

## **Chelton 2020 Anti-Slavery and Human Trafficking Statement**

### **Introduction**

This statement constitutes the slavery and human trafficking statement for Chelton Limited ("Chelton") 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 Chelton or its supply chains.

### **Organisational Structure, Business and Supply Chains**

Chelton offers technologies and services across defence, aerospace and space markets related to aerospace communications (innovating the control and communications technology on which aircraft depend).

### **Codes and Policies**

Chelton 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 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 Chelton businesses also specifically references Chelton'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 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 2020.

### **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. Chelton is required to make an annual certification in relation to compliance with the matters described in this statement.

### **Training**

An Anti-Slavery and Human Trafficking training course is available to employees and 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 Chelton President on 25 October 2021.

Signed:   
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Jason Abbott  
President, Chelton Limited