

2017 Anti-Slavery and Human Trafficking Statement

In compliance with Section 54 of the Modern Slavery Act 2015, this statement sets out the steps Cobham has taken during the financial year [ending 31 December 2017] to *ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business*¹. The statement covers Cobham Group companies.

Cobham's Organisational Structure, Business and Supply Chains

Cobham offers technologies and services across defence, aerospace and space markets. In 2017 the business continued to operate in four Sectors supported by Head Office Executive and Functional management:

Cobham Advanced Electronic Solutions (CAES) provides critical solutions for communication on land, sea, in the air and in space through off-the shelf and customised products including radio frequency, microwave, and high reliability microelectronics, antenna subsystems and motion control solutions. CAES primarily operates from the USA with small operations in Mexico, Sweden and the UK.;

Cobham Communications and Connectivity (CCC) provides high performance equipment and solutions to enable reliable connectivity across a range of demanding environments in aerospace, avionics, satellite and radio, wireless and mobile connectivity markets. CCC has operating locations in Denmark, Finland, France, South Africa, Sweden, UK and USA. Smaller product development and sales operations are based in China, Germany, India, Ireland, Japan, Russia, Singapore and the United Arab Emirates;

Cobham Mission Systems (CMS) provides safety and survival systems for extreme environments, aerial refuelling systems and wing-tip to wing-tip mission systems for fast jets, transport aircraft and rotorcraft. CMS has operations in the UK and USA;

Cobham Aviation Services (CAvS) delivers outsourced aviation services for customers worldwide, including military training, special mission flight operations, outsourced commercial aviation, including fly-in, fly-out services to the natural resources industry and aircraft engineering. The main operations are in Australia and the UK with smaller sites in Bahrain, Brunei, Cyprus, Dutch Antilles, Kenya, Papua New Guinea, Trinidad & Tobago and Qatar. With the exception of Australasia operations, the majority of the Sector's operations are attached to military services and co-located on military bases.

Cobham employs about 11,000 people primarily in the USA, UK and Australia. Technology operations design, assemble, test and service Tier 1 platforms/fully integrated systems, Tier 2 major subsystems, Tier 3 integrated assemblies and Tier 4 components. The majority of manufacturing is outsourced. Global operations and supply chains are highly complex. Cobham has over 12,000 suppliers and other commercial third-party relationships.

Codes and policies

Cobham has issued an Anti-Slavery and Human Trafficking Policy (the "Policy") requiring the implementation of systems and controls to manage modern slavery risk in operations and supply chains. The policy applies to all persons working for the company or on its behalf in any capacity including the supply chain. It covers expectations for employee, operations and third party due diligence; communication and training; and reporting of modern slavery concerns or suspicions.

Cobham's [Code of Business Conduct](#) (the "Code") also specifically references Cobham's approach to antislavery and human trafficking.

Employees can raise concerns or suspicions on slavery or human trafficking to a supervisor or manager. They can also speak to Human Resources, an Ethics and Compliance Officer or contact the Cobham Helpline, which is operated by an independent third party ("Helpline") and where reports may be submitted anonymously. Every report submitted is assessed and investigated. There were no reports of slavery or human trafficking in 2017.

¹ [Transparency in Supply Chains](#) etc. A practical guide. Guidance issued under section 54(9) of the Modern Slavery Act 2015 section 2.3.

Cobham has published a [Supplier Code of Conduct](#) (the "Supplier Code") providing guidance for suppliers and those wishing to work with Cobham in the future. The code covers expectations for supplier due diligence of their own operations and supply chains to ensure they are free from slavery and human trafficking.

Risk assessment and due diligence

A prioritised, risk-based due diligence approach has been developed for both internal operations and global supply chains. The approach assesses recruitment practices, geographic risk² and industrial sector risk³ against relevant legislation.

The Human Resources (HR) function is responsible for identifying potentially high risk operations. In 2017 all BUs completed a risk assessment:

- Cobham operations, depending on their location and contract provisions, were required to comply with the UK Modern Slavery Act 2015, California Transparency in Supply Chain Act 2010 and United States Federal Acquisition Regulation clause on Combating Trafficking in Persons.
- Cobham operated in several sectors identified as high industrial sector risk including computer and electronic product manufacturing, electrical equipment, appliance and component manufacturing, and commercial air services.
- Cobham operated in high risk locations including small operations China, India, Russia and the United Arab Emirates, Helicopter services in Bahrain, Brunei, Cyprus, Qatar and Trinidad and aircraft charter services in Papua New Guinea.

The Procurement function is responsible for assessing global supply chain risk. Cobham initiated supply chain due diligence in 2017 through a third party compliance software. All suppliers were entered into the system and screened for high risk locations and sectors. Potentially high risk suppliers were requested to complete an anti-slavery and human trafficking risk template.

Training

An Anti-Slavery and Human Trafficking training course was made available on Cobham's online learning portal in English and French. This was rolled out to employees and included in new employee inductions. Over 97% of employees have completed the training to date.

More detailed training on Anti-Slavery and Human Trafficking Policy requirements is also offered to functions directly responsible for policy implementation (i.e. human resources, procurement, contracts and commercial).

Suppliers are able to access educational resources on human trafficking which are provided as a free service through our third party provider supplier compliance management tool.

Signed:



David Lockwood
Chief Executive
2018

² US State Department annual Human Trafficking Report and the Global Slavery Index Country rankings

³ Verite report on Strengthening Protections against Trafficking in Persons in Federal and Corporate Supply Chains sector analysis.