

Navantia UK Modern Slavery Statement

A Message from Navantia UK

This statement relates to Navantia UK Ltd. The statement relates to the financial year ending 31 December 2025.

It continues to be a priority for Navantia UK to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

1. Organisation's structure, its business and supply chains

We are a manufacturer in the naval shipbuilding sector supporting the UK's defence, security and energy ambitions. We are a subsidiary of Navantia SA, a Spanish state-owned company with over 300 years of naval shipbuilding history.

Organisation and supply chain structure

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

Our supply chains

Our supply chain uses mostly UK and Spain based companies or companies that have a long-standing business relationship with Navantia SA.

Navantia UK strictly prohibits the following practices in its supply chain, and expects its agents and suppliers to prohibit such practices:

- Any restriction on the freedom of workers movement, association or ability to terminate their employment;
- Any threat of violence, harassment and intimidation;
- Use of worker-paid recruitment fees;
- Compulsory overtime;
- Child labour; and
- Confiscation of workers original identification documents.

2. Our policies on slavery and human trafficking

We aim to have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

To identify and combat modern slavery in our supply chain we take, and expect each of our agents, contractors, consultants, third party suppliers and other business partners to take, the following steps:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- Undertake appropriate due diligence in our supply chains;
- Ensure we have in place an appropriate reporting and whistle-blowing process for all workers in our supply chain; and
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare.

Our procedures to also address modern slavery risk include:

- An ethics hotline that allows for anonymous reports to be submitted by our people, customers and suppliers;
- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace;
- Robust recruitment processes in line with relevant employment laws;
- Market-related pay and rewards reviewed annually; and
- A Procurement policy for how we deal with suppliers and a Business code of conduct making clear the standards we expect.

Due diligence processes, risk assessment and management

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our procurement policies. When we onboard a new supplier, a thorough due diligence process takes place, which they must pass before they are accepted as a supplier and included on Navantia UK's database. This is to ensure the supplier has a good reputation with appropriate practices in a number of areas including people and culture.

Modern slavery risk management governance

We ensure that we have identified named individuals and specific departments within the organisation to be responsible for our modern slavery risk management.

Navantia UK's Board of Directors has overall responsibility for ensuring compliance with our Modern Slavery and Human Trafficking policy and procedure. However, the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all persons working for and on behalf of Navantia UK in any capacity (including all employees, suppliers, agents, external consultants, third party representatives and business partners).

Communication and enforcement of policies

We aim to communicate and enforce policies within the organisation and to suppliers and subcontractors by:

- providing periodic training to our people on the subject of modern slavery and our policies to address the risks to help increase education and awareness.
- Engaging with suppliers and subcontractors from the outset and ensuring understanding of our position through provision of our policies and procedures and requiring adherence to our supplier code of conduct.

Grievance mechanisms

As part of our approach to prevent and mitigate the risk of slavery and human trafficking we have certain grievance mechanisms in place:

- Through a report via the Ethics Channel via email, post, website or hotline

3. Monitoring and evaluation: our effectiveness in combating slavery and human trafficking

Key Performance Indicators (KPIs)

We monitor uptake of mandatory training; the number of credible third-party complaints concerning compliance or reported incidents of procedure violations; and we monitor the number of non-compliance findings identified throughout business operations.

FY25 Data

Reported incidents related to modern slavery/trafficking: 0

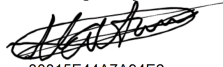
Future steps

Our organisation has further plans to increase the robustness of our controls throughout the next financial year. These include:

- Creation and implementation of a specific Supplier code of Conduct;

- Creation and implementation of an Anti-Slavery and Human Trafficking procedure;
- Enhanced modern slavery training materials;
- Annual review of supplier and sub-contractor risk assessments;
- Creation of an internal Compliance function which will have overall responsibility for modern slavery policies and governance; and
- Internal modern slavery audits.

This document explains the steps Navantia UK is undertaking to prevent, detect and respond to modern slavery within our business and supply chains. It is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Navantia UK's slavery and human trafficking statement for the financial year ending 31 December 2025. It has been approved by the Board of Navantia UK.

DocuSigned by:

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