part of the value in our products and play a crucial role in customer satisfaction. Our multi-faceted, robust and risk-based approach to supply chain business ethics is therefore fundamental in ensuring that our products are built to the highest ethical standards. We have expectations of how suppliers manage their ethical conduct and central to this is the Supply Chain Business Ethics Procedure. This procedure ensures the appropriate ethical assessment and validation of our current and future suppliers is carried out.

Reporting

The MBDA Group continues to operate a dedicated integrity line and associated management system. The MBDA integrity line procedure can be found here: https://www.mbda-systems.com/wp-content/uploads/2023/12/MBDA-INTEGRITY-LINE-Procedure_.pdf.

The 'integrity line' has been designed to follow the guidance established by *ISO37002 Whistleblowing management systems* and the requirements of *ISO37001 Anti-bribery management systems*. As specified in the procedure, it is open to a wide range of people including but not limited to employees, apprentices, interns, suppliers, customers, partners and stakeholders wherever located. It has been designed to capture, violations of the MBDA Code of Ethics, policies and procedures, violations of any applicable laws and regulations including those relevant to human rights and/or Modern Slavery and Human Trafficking, amongst other areas. MBDA UK and the MBDA Group is fully committed to an open culture of speaking up and listening and encourages concerned stakeholders to ask questions, raise concerns and report potential violations. Any report will be treated seriously, with the utmost importance and confidentiality.

Environmental Social and Governance (ESG) Strategy

MBDA UK has developed an ESG, Sustainability and Social Value Strategy up to 2030 ('ESG Strategy'). Modern Slavery is covered in both the 'Social' and 'Governance' strands of the ESG Strategy. The ESG Strategy is governed by an MBDA UK ESG steering group. The ESG Strategy is aligned to the UK Government's 'Social Value Model' and in particular the outcome of "Fair Work" and the criteria "identifying and managing the risks of modern slavery" as identified in PPN 002 (2025). As part of implementing the ESG Strategy, MBDA UK has:

- introduced (as described further below) a Group Sustainable Procurement Charter (the 'Sustainable Procurement Charter') and issued this to key suppliers;
- issued questionnaires to key suppliers regarding ESG readiness;
- continued as a partner in the 'Supply Chain Sustainability School' alongside shareholder BAE Systems PLC, which contains a significant number of resources on Modern Slavery as discussed further in the training section below. MBDA UK has now achieved Gold partner status; and
- started to use EcoVadis to identify tier 1 ESG risk which enhances our due diligence of the supply chain:
 - 1,600 suppliers have been initially screened via the EcoVadis IQ Plus tool; and
 - all new suppliers are added to EcoVadis, with their risk assessed and reviewed annually.

Supply Chain Contracts

The MBDA Group continues to operate and regularly update a contract negotiator's handbook to act as a template and guide when negotiating supplier contracts. MBDA UK supplier contracts require all suppliers to be compliant with applicable laws and regulations, which encapsulates compliance with the Act. Failure by our suppliers to act in accordance with applicable laws or regulations may result in MBDA UK terminating its contract with the relevant supplier.

In the 2025 statement period, the Legal and Compliance Directorate updated its 'Business Integrity' clause. The MBDA UK procurement team continue to be required to implement this clause within new supply contracts. The updated clause requires suppliers to be acquainted with the principles of the MBDA Group Code of Ethics, maintain records to demonstrate compliance, comply with any specific due diligence legal requirements regarding human rights, and a failure to comply shall entitle MBDA UK to terminate the contract.

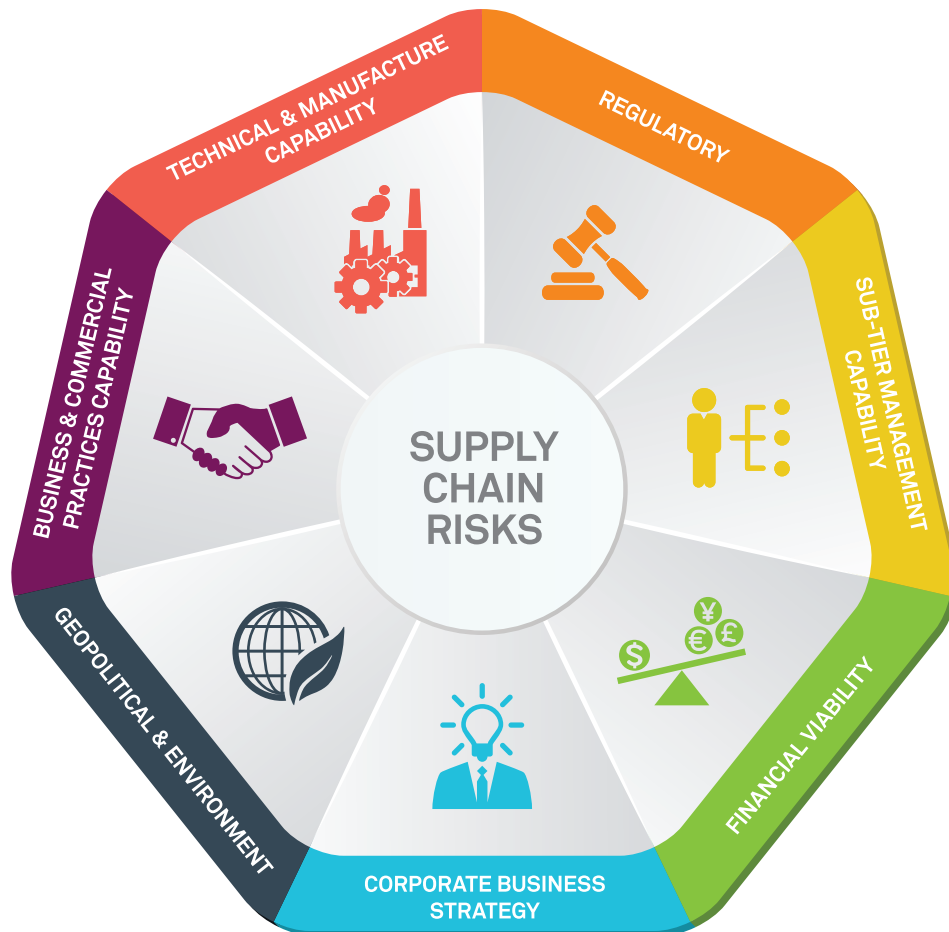
MBDA UK also continued to monitor potential legislative developments in the statement period, noting the updated Home Office statutory guidance on Transparency in Supply Chains published in March 2025. Further implementing the UK Home Office guidance will continue to be a key focus in 2026 across the MBDA UK business, along with any other related developments in the UK and the EU.

ASSESSING AND MANAGING RISK AND DUE DILIGENCE

We have a strong and well-established commitment to responsible business conduct, our internal processes demonstrate our dedication to transparency and ensuring that good supply chain practices are in place.

We assess potential suppliers as part of our risk registration process to ensure that we are working with ethical suppliers who share the same principles and values as us. We check a potential supplier's history before we contract with them, including any adverse media concerning slavery and human trafficking.

We work with our active suppliers to ensure they have appropriate systems and risk mitigation strategies in place to assess their own business and their sub-tier suppliers.



We deliver a Supply Chain Risk Management model that is based around seven key risk areas, creating a risk profile for each supplier at the earliest possible opportunity. This approach is aimed at improving the early identification, prevention and mitigation of supply chain risk in order to ensure a sustainable and high performing supply chain throughout the full lifecycle of our products. It achieves this by enhancing the levels of screening, risk understanding, mitigation and reporting across the MBDA Group.

If we consider that a company within our supply chain is deemed to be at higher risk with respect to Modern Slavery and Human Trafficking, the supplier will be subject to further in-depth assessments and planned risk mitigation (including possible termination), as appropriate. All of our active suppliers are subject to continued monitoring throughout their lifecycle contract with MBDA UK.

Following the execution of MBDA UK's supplier due diligence checks and processes, MBDA UK has not had cause to cease working with any entity due to Modern Slavery or Human Trafficking. This will be continually monitored during the next statement period. MBDA UK recognises that the absence of identified cases does not necessarily indicate the absence of risk.

Risk mapping

MBDA UK acknowledges the importance of risk mapping to understand where Modern Slavery and Human Trafficking may present a higher risk across its business. With the establishment of an MBDA UK Modern Slavery Steering Committee in 2026 (noted below), MBDA UK will centralise this risk mapping process.

The MBDA Group has analysed industry trends and engaged with internal and external stakeholders to create a materiality matrix to define the most material sustainability topics across the MBDA Group. These include: use of natural resources, workplace health and safety, compliance, business ethics and compliance and working conditions in the value chain. In addition, the Sustainable Procurement Charter addresses sustainability topics identified by the MBDA Group. The charter contains the following expectations for our suppliers in respect of Modern Slavery and Human Trafficking:

“Fighting child labour and slavery, servitude, forced labour, compulsory labour and human trafficking

Suppliers commit not to:

- *have employees or subcontractor employees below 15 years old even though it would be permissible under local law; and*
- *use any forms of slavery, servitude, forced, compulsory labour and human trafficking.*

Moreover, Suppliers commit to:

- *make sure that their Tier 1 suppliers abide to the same above prohibitions; and*
- *demonstrate that they have put in place systems or controls to address the above requirements.”*

“Conflict materials

Suppliers are expected to comply with all applicable laws and regulations regarding direct and indirect sourcing of conflict materials and conflict minerals.

MBDA expect our suppliers to:

- *Commit to adherence to the EU Conflict Minerals Regulation where applicable, and flow this requirement down through their supply chains.*
- *Be transparent and open with MBDA on the source of any minerals used to fulfil their contracts and evidence due diligence measures are in place.*
- *Inform MBDA immediately if they find or suspect that minerals from conflict-affected and high risk areas are being used within the supply chain and provide details of mitigating actions being taken.”*

TRAINING AND AWARENESS OF MODERN SLAVERY

We remain committed to increasing our employees' awareness of Modern Slavery and Human Trafficking and we will continue to update policies and processes as appropriate, whilst identifying priority segments of our supply chain.

MBDA UK has a specific training segment on Business Ethics and Compliance. On joining MBDA UK, all employees are required to attend this mandatory session, which explains the policies (set out above), the importance of the Code of Ethics and how this underpins the culture within the MBDA Group.

Importantly, the training reiterates that every employee should report any concern they may have, including any concern relating to Modern Slavery and Human Trafficking. In addition to the above, MBDA UK also has a yearly mandatory Code of Ethics Awareness training course and assessment for all employees. The course reinforces MBDA UK's values and commitments, it identifies expected ethical behaviours and identifies how to recognise situations that present a greater risk.

MBDA UK has a Procurement and Supply Chain Academy whereby the procurement community is afforded access to advanced formal and bespoke training to allow professional development. All procurement and supply chain personnel are required to carry out a mandatory e-learning module (including assessment) called *Working with Integrity in the Supply Chain* on Business Ethics & Compliance, including a section on Modern Slavery and Human Trafficking.

MBDA UK is a partner in the 'Supply Chain Sustainability School', which contains key modern slavery resources such as training modules on *A Practical Guide to Understanding Modern Slavery Risk in Supply Chains and Transparency in supply chains: A practical guide 2025*.

GOALS AND EFFECTIVENESS IN COMBATING MODERN SLAVERY

Goals

MBDA UK has two main goals in combating Modern Slavery and Human Trafficking:

1. To ensure that Modern Slavery and Human Trafficking continues to have no place within MBDA UK and its supply chains; and
2. To ensure that all employees in MBDA UK are aware of the Act and implement the Code of Ethics as part of their daily role.

MBDA UK uses the following mechanisms to measure effectiveness in tackling Modern Slavery and Human Trafficking:

- Each year, MBDA UK's Directors participate in and contribute to an in-depth review of the MBDA Group Strategy in terms of past performance and the future by the generation of an integrated strategic business plan. Any risks in relation to ethical non-compliance in our supply chains will be carefully considered and action taken;
- The MBDA Group has a Committee for Business Ethics and Corporate Responsibility who are responsible for defining and updating relevant policies and procedures to ensure the highest ethical standards within the MBDA Group and its supply chains are maintained;
- MBDA UK has its own National Compliance Officer who has a direct escalation route to the UK MD for any national compliance matters, including with respect to compliance with the Modern Slavery Act. As such, any issues detected concerning modern slavery are dealt with at the highest level within MBDA UK;
- MBDA UK has established an ESG steering group, which is focused on implementing the ESG Strategy within MBDA UK. It is chaired by the Deputy MD and it meets six times a year. As noted above, the prevention of Modern Slavery and Human Trafficking forms a key part of the ESG strategy; and
- MBDA UK is establishing a standalone Modern Slavery Steering Committee which will comprise of key stakeholders across the UK business and that will report into the UK Business Review. It will be a central focus for improvement, risk mapping, and the collection and monitoring of KPIs relating to Modern Slavery and Human Trafficking.

Key Performance Indicators

- No incidents of Modern Slavery and Human Trafficking were reported in MBDA UK within the statement period.
- No substantiated reports were received by the Integrity Line regarding Modern Slavery or Human Trafficking related to MBDA UK within the statement period.
- 100% of the procurement community in MBDA UK completed the Code of Ethics Awareness training within the statement period.

This statement has been approved by the Board of MBDA UK Limited at a board meeting held on 29 June 2026.



Chris Allam

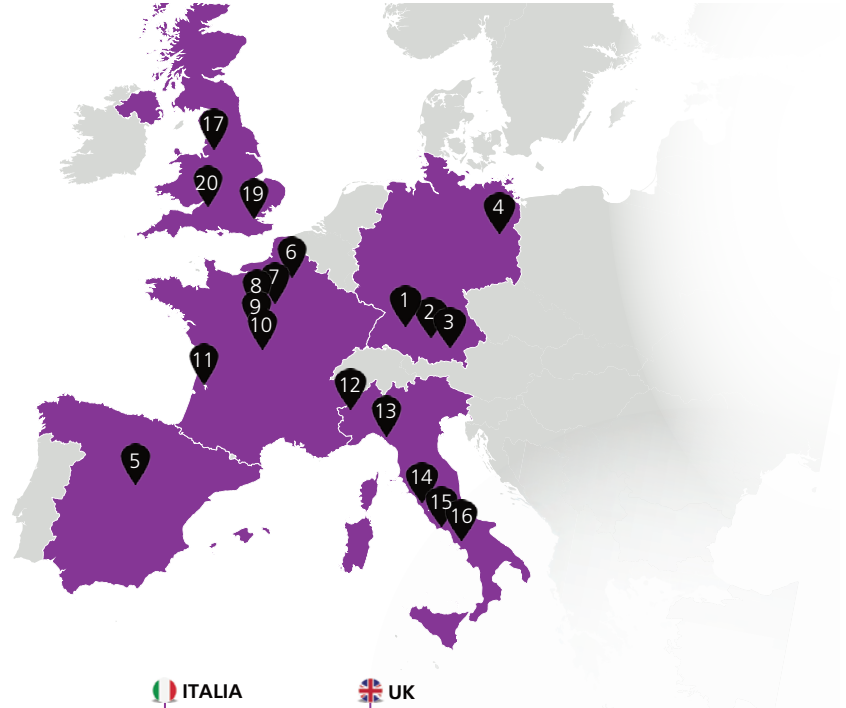
Managing Director MBDA UK

MBDA committed to tackling slavery and human trafficking in our industry.

MBDA UK MODERN SLAVERY STATEMENT 2026

APPENDIX 1

MBDA LOCATIONS



DEUTSCHLAND

- 1 **Ulm**
R&D/Production
- 2 **Schrobenhausen**
Management/R&D/
Production/Integration
- 3 **Aschau**
R&D/Production
- 4 **Berlin**
Management

ESPAÑA

- 5 **Madrid**
Management/R&D

FRANCE

- 6 **Venette**
Electronics/Manufacturing
- 7 **Le Plessis-Robinson**
Management/R&D/
Propulsion systems headquarters
Paris
Digital excellence
- 8 **Elancourt**
Simulation Systems
- 9 **La Ferté Saint-Aubin**
Propulsion systems industrial site
- 10 **Bourges Aéroport**
Bourges Subdray
Selles-Saint-Denis
R&D/Production/Integration
- 11 **St Médard-en-Jalles**
Propulsion systems industrial site

ITALIA

- 12 **Torino**
Laser/Platform
Integration
- 13 **La Spezia Aulla**
R&D/Integration
- 14 **Rome**
Management/R&D
- 15 **Fusaro**
R&D/Production/
Integration
- 16 **Pomiglianod'Arco**
Production/
Integration

UK

- 17 **Bolton**
Production
- 19 **Henlow**
Production
Stevenage
Management/R&D/
Integration
London
Management
- 20 **Bristol**
R&D/Software & Systems

