

2019 Anti-Slavery and Human Trafficking Statement

This statement constitutes the slavery and human trafficking statement for the Cobham group ("Cobham") for the financial year ended 31 December 2019 pursuant to Section 54 of the Modern Slavery Act 2015. It confirms our position in respect of such matters and highlights the steps we have taken to ensure that there is no slavery or human known to be taking place within Cobham or its supply chains.

Organisational Structure, Business and Supply Chains

Cobham offers technologies and services across defence, aerospace and space markets.

In 2019 the business continued to operate in four Sectors supported by Head Office Executive and Functional management:

Cobham Advanced Electronic Solutions: 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.

Cobham Communications and Connectivity: 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.

Cobham Mission Systems: 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.

Cobham Aviation Services: 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.

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 was updated in 2018 and 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 also specifically references Cobham's approach to anti-slavery 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 champion or contact a helpline service, which is operated by an independent third party and to which reports may be submitted anonymously. Every report submitted is assessed and investigated. There were no reports of slavery or human trafficking in 2019.

Cobham has published a Supplier Code of Conduct providing guidance for suppliers and those wishing to work with Cobham in the future. The code covers expectations for supplier due

diligence of a supplier's 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 risk) and industrial sector risk against relevant legislation.

In 2018, all business units completed a risk assessment, the results of which included the following:

- 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 having 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 in China, India, Russia and the United Arab Emirates, with helicopter services in Bahrain, Brunei, Curacao and Cyprus, and aircraft charter services in Papua New Guinea.

During 2018 HR risk assessments across the Group were reviewed to understand and validate reported processes and controls. As a result, several businesses took steps to strengthen recruitment and background checking processes.

Cobham initiated supply chain due diligence in 2017 through third party compliance software. All suppliers were entered into the system and screened based on level of spend, high risk locations and high risk sectors. Screened suppliers identified as potentially high risk were requested in the autumn of 2018 to complete an anti-slavery and human trafficking risk template.

Training

An Anti-Slavery and Human Trafficking training course is available on Cobham's online learning portal in English. It was rolled out to all employees in 2017 and from 2018 was included in new employee induction training.

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.

This statement was approved by the board of directors on [] 2020.

Signed:

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Director
Cobham Limited