



## Modern Slavery Transparency Statement 2021

This statement relates to Babcock International Group PLC, covering all business regions, operating companies and business units throughout the world, including wholly owned and partly owned subsidiaries. The statement relates to the financial year ending 31 March 2021.

At Babcock we are committed to conducting our dealings, whether with customers, suppliers, employees or the communities in which we are based, with the utmost integrity and as such we are steadfast in our support for the elimination of modern slavery in all its forms. All our businesses, wherever they are located and wherever they have dealings in the world, are required to respect people and to value their diversity.

Our aim is to create an inclusive organisation where everyone's skills and contributions are welcomed and valued. This approach is enshrined in our Babcock Code of Conduct.

Modern slavery falls within the governance pillar of our ESG programme, more information about which can be found in our Annual Report and on our website ([www.babcockinternational.com](http://www.babcockinternational.com)).

While we continue to believe that due to the nature of our business our exposure to the risk of human rights abuses and modern slavery is low within our own business and supply chain, we welcome the opportunity to contribute positively to global efforts to ensure that human rights are understood and observed. This document explains the steps Babcock is undertaking to prevent, detect and respond to modern slavery within our business and supply chains. It has been approved by the Board of Babcock International Group PLC and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.

**David Lockwood**

**Chief Executive Officer for and on behalf of Babcock International Group PLC and group companies  
May 2021**

Relevant companies for the purposes of section 54(2) of the Modern Slavery Act 2015:

Babcock Aerospace Limited  
Babcock Airports Limited  
Babcock Communications Limited  
Babcock Critical Services Limited  
Babcock Integrated Technology Limited  
Babcock Land Limited  
Babcock Land Defence Limited  
Babcock Marine (Clyde) Limited  
Babcock Marine Training Limited  
Babcock Mission Critical Services Offshore Limited  
Babcock Mission Critical Services Onshore Limited  
Babcock Networks Limited  
Babcock Rail Limited  
Babcock Support Services Limited  
Babcock Training Limited  
Babcock Vehicle Engineering Limited  
Cavendish Nuclear Limited  
Devonport Royal Dockyard Limited  
Rosyth Royal Dockyard Limited

## 1. Structure, business and supply chain

Our business is principally involved in the delivery of critical, complex engineering services, which support national defence, save lives and protect communities. We operate in three key markets: Defence; Aerial Emergency Services and Nuclear, through four sectors: Marine, Nuclear, Land and Aviation, providing services to pre-dominantly governmental or blue chip customers, approximately 90% of whom are located in the UK, Europe, North America, Australia or New Zealand.

External expenditure via third-party suppliers, including Original Equipment Manufacturers (OEMs), accounts for a significant part of our turnover and our approach and ability to manage these relationships affects our ability to deliver performance and margin. Our procurement and supply chain function develops and delivers supply chain solutions, which enable us to return value to our customers, shareholders and communities. We buy a wide range of goods and services from around 14,000 suppliers. These range from OEM's to Small and Mid-size Enterprises (SMEs). Of these suppliers, approximately 300 are key partners in our ability to deliver continuous improvement and innovative quality outputs.

## 2. Slavery and human trafficking policies

As an international business, we recognise our responsibility for upholding and protecting the human rights of our employees and other individuals with whom we deal throughout our supply chain and in our operations across the world.

We believe that we have embedded a culture of respect for human rights throughout our business which is demonstrated by our commitment to ethical conduct in everything we do. Additionally our [Babcock Code of Business Conduct policy](#) which summarises our commitment and compliance with this policy is mandatory for all employees, business advisers and business partners. We expect the same commitment from our suppliers and for them to flow down that commitment through the Supply Chain.

The [Babcock Supplier Code of Conduct](#), which we review annually, describes the Company's expectations of all suppliers doing business with Babcock. In addition to communicating Babcock's values, it mandates full compliance with all laws and regulations. It also addresses the proper handling of intellectual property and other sensitive data, health, safety and environmental concerns as well as Human Rights including Modern Slavery.

This Group-wide Supplier Code of Conduct provides clarity about our expectations of methods used to deliver environmental and social responsibility. The code reflects the same standards that we hold ourselves to and enables a consistent approach to our customers in delivering to the highest ethical standards.

### Supplier Code of Conduct:

Our suppliers should either be willing to subscribe to our Code or confirm they have equivalent standards and procedures in their own businesses.

### Key Areas

#### Our People

- Inclusion and diversity
- Dignity and respect
- Human Rights
- Modern Slavery

## **Our Business**

- Anti-bribery and corruption
- Gifts and hospitality
- Conflicts of interest
- Anti-trust and competition

## **Our World**

- Health and safety
- Environment
- Community engagement

## **Our Assets**

- Intellectual property
- Confidential information
- Cyber security

## **Our Due Diligence**

### **Whistleblowing**

### **3. Due diligence procedures**

We continue to deploy our modern slavery risk assessment via our due diligence toolsets for new and existing suppliers.

This due diligence toolset assists with supply chain awareness and facilitates measurement of supplier mitigation activities relating to modern slavery. We review this toolset on an annual basis.

Our businesses use appropriate processes to qualify, on-board and periodically revalidate suppliers to ensure compliance with commercial, regulatory and legal requirements.

We explain the qualification process to our suppliers in our Procurement & Supply Chain functional principles and sector specific policies. The level of detail gathered from the supplier is appropriate to the type of supply.

### **4. Identifying, assessing and managing risk**

We continue to believe that our exposure to the risks of modern slavery is low within our own business and supply chain.

This assessment is under continuous review so that we can determine if circumstances change that require us to take additional actions. We work in collaboration with other industry leaders to create a process that optimises risk management whilst encouraging the use of SMEs. Babcock requires all potential suppliers to demonstrate their capacity to meet our contractual requirements. We also look for a clear demonstration of commitment to corporate social responsibility. We expect high standards of conduct from our suppliers in what they will do either for us or for our customers. We will not accept any behaviour contrary to our codes.

## **5. Effective action taken to address modern slavery**

We have not identified any instance of modern slavery during the year across our supply chain.

## **6. Training and awareness**

We continue to raise awareness of Modern Slavery within our procurement and supply chain function. As procurement professionals, we understand what modern slavery is, what the key identifiers are and how proactively to address and manage this risk.

We have clear principles which are set out in our Code of Conduct which are freely available on the intranet and the website.

We also display information about a confidential and independent whistleblowing line that can be used for reporting breaches of the codes of conduct at all our sites and host the Whistleblowing policy on the home page of our group intranet site which includes contact numbers for the lines relevant for all countries and alternative methods for raising concerns internally.

Our Modern Slavery Awareness modules remain available to our UK based and International colleagues within all functions of Babcock

Amongst other related issues, these modules highlight high-risk sectors where additional care may be needed when on-boarding suppliers. They also highlight the due diligence processes we mandate the use of and the indicators of forced Labour as well as information about our independent whistleblowing hotline.

We host these mandated modules for key procurement personnel on our internal learning management system where we can track completion. We have also hosted an extended selection of modules and resources on our dedicated Modern Slavery internal webpages so anyone within the organisation can complete them. This page also contains a selection of links, which explain the current legislation, Babcock policy and internal escalation points. They also point to external training modules for those who wish to deepen their understanding of the issues.

This year we also shared the full report of the Independent Slavery Commissioners review into Operation Fort with our sector Procurement Directors so they could ensure relevant learning reached the correct teams. This is in addition to highlighting the report to our Group Recruitment procurement team so they can also identify any improvement and / or mitigation actions. The report was hosted on our dedicated internal Modern Slavery pages for the wider business to be able to access if they choose. Modern Slavery articles have also been featured in our internal functional newsletters to keep the awareness high outside of the training.