

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR THE YEAR 1 JANUARY TO 31 DECEMBER 2025

This statement is issued on behalf of Leonardo UK Ltd (Leonardo UK) pursuant to section 54 of the Modern Slavery Act 2015 (the Act) and was approved by the Leonardo UK Board on 22 April 2026. Internal stakeholders engaged in the development of this statement include Indirect Procurement, Direct Procurement across all UK Divisions, Legal & Corporate Affairs, and Sustainability. It constitutes our Modern Slavery and Human Trafficking statement for the financial year ending 31 December 2025, setting out the measures Leonardo UK takes to prevent Modern Slavery and Human Trafficking in our business and supply chain. Leonardo UK operates in the United Kingdom and we are committed to responsible business conduct and fully support the principles of the Act to proceed in an ethical, sustainable manner.

As stated in the Leonardo [Charter of Values](#).

*Leonardo Group upholds and promotes human rights in every context in which it operates by creating equal opportunities for its people and fair treatment for all – regardless of race, nationality, political creed, religion, gender, age, diverse ability, sexual orientation, personal or social condition – and always respecting the dignity of each individual and of each employee; among other things we promote the inclusion of minorities, ensure freedom of assembly and **abide by the absolute prohibition of illegal labour**.*

LEONARDO IN THE UK

Leonardo UK operates from 9 main sites in the UK (Basildon, Bristol, Edinburgh, Luton, Lincoln, London, Newcastle, Southampton and Yeovil) employing more than 9000 highly skilled people in 2025. The company makes a significant contribution to the UK economy with an annual revenue of over £2bn, around 50% of which are exports. Our position in the UK as a world-class advanced engineering company is built on sustained investment in research and technology, state of the art facilities, the expertise of its engineers and our commitment to the highest principles of sustainability and ethics. Leonardo UK invests significantly in Research & Development in the UK and continues to help sustain the competitive edge of our UK supply network of around 2,300 businesses. Our procurement activities are structured with Indirect Procurement operating as a central, cross-UK function, and Direct Procurement operating within each of the UK Divisions.

GOVERNANCE AND POLICIES

Leonardo UK is governed by a UK Board of Directors, which is responsible for all regulatory, corporate and commercial matters. Responsibility for the oversight of our most significant non-project/contract risks has been delegated by the Board to the Assurance and Internal Controls Committee (“AICC”), a UK Committee made up of senior management from Divisions and the Legal function. Operational Assurance Statements prepared by senior management and non-financial risk registers, including Modern Slavery risk, are reviewed regularly by the AICC to monitor the status and progression of mitigation plans. Key risks, such as those relating to Modern Slavery, are reported to the Board on a regular basis by the AICC.

LEONARDO GROUP POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING

The foundation of Leonardo’s approach to sustainability is the commitment to conduct business responsibly at every level of the supply chain. This responsibility has many aspects, encompassing people, a large-scale supply chain and the protection of the planet. Leonardo’s commitment is inspired by the Sustainable Development Goals (SDGs) of the UN Agenda 2030, strengthened by the sustainability objectives that Leonardo has set itself and by the actions laid out in the company’s Sustainability Plan.

In line with the Group’s objectives and its [Sustainability Plan](#), Leonardo is committed to building a robust, reliable supply chain within an innovative, integrated ecosystem that supports the social and economic development of the areas where the company operates.

Leonardo commits to carry out its activities in full accordance with the human rights set out in the Group’s [Code of Ethics](#) and [Charter of Values](#).

All of Leonardo’s Group businesses, wherever they are located in the world and wherever they have dealings in the world, are required to respect people and to value their diversity. The Leonardo Group recognises the important responsibility it has to balance the interests of its shareholders, employees, customers, suppliers, and the wider community and recognises that the responsible and sustainable development of our business is a key foundation for its long-term success.

The UK Board has formally adopted this approach and commits Leonardo UK to ensuring that:

- our employees do not engage in practices and do not infringe applicable laws and regulations relating to Modern Slavery, Human Trafficking, forced labour and child labour; and
- we take all reasonable measures to ensure that our suppliers and other entities acting on our behalf do not engage in practices or infringe applicable laws and regulations relating to Modern Slavery, Human Trafficking, forced labour and child labour.

Our Supplier Code of Conduct can be found here [Supplier Code of Conduct](#).

COMPLIANCE

Leonardo UK is committed to respecting the human rights of our employees in the workplace. We contractually require our suppliers and business partners to adopt the same or similarly high standards of ethical behaviour. This includes giving guidance and support to our directly contracted suppliers and business partners in taking appropriate steps to prevent Modern Slavery and Human Trafficking occurring in our business or supply chain.

We also work with other companies in the Aerospace and Defence Sector to ensure compliance and to improve current ethical business conduct best practice. Leonardo UK is a key group member of the Aerospace and Defence industry's representative body, ADS, and its Business Ethics Network (BEN). We are also members of the ADS Human Rights Working Group, and signatories of the UK Defence [ESG Charter](#).

WHISTLEBLOWING

Compliance with our processes is the individual responsibility of each employee. Every employee has the responsibility to bring concerns to the attention of the business and is encouraged to do so. A *Leonardo UK Speak Up Helpline*, which is operated by an independent third party, is in place to enable employees, contractors, agency workers and suppliers to raise concerns anonymously. Every report is submitted to a dedicated Group team, and forwarded to the relevant leadership (for Leonardo UK, this is assessed and investigated in the UK). Anonymity is offered as a matter of course and genuine complaints are investigated promptly and thoroughly, with appropriate action taken where concerns are substantiated. For UK personnel, reports can also be submitted on the [Whistleblowing Platform](#) or by using the mailbox E&C@leonardo.com.

In addition to our *Speak Up* reporting line, a UK-wide anonymised employee engagement survey is conducted on an annual basis, providing employees with a further mechanism to raise concerns and provide feedback.

During 2025, we had no reported modern slavery incidents using the *Speak Up* helpline or applications, or to management directly or via the engagement survey.

SUPPLY CHAIN, DUE DILIGENCE AND SUPPLIER MANAGEMENT

Like other companies in the Defence, Aerospace and Security Sector, the Leonardo UK supply chain is complex, global and multi-tiered. Leonardo UK procures goods and services from a variety of suppliers in the UK and overseas. The diversity of those goods and services acquired is a product of the multiple lines of business within Leonardo UK and the global markets in which they operate. Leonardo UK also acquires significant volumes of goods and services from other parts of the Leonardo Group predominately in Europe, but also the US and Australia.

In order to deliver customer capability, Leonardo UK works closely with more than 2,000 directly contracted suppliers, spending £1.9bn worldwide. These relationships are often long lasting due to the complexity of the products and their long lifecycles and so it is critical that our suppliers share our values of responsible business. To ensure this, we monitor and manage them throughout the relationship process from initial selection through to project completion.

Geographic Location	%of total commitment
United Kingdom	58%
Italy	14%
Germany	10
Spain	8%
United States of America	6%
Rest of the World	5%

The procurement organisation deploys common policies across all the Leonardo UK businesses to enable a standard approach to be taken across core subjects including the measures to be taken in respect of modern slavery and human rights.

Leonardo UK screens all suppliers for adverse media and previous prosecutions in relation to any human rights abuses. This due diligence is undertaken either through the Leonardo Global Solutions (LGS) Supplier Qualification Portal, or the Joint Supply Chain Accreditation Register (JOSCAR) co-created with ADS.

JOSCAR requires all UK suppliers to provide confirmation of their approach to Modern Slavery through the form of a detailed questionnaire and - if applicable - the inclusion of their Modern Slavery Statement. Should a previously screened company be associated with any form of prosecution of which human rights is a part, the annual return from participating suppliers allows us to continually monitor status. This is then assessed and escalated appropriately through Leonardo UK documented processes.

As part of our zero-tolerance approach, where a part of our supply chain is found to be engaging in human rights abuses and our supplier is unable or unwilling to rectify the same, it is removed and replaced.

Prior to approving and selecting suppliers, we outline the products and services we need and establish a way to identify suppliers including Small to Medium Enterprises (SME's) and categories of procurement taking into consideration supplier location. Once we have established a short list of suitable suppliers, we undertake a risk based due diligence process against a number of non-financial risks, which includes:

- Acceptance to Leonardo UK Contracting Conditions which requires the supply chain to be compliant with the Modern Slavery Act 2015;
- Responsible Trading Principles - business ethics, anti-corruption and anti-bribery, governance and legislation;
- Human rights – working hours, harassment and unlawful discrimination, whistleblowing line, Modern Slavery, Human Trafficking and child labour;
- Health and safety – workplace and product safety;
- Environment – impact of operations and products;
- Management systems – environmental management systems certified to ISO14001 or similar environmental standards; and
- Responsible sourcing including management of conflict minerals risks.

At a Group level, Leonardo has a commitment that by 2028, >70% of all major tenders must include ESG Criteria, further strengthening supplier selection aligned to our values.

Suppliers are regularly reviewed throughout the contractual relationship and our UK General Conditions of Purchase requires all our suppliers to comply with all applicable laws and regulations including those relating to human rights, anti-slavery and the environment and, where possible, flow down the same to their suppliers. Once a supplier has been approved through the Leonardo UK on boarding process we continue to actively monitor and manage the supplier throughout the period of the relationship including ongoing risk based due diligence. If a supplier's level of risk increase, or gaps in performance are highlighted continuous performance improvement plans are put in place.

The frequency of these reviews is supplier-specific and is conducted as part of the Supplier Quality Assurance audit plan.

SUPPLY CHAIN RISK ASSESSMENT

Leonardo UK and the UK Procurement Council(s) have determined that Leonardo UK has a **low dependency** on goods and services from Suppliers that present a high risk of modern slavery.

Leonardo UK will regularly evaluate the nature and extent of its exposure to the risk of Modern Slavery occurring in its supply chain through implementation of its risk management procedures. We do not consider that we operate in a high-risk sector due to the skilled nature of our workforce and those of our direct supply chain. We do, however, assess geographical risks as we accept that exposure to modern slavery may be greater depending on the geographical location of the supplier and will consider the Transparency International Corruption Perceptions Index (CPI) and other such internationally recognised lists to aid that regional assessment.

Where Leonardo UK have identified a potential risk through our risk assessment procedures, we will explore ways of mitigating these risks through due diligence, improved procurement practices or industry collaboration. We also undertake quarterly checks and other regular actions to monitor any transactions undertaken e.g. arising out of the Leonardo Group sensitive countries list.

If Modern Slavery or Human Trafficking were found within our directly contracted suppliers, we would act immediately to work with the supplier and relevant authorities to understand the circumstances of what has been found and to put in place corrective actions that help the

affected workers and protect them from further harm. If a supplier was unwilling to address the issue, then corrective action would include termination of contracts, selection of an alternative supplier and reporting the matter to the police or other relevant law enforcement agencies in the territory.

TRAINING AND AWARENESS COMMUNICATIONS

Leonardo UK maintains regular awareness communications regarding Modern Slavery, with training seen as a priority to help reduce the risk of Modern Slavery in its operations. During the last few years, we have developed an interactive multimedia training program to raise awareness of the issue, help our staff identify the risk indicators and inform them of the correct route to report any concerns or risks they identify. During 2025 this training was reviewed and updated, and this training is compulsory for all new starters in the business. Specific training has been rolled out in 2025 to the procurement function as the demands of the business dictate to make them aware of the Act and to consider which parts of the Supply Chain from which they procure are the most susceptible risk under the Act. Other focused training may be applied to our Human Resources, Quality Assurance and Governance functions, all of whom are engaged with the supply chain and who are considered most likely to directly encounter Human Trafficking activities in the course of their work. This training must be retaken every two years.

OUR KEY AREAS OF FOCUS FOR FY 2025 WERE

Continue to maximise the use of the tools available across Leonardo to assess our supply chain in relation to ESG topics (Environmental, Social and Governance)	Ongoing
Review the content and suitability of the current training and if required amend or update it.	Complete

PLANNED ACTIVITIES WITHIN 2026

- Monitor the completion of the mandatory training for all staff
- Monitor the completion of the revised training within the Procurement function to ensure it is undertaken regularly by all staff
- Review the Leonardo UK Modern Slavery governance and associated Policies
- Continue to develop supply chain tools to better understand and mitigate supply chain risks

2026 KEY PERFORMANCE INDICATORS

- Number of our UK Employees trained in human rights and modern slavery
- Number of calls to the ethics hotline on the subject of human rights and modern slavery in our business operations or supply chain

The results of these KPIs are reviewed by senior leadership on a regular basis to monitor performance, identify areas for improvement, and inform decision-making and risk mitigation activities.

Leonardo UK will continue to review its policies and processes, for the benefit of all of our stakeholders, in order to raise standards to ensure that we operate in a demonstrably ethical and sustainable manner across our supply chains.

Leonardo UK Ltd shall continue to take a zero-tolerance approach to modern slavery and is committed to developing and strengthening its modern slavery strategy.



Clive Higgins
CEO and Chair, Leonardo UK Ltd