

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. THIS STATEMENT

This statement outlines the steps taken by TKMS ATLAS UK Limited to prevent modern slavery and human trafficking within our business operations and across our supply chain.

2. OUR VALUES

Modern slavery and human trafficking are serious crimes and violations of fundamental human rights. We are fully committed to conducting our business ethically and with integrity. We maintain robust systems, controls and procedures designed to mitigate the risk of modern slavery occurring within any part of our organisation or supply chain.

3. OUR BUSINESS

TKMS ATLAS UK Limited is a UK-based 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. TKMS ATLAS UK Limited is a wholly owned subsidiary of TKMS GmbH, a publicly listed German company.

4. OUR SUPPLY CHAINS

Our Supplier Code of Conduct defines the social, environmental and ethical standards expected from our supply chain partners. All suppliers are required to adhere to these principles without exception. While the majority of our products and services are procured from UK-based suppliers, our broader supply chain extends globally.

5. RISK ASSESSMENT

The risk of modern slavery and human trafficking within our organisation is mitigated due to the nature, structure and location of our operations, alongside the rigorous application of our internal policies and procedures. We actively engage with key first-tier suppliers, encouraging them to undertake similar risk assessments throughout their own extended supply chain.

6. OUR POLICIES

We are committed to ensuring that modern slavery and human trafficking do not take place in all aspects of our business supply chain activities. Our internal policies support this commitment and reflect our ethical standards and legal responsibility. These policies include:

- Whistleblowing Policy
- Equal Opportunities Policy
- Dignity at Work Policy
- Health, Safety and Wellbeing Policy

In addition, we have introduced a Code of Conduct to reinforce our commitment to human rights and fundamental freedoms. This promotes transparency within our organisation and guides our approach to identifying and addressing the risk of modern slavery and human trafficking within the supply chain.

7. DUE DILIGENCE AND MITIGATION OF RISK

All suppliers are subject to a pre-qualification process before becoming an approved supplier. This process is managed using independent platforms including Hellios (JOSCAR) and Integrity Next, which provides ongoing risk monitoring and alerts.

We assess suppliers against regulatory requirements and their ability to meet legal and ethical obligations. This includes the evaluation of:

- Environmental and sustainability practices
- Health, Safety and Working Environment
- Compliance with human rights legislation, including the Modern Slavery Act 2015

Approved suppliers are added to our Approved Suppliers List and are managed by dedicated procurement professionals. In collaboration with our Quality Assurance team, regular desk top audits are completed, and where appropriate, on-site audits.

Procurement activities are centrally managed on-site, enabling consistency in supplier relationship management, and the effective implementation of our supplier management programme.

8. TRAINING

To ensure awareness and understanding of modern slavery risks and human trafficking, targeted training is provided to employees working in human resources and procurement. Additional training is delivered to other employees as required.

9. AUDIT, MONITORING AND REVIEW

We are committed to continuous improvement through ongoing audit, monitoring and review processes. Key performance indicators supporting our approach include:

- Completion rates of relevant employee training
- Reporting and investigation of suspected modern slavery cases
- Whistleblowing reports and grievance tracking

Our internal procedures are subject to regular internal audits conducted by an independent auditor, with findings reported to senior management. In addition, our quality and assurance function regularly carries out routine compliance audits across the business.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes TKMS ATLAS UK Limited's Modern Slavery and Human Trafficking Statement for the financial year ending 30 September 2025.



Claire Evans, Chief Finance Officer, TKMS ATLAS UK Limited

Date: May 2026