

SSTL Modern Slavery & Human Trafficking Statement

Doc No: HR034

Revision: 003 Status: Released

Release Date: 30/06/2019

Page 1 of 2

Uncontrolled when printed

SSTL Modern Slavery and Human Trafficking statement

Introduction from the Group Managing Director

Surrey Satellite Technology Ltd is committed to improving our practices to combat slavery and human trafficking. We have a zero-tolerance approach to modern slavery and we strive to act ethically and with integrity in all of our business dealings and relationships to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains. This is our third statement and relates to actions and activities between 1 January 2018 and 31 December 2018.

Organisation's structure

We have been delivering small satellite missions for over 30 years, longer than anyone else in the world, giving us the experience to justify our reputation as the world's premier provider of operational and commercial small satellite programmes.

In 2009 Airbus bought a 99% shareholding from the University of Surrey, and SSTL Ltd is now an independent company within the Airbus Defence and Space group. We are governed by a Board of Directors overseeing our Directors who manage our 500 staff across two sites.

Our policies on anti-slavery and human trafficking

SSTL operates certain policies that support our commitment to identify modern slavery risks and take the necessary preventative steps to ensure there is no slavery or human trafficking in our operations as follows:

- Whistleblowing Policy we encourage all our employees, workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the company. This includes any circumstances that may give rise to the risk of slavery or human trafficking. Our Whistleblowing policy is designed to make it easy for all parties to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact any member of the leadership team, SSTL's Compliance Officer or the Managing Director. Or he or she may make use of the "OpenLine" system put in place by our shareholder, Airbus either by telephone on 0800 27 00 00 07 or through the OpenLine website: www.airbusopenline.com
- Recruitment/Agency Workers SSTL only uses agencies employed on our preferred supplier list (PSL) to source workers and always verifies the practices of any new agency it is using before accepting workers from that agency.

SSTL requires its suppliers to comply with our policy, or have their own policy on anti-slavery and human trafficking, which includes specific prohibitions against the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude (whether adults or children), and we expect that our suppliers will hold their own suppliers to the same high standards. Any failure by a supplier to meet the standards set out in this statement will be a breach of contract and may result in the termination of our relationship with them.



SSTL Modern Slavery &
Human Trafficking Statement

Doc No: HR034

Revision: 003 Status: Released

Release Date: 30/06/2019

Release Date. 30/0

Page 2 of 2

Uncontrolled when printed

We recognise the importance of maintaining constant vigilance to identify and address any issues associated with slavery and human trafficking in SSTL and throughout our supply chains. We are committed to continuing to enhance our capacity to identify, prevent and mitigate any actual or potential risks in these areas and in 2018 we have implemented terms of supply to specifically incorporate clauses relating to modern slavery and human trafficking by:

- Adding a Modern Slavery clause to all major subcontracts agreements to comply with the law
- Incorporated Modern Slavery policy in to SSTL General Terms and Conditions of Purchase and thus applied to all purchase orders.
- Issued a new supplier evaluation form that requested confirmation from the supplier that they have their own policy on anti-slavery and human trafficking, or compliance with our policy in absence of their own
- Established a Strategic Modern Slavery Working Group to strengthen governance and move from the phase of building transparency and process, to longer term planning.

Training

Last year (2017) we briefed key employee groups across the company who are involved in aspects of the supply chain through the course of their roles. These specific groups were Procurement, Facilities, Subcontracts, Commercial and HR.

This year we have explored potential avenues in order to brief the wider employee network and will aim to complete in 2019 via E-learning as part of our Ethics and Compliance commitments.

Future actions

Moving forward into 2019 we will review our Modern Slavery Working Group following a Company-wide restructure and ensure the Working Group is expanded to include other areas of the business identified as being able to contribute to its identification and eradication.

We will also ensure the Procurement Team are positioned to lead the activity with the SSTL supply chain and will undergo the CIPS/Walk Free Foundation and Traidcraft eLearning course on CIPS Ethical Procurement & Supply.

This statement has been approved by the Board of Directors and is signed by Sarah Parker, the company's Managing Director. This statement will be reviewed and updated annually.

Signed

Sarah Parker Managing Director, SSTL