

Williams Advanced Engineering Limited

Modern Slavery & Human Trafficking Statement for the Financial Year ended 31 December 2021

1. Introduction

- 1.1. Williams Advanced Engineering Limited ("WAE") is committed to ethical business practice and believes that acting responsibly and with integrity is vital to our continued success. Slavery and human trafficking are abuses of a person's freedoms and rights and these practices should be eradicated.
- 1.2. This statement highlights the steps WAE takes as an organisation to prevent modern slavery and human trafficking in our own operations and supply chain.

2. Organisational structure, our business and supply chain

- 2.1. WAE is a world-leading engineering, technology and consulting business providing innovative electrification and lightweight technology solutions to a range of sectors including motorsport, automotive, healthcare, mining, aviation, defence and energy.
- 2.2. WAE was acquired by the Australian company, Fortescue Metals Group (**Fortescue**), in February 2022. WAE will, however, remain an independent business with operations based in the UK. Our supply chain is predominantly comprised of materials and component manufacturing businesses operating in the engineering sector, but also includes businesses providing a variety of other goods and services including professional services, general consumables, food and drink, temporary staff and IT products. We also rely on a global supply chain to design, develop and manufacture components for our product portfolio. Our supply chain ranges from SMEs in the UK to large multi-national businesses operating in Europe and further afield.

3. Supply chain due diligence and risk management

- 3.1. WAE are committed to implementing effective systems and controls to ensure that our suppliers recognise our standards for compliance with applicable laws and regulations, including those relating to the prohibition of slavery and human trafficking.
- 3.2. WAE aim to conduct all aspects of our business in accordance with our core corporate values of Leadership, Courage, Integrity, Empowerment, Positivity, Agility, Innovation and Wellbeing. These core values form the foundation of our business, and we expect that all of our suppliers uphold similar values.
- 3.3. Our standard purchasing terms and conditions place obligations upon our suppliers, including to:
 - i. adhere to codes of conduct, policies, and anti-slavery laws;
 - ii. allow us to audit them to ensure compliance;
 - iii. notify us in the event that any actual or suspected slavery or human trafficking takes place in connection with their contract with us; and
 - iv. implement their own due diligence procedures.
- 3.4. Under our standard terms we are entitled to terminate our contractual relationship with a supplier for breach of the obligations outlined above.
- 3.5. We require each of our suppliers to complete our modern slavery questionnaire prior to engagement. We assess the responses to the questionnaire in a proportionate manner according to the level of risk associated with the relevant supplier and its products or services.

4. Internal Policies on Slavery and Human Trafficking

- 4.1. WAE's **Ethics Policy** sets out the standards by which all employees are expected to conduct business and it specifically highlights our position on modern slavery both for our employees and the businesses with which we engage.
- 4.2. We also have a standalone **Anti-Slavery and Human Trafficking Policy**, the purpose of which is to ensure that all staff:
 - i. are aware of modern slavery issues;
 - ii. understand the internal processes which must be followed in order to ensure that appropriate due diligence is conducted on potential suppliers; and
 - iii. know how to report any potential issues so that action can be taken.
- 4.3. Our **Public Interest Disclosure Procedure** provides a safe mechanism through which staff members are encouraged to raise concerns regarding business activities, including those related to slavery and human trafficking.
- 4.4. WAE also have an **Environmental, Social and Governance (ESG) Policy** to set out our vision to improve sustainability within our supply chains and to reinforce our commitment to eradicating slavery and human trafficking from our business operations and supply chains.
- 4.5. We are committed to identifying, assessing, and mitigating human rights impacts, and ensuring continuous improvement to strengthen our approach.

5. Training

- 5.1. WAE understands the importance of building compliance capability across its business and, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our employees.
- 5.2. In the course of 2022, we will be conducting further training sessions for our Procurement team and wider business, which will provide targeted guidance on our due diligence and monitoring processes.
- 5.3. We also plan to provide general awareness training to employees that is appropriate to the level of interaction they have with suppliers.

6. Plans for 2022

- 6.1. WAE was acquired by Fortescue, an Australian mining business, on 28 February 2022. Although WAE will remain independent, both businesses will be working closely together to ensure ESG issues, corporate governance, and general compliance are aligned. This will include looking at WAE's current policies, training, and ways to further mitigate the existence of human trafficking and slavery in WAE's supply chain.
- 6.2. Governance is essential to our sustainable, long-term success, driving value creation and positive outcomes for our stakeholders and we will work closely with Fortescue to ensure governance and compliance are aligned.
- 6.3. In addition to WAE's usual due diligence process for the onboarding of potential suppliers, we will be looking to carry out a more comprehensive risk assessment and screening of our potential suppliers (by way of analytics software). Any supplier that falls under the "high risk" category will require further scrutiny and extra onboarding requirements, should the business decide to proceed.
- 6.4. Where we are able, we would like to work towards physical visits and screening of suppliers.
- 6.5. WAE will focus on ensuring that employees and contractors are conversant with all updated internal policies and training, including, assessing supplier risk and general compliance.
- 6.6. WAE is committed to maintaining a sustainable and responsible supply chain. To continue to mitigate against any slavery and human trafficking in our supply chain, we will continue to work collaboratively with our key stakeholders to refine and improve our policies, procedures, and programmes throughout 2022. We will continue to outline steps to tackle these issues in our annual sustainability report and modern slavery statement.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes WAE's anti-slavery and human trafficking statement for the financial year ending 31 December 2021.



Signed by
Craig Wilson
Managing Director, Williams Advanced Engineering Limited

Date: 30th June 2022