



LEONARDO MW LTD

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Leonardo MW Ltd (the "company") has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chain.

The company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the company expects that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the company or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. The company may amend this policy at any time.

2. RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring this policy complies with the company's legal and ethical obligations, and that all those under its control shall comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3. COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the company's business or its supply chains is the responsibility of all those working for it or under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager (or your usual point of contact within the company if not an employee) OR call the company's "Speak Up" confidential helpline as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the company's business or its supply chains at the earliest possible opportunity, even if you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the company's supply chains constitutes any of the various forms of modern slavery.

The company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company Grievance Procedure, which can be found in the employee handbook.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk the company faces from modern slavery in its supply chains, will be provided as necessary. The company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

Whilst this policy does not form part of any employee's contract of employment, any employee who breaches this policy will face disciplinary action, which in the most serious of cases could result in dismissal for misconduct or gross misconduct. The company may terminate its relationship with other individuals and organisations, including suppliers, working on its behalf if they breach this policy.