

UK MODERN  
SLAVERY STATEMENT  
RESPONSE 2021



# UK MODERN SLAVERY STATEMENT RESPONSE 2021



*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 2020.*

*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.*

**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**



**AIR, LAND, SEA**

**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%)**



## ORGANISATION STRUCTURE, OUR BUSINESS AND SUPPLY CHAINS

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%).

MBDA UK's tier 1 suppliers are located in 28 countries, 99% of which are based in Europe and OECD countries.

## POLICIES ON MODERN SLAVERY

### 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 2020 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](https://www.mbda-systems.com/wp-content/uploads/2020/03/MBDA-Code-of-Ethics-2020-report_UK.pdf)

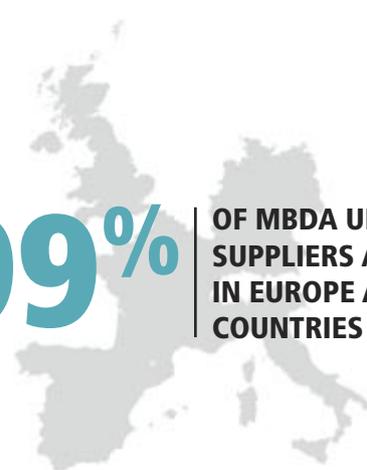
The Code of Ethics requires all employees across the MBDA Group to behave as an industry benchmark for innovation, operational excellence and ethical standards. Embedded within the Code of Ethics is the 'protection of fundamental freedoms and human rights' and the policy confirms our adherence to national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

The Code of Ethics is reviewed regularly to ensure that any changes to legislation are appropriately embedded so that the MBDA Group continues to conduct its business activities to the highest ethical standard.

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“ Our ability to understand potential risk in our Supply Chain is fundamental to our working practices and, as such, we ensure our employees receive the appropriate training and support. ”

99% OF MBDA UK'S TIER 1 SUPPLIERS ARE BASED IN EUROPE AND OECD COUNTRIES



### 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 has a specific policy – Process for the Management of Allegations – to ensure that all employees feel able to report confidentially any concerns relating to modern slavery. The MBDA Group has also created a specific reporting email address to report any such allegations. Any report will be treated seriously and with the utmost importance.

### Supply Chain contracts

MBDA UK supplier contracts require all suppliers to be compliant with UK Law, including compliance with the Act. Failure by our suppliers to act in accordance with applicable law and address any necessary corrective actions may result in MBDA UK terminating its contract with the relevant supplier.

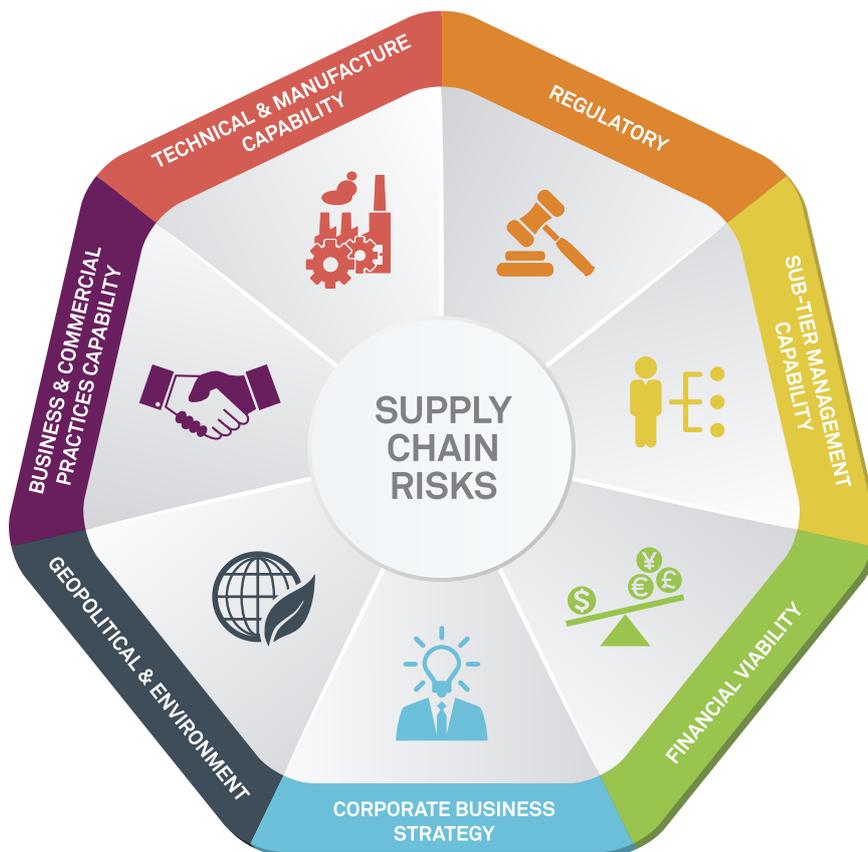
MBDA Group has produced a procurement handbook to act as a template and guide when negotiating supplier contracts (the 'Procurement Handbook'). A team made up of legal and commercial representatives from across the MBDA Group (including MBDA UK) meet on a quarterly basis to review and update the Procurement Handbook. The meetings are a forum to discuss supply chain best practice, any legislative developments and propose amendments and improvements to the clauses and guidance within the Procurement Handbook. A key focus of those meetings across the current statement period was modern slavery and related developments in the UK and the EU.

“ We rely on our international supply chain, which spans across multiple tiers, in order to manufacture our products and meet our customer requirements. ”

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## OUR SUPPLIER RISK ASSESSMENT 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, as appropriate. All of our active suppliers are subject to continued monitoring throughout their lifecycle contract with MBDA UK.

MBDA UK did not find any International Labour Organization (ILO) indicators of forced labour within the statement period. This will be continually monitored within the next statement period.

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## TRAINING AND AWARENESS OF MODERN SLAVERY

We remain committed to increasing our employees' awareness of modern slavery 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 & Compliance. On joining MBDA UK, all employees are required to attend this mandatory session (which has continued to be run remotely during the current COVID-19 pandemic), 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.

## GOALS AND EFFECTIVENESS IN COMBATING MODERN SLAVERY

MBDA UK has the following goals in relation to modern slavery and human trafficking:

1. To ensure that modern slavery and human trafficking continues to have no place within the MBDA Group 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. Business ethics and supply chain risk management form key parts of that review – 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 & Corporate Responsibility who are responsible for defining, implementing and updating relevant policies and procedures to ensure the highest ethical standards within the MBDA Group and its supply chains are maintained; and
- MBDA UK has its own National Compliance Officer who reports to the Managing Director of MBDA UK. As such, any issues detected concerning modern slavery are dealt with at the highest level within the MBDA Group.

This statement has been approved by the Board of MBDA UK Limited.



Chris Allam  
Managing Director MBDA UK & Executive Group Director Engineering

*MBDA helping to tackle slavery and human trafficking in our industry. Find out more at <https://www.gov.uk/government/collections/modern-slavery>*