

# LOCKHEED MARTIN UK POLICY ON SUPPLY CHAIN TRANSPARENCY CONCERNING MODERN SLAVERY AND HUMAN TRAFFICKING

## Statement Applicability

Lockheed Martin UK Holdings Limited (LMUK) is a wholly owned subsidiary of Lockheed Martin Corporation headquartered in Bethesda, Maryland, US. This statement is applicable to the following LMUK companies:

- Lockheed Martin UK Limited
- Lockheed Martin UK Ampthill Limited
- Lockheed Martin UK Strategic Systems Limited
- Lockheed Martin Helicopter Company Limited

While this statement is applicable to the above companies incorporated in the UK, it should be noted that Lockheed Martin Corporation, LMUK's parent company, has corporate anti-trafficking policies, a summary statement in relation to which can be found on the Lockheed Martin Corporation web site and it and its subsidiaries including those that may have some business connections with the UK are required to comply with those policies.

Section 54 of the Modern Slavery Act 2015 requires commercial organizations to disclose **their**

among others. LMUK requires as a condition of contract that all suppliers agree to comply with all applicable laws and regulations.

### Evaluation of Supplier Compliance/Audits

LMUK has introduced enhanced policies and practices to manage the risk of MDS, these measures include:

- 1) Acquisition procedures have been updated to introduce a formal risk management approach, which categorises each supplier as Low, Moderate or Enhanced. It further introduces enhanced due diligence for Moderate or Enhanced risk suppliers including requiring details of approaches and techniques applicable to lower tier suppliers.
- 2) LMUK require that all bidders into new procurements confirm that they take measures to mitigate any potential for MDS to occur and for any Moderate or Enhanced risk details of the policies and procedures followed by suppliers with their internal teams and with their suppliers.
- 3) LMUK now make it a formal condition of contract that all vendors awarded contracts have confirmed that they are cognizant of and take suitable measures to prevent MDS occurring.
- 4) LMUK will extend the training of staff on MDS to all LMUK staff rather than just those engaged in Supply Chain Management activities. The latest training also blends in awareness of other nations' requirements such as the US Trafficking in Persons legislation.
- 5) Recruitment and engagement of staff and contractors has been reviewed to ensure that all MSA related HR policies can be mapped to LMUK processes and procedures.

Whilst not publicly available all internal policies can be made available for review by HMG / MoD departments upon request, provided reasonable notice is given.

In addition, LMUK maintains an ethics helpline at (US) 1-800-LM-ETHIC (when calling from outside the U.S., first dial the origin country's exit code). Anyone who observes conduct contrary to the principles set forth in Lockheed Martin's "\_\_\_\_\_ " may call the Ethics helpline number that is included in all supply contracts. LMUK promptly investigates all reported matters and takes action as needed, including disclosure to governmental authorities as appropriate. LMUK staff can also raise any concerns or report any issues to ethics and legal staff based in the UK.

### Supplier Certification

LMUK requires as a condition of contract that all suppliers commit to comply with applicable laws and regulations but does not require suppliers to certify expressly that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

LMUK has also established a \_\_\_\_\_ that communicates the core principles to which LMUK expects its suppliers to adhere. The \_\_\_\_\_ includes the following provisions:

LMUK expects its suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture.



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