



**MODERN SLAVERY ACT 2015**

**SLAVERY AND HUMAN TRAFFICKING**  
**STATEMENT 2017**

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## THIS STATEMENT

This statement sets out the steps Atlas Elektronik UK Limited has taken to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business.

## OUR VALUES

Modern slavery and human trafficking is a crime and a violation of fundamental human rights. We are committed to acting ethically and with integrity in all our business dealings. Our business systems and controls mitigate the risk of modern slavery occurring anywhere in our business or in any of our supply chains.

## OUR BUSINESS

We are a UK company operating within the defence sector. Our principal activities include research and development, design, manufacture and support of maritime military systems for both the UK and export markets. We are the largest wholly owned subsidiary of Atlas Elektronik GmbH, a company headquartered in Germany and owned by ThyssenKrupp.

## OUR SUPPLY CHAINS

We purchase the majority of our products and services from suppliers in the United Kingdom. We also source materials from Germany. For the purposes of this Statement, where we state supply chains we are referring to those suppliers with whom we have a direct relationship.

## RISK ASSESSMENT

The risk of modern slavery and human trafficking within our own organisation is mitigated as a result of the nature, structure and location of our business and the strict implementation of our policies and procedures. Our risk assessment indicates that any risk of modern slavery and human trafficking would be limited to our supply chain where operations and managerial oversight are outside our direct control.

## OUR POLICIES

We are committed to ensuring that modern slavery and human trafficking does not take place in our supply chains, or in any part of our business. Many of our existing policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking. These policies include: Sustainable Procurement Policy; Whistleblowing Policy, Equal Opportunities Policy, Dignity at Work Policy and Health, Safety and Wellbeing Policy.

In addition, we have introduced a Modern Slavery Act Policy to reinforce our commitment to human rights and fundamental freedoms. This will ensure there is transparency in our own business and in our approach to addressing the risks of modern slavery and human trafficking throughout our supply chains.

## DUE DILIGENCE AND MITIGATION OF RISK

We require suppliers to undertake a qualification programme to evaluate their ability to meet our standards and their legal obligations. This programme addresses key regulatory areas including environment, employment practices and working environment, health and safety, human rights and compliance with modern slavery and human trafficking legislation. Once a supplier is accepted, they are placed on our approved supplier list. Approved suppliers are managed by a dedicated team of procurement professionals who regularly audit and visit them. Our procurement activity is centralised on one site. This allows us to achieve a high degree of consistency in the management of supplier relationships and the implementation of our supplier management programme.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, training is directed to staff working in human resources and procurement. Regular training for other staff is provided as necessary.

## AUDIT, MONITORING AND REVIEW

We achieve continuous improvement across all our business activities through audit, monitoring and review.

Our business processes associated with the mitigation of slavery and human trafficking risk are supported by key performance indicators including: the number of employees who have completed training, reporting of suspicions of modern slavery and human trafficking in our supply chain and instances of whistleblowing and grievances.

Our internal procedures are regularly audited by an independent auditor and a report submitted to senior management. In addition, our quality and assurance function regularly audits the business for compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Atlas Elektronik UK Limited's Modern Slavery and Human Trafficking Statement for the financial year ending 30 September 2017.



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Claire Evans, Director, Atlas Elektronik UK Limited

Date January 2018

