



## **Modern Slavery Statement**

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Mettis Aerospace Ltd.'s modern slavery statement in accordance with the UK Government single reporting deadline mandatory requirement.

Modern slavery is a crime and a violation of fundamental human rights, which takes on various forms such as slavery, subjection, labour exploitation and human trafficking collectively referred to as 'modern slavery' in this statement. In common, all these are the deprivation of a person's liberty by another so to exploit them for personal or commercial gain.

Mettis Aerospace is committed to ensuring that relationships and all business dealings are carried out with full compliance to the guidelines of relevant laws and endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

Mettis Aerospace have a zero-tolerance approach to the exploitation of modern slavery in any form.

### **Our Organisation**

Mettis Aerospace Ltd is the parent company, with our head office located in the United Kingdom.

For over 80 years, Mettis has been at the forefront of aerospace forging, machining and assembly, producing an extensive range of products for all leading and next generation aircraft programmes.

We are proud to produce components that help to safeguard our country and have wide-ranging capabilities. Our products are precision-engineered and meet exacting standards.

We produce a range of components for specialist applications using a variety of materials to meet the forging, machining and assembly requirements of multiple sectors including helicopter, rail, marine and medical.

### **Our Supply Chain**

Mettis Aerospace operates autonomously and holds responsibility for management of their respective supply chains. We both source materials and sell into markets globally.

We recognise that slavery has been linked to certain raw materials commonly used in our industry, such elemental or mineral mining. We work diligently to ensure that materials linked to exploitation do not enter our supply chain and we are committed to ensuring transparent trading, alongside our approach to tackling modern slavery throughout all our supply chains.

Our organisation is built on clear values of mutual respect and equality, with all our stakeholders.

## **Our Policies**

Mettis Aerospace have implemented the following policies, procedures and agreements which form part of our approach to mitigate against the risk of modern slavery within our own organisation or our supply chain:

- Supplier Code of Conduct
- Procurement Policy
- Anti-Bribery Policy
- Grievance Policy and Procedure
- Dignity at Work Policy which includes Anti-Harassment, Diversity and Inclusion

## **Awareness and training**

We are laser focused on raising awareness and training our employees to recognise and report any suspicions they have regarding modern slavery and its potential impact on the organisation.

We ensure that as part of the onboarding process all staff are made aware of our Code of Conduct, the Anti-Modern Slavery Statement and supporting policies. Mettis Aerospace's leaders have responsibility for providing adequate and regular training to employees and contingent workers to ensure a high level of understanding of the risks of modern slavery occurring in their organisation and supply chains.

## **External Stakeholder Communication**

Mettis Aerospace expects the same high standards from all its suppliers, contractors, and any other associated business partners or stakeholders. We are committed to communicate to our external stakeholders via the following means:

- In commercial contracts and purchasing documentation
- When adding/pre-qualifying suppliers to its approved suppliers list
- When conducting audits or visits at supplier sites
- Via the Supplier Code of Conduct

This code reinforces the responsibility for ensuring that suppliers and other partners operate with integrity and to high ethical standards.

Suppliers, contractors and business partners to Mettis Aerospace must comply with all laws and regulations applicable to their organisation, including the local laws and regulations of all the countries beyond their jurisdiction in which operations are managed or services are provided.

### **Contracts**

- Mettis Aerospace are duty bound to inform our suppliers and contractors that we have a zero-tolerance approach to the practice of modern slavery, child labour, trafficked, bonded or compulsory labour in any forms.
- Standard supplier contracts include the right to terminate in the event that we find, or have reasonable grounds to suspect, that any form of forced or involuntary labour, including but not limited to modern slavery, is being used.
- Where our negotiation position does not enable us to use our contractual terms, we always look for similar clauses in the supplier's terms and conditions or we ask for them to be included.
- Mettis Aerospace's procurement team has been asked to report instances where they are unable to get suppliers to agree to such terms prior to signing agreements and we seek either alternative suppliers or ways to reassure ourselves that such organisations are acting ethically using an enhanced program of due diligence.

### **Measuring Effectiveness**

Mettis Aerospace measure the effectiveness of this policy statement within the organisation's supply chain as we work towards ensuring we have complied fully with:

- Business compliance with the Modern Slavery and Human Trafficking Policy
- A rolling refresh of business risk assessments to ensure any changes in the profile of supply chain risks are reviewed, assessed, and appropriately managed
- Review of the terms and conditions and purchasing documentation with suppliers
- Review of due diligence processes adopted and ensure training cadence is adhered to
- Commitment to audit a minimum of ten key suppliers at least every two years

- Recording and monitoring modern slavery incidents, if any, within Mettis Aerospace supply chains and, where necessary, developing corrective measures
- All applicable new contracts have contractual provisions relating to the prevention of modern slavery
- Actions regarding legal compliance, best practice and improvements are to be reviewed, recorded and monitored by Mettis Aerospace's ESG committee

### **Review and responsibility**

The Mettis Aerospace Ltd Board of Directors has overall responsibility for ensuring that this modern slavery statement complies with our legal and ethical obligations and that it is reviewed and published on an annual basis.

That their organisation has in place systems to identify and assess potential risks of modern slavery both in their organisation and their supply chains; mitigate the risk of modern slavery occurring in their organisation and supply chains; and monitor potential risk areas in their organisation and supply chains.

Ensure legal compliance regarding terms and conditions of purchase and associated purchasing documentation forbidding the use of modern slavery practices are adopted by their organisation with the right to terminate a relationship with a supplier if issues of non-compliance are discovered and/or non-compliance is not addressed in a timely manner.

The Executive Leadership Team is responsible for raising awareness and implementing the policies supporting this statement.

The devolved procurement teams and the internal audit function have responsibility for implementing this policy statement and monitoring its effectiveness at individual company level.

### **Actions**

During the next reporting period commencing 1 January 2025 ending 31<sup>st</sup> December 2025 we plan to:

- Review our Supplier Code of Conduct ensuring that its existing rigour is fit for purpose and, in the event of supplementary expectations, that they are flowed down to suppliers and the broader supply chain.
- Implement an independent, anonymous, and confidential reporting platform to suppliers to enable them to ask questions and report concerns they believe are a violation of the Supplier Code of Conduct.

- Continue to monitor our modern slavery supply chain risks and provide guidance where necessary.
- Roll-out and record ongoing training to raise awareness of modern slavery and our zero tolerance policy
- Continue to screen new suppliers and audit existing suppliers to ensure compliance with prevailing legislation in the countries where Mettis Aerospace and their supplier/s operate
- Determining and maintaining acceptable procedures for supplier pre-qualification
- Ongoing assessment of modern slavery risks based on high country risks and high sector risks
- Providing forums for discussing and recording when occurrences of modern slavery are identified, if any, and determining actions to prevent future occurrences
- Developing and introducing training in identifying modern slavery across the supply chain for relevant employees and contingent workers
- During the supplier on-boarding process, we will ask suppliers and subcontractors to complete new questionnaires to include questions around the minimum age of their workers, adherence to labour laws, adoption of living wages (where applicable) and adherence to modern slavery legislation or its equivalent. Where necessary we supplement questionnaires with third-party checks using risk intelligence data.

**For and on behalf of Mettis Aerospace Ltd**



**Martin Whittaker**  
**CEO**