

COBHAM LIMITED

2021 Anti-Slavery and Human Trafficking Statement

Introduction

This statement constitutes the slavery and human trafficking statement for the Cobham group (“Cobham”) for the financial year ended 31 December 2021 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 trafficking 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 2021 the business continued to operate in the following four areas of business, supported by a central head office and management team:

1. 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.
2. Cobham Communications and Connectivity: comprising Aerospace Communications (innovating the control and communications technology on which aircraft depend), Electrical and Electronic Equipment (which produces high performance solutions to the most challenging environments from deep space to the depths of the oceans, specialising in slip rings, rotary joints and microwave systems), and SATCOM (which provides satellite and radio communication terminals that perform in the most challenging and remote environments on land and at sea).
3. 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.
4. Cobham Aviation Services Australia: combines superior performance, extensive aviation knowledge and advanced technology to provide specialist aviation solutions to defence, government and commercial customers in Australia.

During 2021, Cobham Mission Systems was disposed, as was a significant part of Cobham Electrical and Electronic Equipment, comprising the group’s Slip Rings business.

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 within the group supply chain. It covers expectations for employee, operations and third party due diligence, communication and training and reporting of modern slavery concerns or suspicions.

The Code of Business Conduct adopted by all Cobham businesses 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 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 received in 2021.

Cobham's businesses maintain 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.

All Cobham businesses are required to make an annual certification in relation to compliance with the matters described in this statement.

Following the implementation of the UK Modern Slavery Act 2015, 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 with appropriate action being taken where potentially high risk suppliers were identified.

Training

An Anti-Slavery and Human Trafficking training course is available to employees: 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.

Approval of this statement

This statement was approved by the board of directors on 21 February 2022.

Signed:



Sven E Lewis
Director
Cobham Limited