

## Company Practice

# General Dynamics United Kingdom Limited: Modern Slavery and Human Trafficking Statement

### INTRODUCTION

General Dynamics United Kingdom Limited is committed to maintaining and improving its policies and systems to identify and reduce the risk of modern slavery occurring in its business or supply chains. General Dynamics UK supports and seeks to protect human rights and labour standards more widely as part of the General Dynamics Corporation Standards of Business Ethics and Conduct (the **Blue Book**).

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken in our last financial year, 1 January 2018 – 31 December 2018, with regard to modern slavery.

### OUR BUSINESS AND SUPPLY CHAINS

General Dynamics UK is part of the General Dynamics Corporation. The General Dynamics Corporation is a global aerospace and defence company, headquartered in Falls Church, Virginia – with locations in 46 countries, employing more than 98,000 people worldwide. The Corporation is a market leader in business aviation, land and expeditionary combat systems, armaments and munitions, shipbuilding and marine systems and information systems and technologies

General Dynamics UK has more than 50 years’ experience in technical leadership, manufacturing expertise and prime contract management skills to deliver C4I communication solutions, Armoured Fighting Vehicle (AFV) capability, avionics systems and deployable infrastructure. It is one of the UK’s leading defence companies, and an important supplier to the UK Ministry of Defence (**MoD**).

The General Dynamics Corporation has more than 1,450 employees in the UK, including approximately 1,350 who work for General Dynamics UK, located across four sites.

Our supply chain:

- General Dynamics UK has a supplier base of over 1,000 companies worldwide
- General Dynamics UK works with Small and Medium-Sized Enterprises (**SMEs**) on collaborative projects through EDGE UK®, which was founded in 2008
- General Dynamics UK has worked with over 120 SMEs through EDGE UK® so far

## **POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING**

The following policies are relevant to and operate alongside the General Dynamics UK's policy on Modern Slavery and Human Trafficking:

	<b>Title</b>
[1]	Standards of Business Ethics and Conduct (Blue Book)
[2]	Whistle-blowing Policy
[3]	Grievance Policy
[4]	Anti-Slavery and Human Trafficking Policy ("the Policy")
[5]	Sustainable Procurement Policy Statement

We have reviewed these policies in 2018 and these reviews will be ongoing annually.

The above policies make it clear to our people, our suppliers and all of our stakeholders that we will not tolerate or condone abuse of human rights including those rights set out in the Act, within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected. All reports of failure to comply with the above policies will be fully investigated and appropriate remedial action taken.

## **EVALUATION OF RISKS**

General Dynamics UK takes steps to evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. Our standard supplier contractual terms are being reviewed to ensure that they include obligations on the supplier to comply with the Act. We require our suppliers to represent and warrant compliance with the Act and all applicable laws and regulations and international standards, including without limitation, UK laws and the laws in the country or countries in which they do business. This process of reviewing supplier contracts will continue during 2019.

General Dynamics UK is also considering further steps to identify relevant risks within its supply chain by improved supply chain auditing and verification and dialogue, as well as training programmes with suppliers in higher risk areas.

## **INTERNAL ACCOUNTABILITY**

General Dynamics UK's Board of Directors sets the tone for our ethical culture and holds managers accountable for communicating ethics and compliance expectations to our workforce, including in relation to modern slavery. We believe this "tone from the top" combined with our ethics and compliance training, and educational resources accessed via our company intranet site helps to create and sustain an ethical and legally compliant culture.

In 2018, General Dynamics UK began planning a programme for raising the ethical awareness of its personnel, including Anti-Slavery and Human Trafficking training to be

included in our new employee induction pack and for this Statement to be available on line for inspection.

General Dynamics UK requires its employees and contingent workers to comply with its Blue Book and all policies. An employee's violation of the code of conduct may result in disciplinary action being taken, up to and including, termination.

We encourage anyone (including employees, contractors, suppliers, distributors, and customers) to report in good faith any concerns about potential ethics issues, including human rights violations and improper or unethical business practices such as fraud or bribery. The General Dynamics Corporation operates a world-wide ethics helpline for this purpose. General Dynamics UK investigates and will seek to resolve concerns raised by employees and all those associated with the organisation. Individuals can also report concerns by email, telephone, or letter, in English or their local language, or if they are an employee of General Dynamics UK, by raising the matter with their line manager. This process is reviewed annually.

**CONTINUAL IMPROVEMENT**

We continually review the effectiveness of our processes and where necessary introduce additional measures to ensure that our obligations under the Act are passed through our supply chain and all other areas of the business.

General Dynamics UK is working towards mapping its supply chain to assess whether there may be particular modern slavery risks in our industry or any of the geographical locations of our customers and or suppliers.



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Steve Rowbotham, Director, General Dynamics United Kingdom Limited

Revision History

Revision	Date Published	Details of Changes
001	March 2019	Initial issue

