# UK Modern Slavery Act Modern Slavery Statement

#### Introduction

MB Aerospace Newton Abbot Limited and MB Aerospace Limited, together with their UK parent companies, MB Aerospace Holdings Limited, and MB Aerospace Holdings I Limited (collectively the Company) recognizes its responsibility to adopt robust procedures to address modern slavery risk in our supply chain and business.

## 1. Organization Structure and Supply Chains

The Company, a Barnes Aerospace business, manufactures and maintains highly engineered parts for the aerospace and related industries globally. With elevated experience, The Company has a steadfast commitment to continuous improvement and the relentless pursuit of next. The Company offers strict compliance with customer, regulatory, and third-party standards (e.g., ISO, AS, NADCAP) for the commercial aerospace, defense/military, energy, and space industries where quality is crucial.

The Company is committed to working collaboratively with our supply chain partners to conduct our business with integrity and in accordance with the highest ethical standards. The Company complies with all applicable laws and regulations, including Part 6 of the UK Modern Slavery Act 2015 and FAR Subpart 22.17 Combating Trafficking in Persons.

#### 2. Policies in relation to slavery and human trafficking

The Company maintains several policies to ensure that we conduct our business in accordance with the highest ethical standards. These policies include:

- Code of Business Ethics and Conduct
- Supplier Code of Conduct
- Human Rights Policy

Our Code of Business Ethics and Conduct applies to all officers, directors, employees, suppliers, contractors, and agents and requires our business and our people to act with integrity and in alignment with our Code.

The Barnes Aerospace Terms and Conditions of Purchase obligate our suppliers to comply with the Barnes Supplier Code of Conduct, which prohibits suppliers from engaging in the use of child or forced/slave labor and human trafficking. The Supplier Code of Conduct and Human Rights Policy makes it explicit that forced labor, slavery, child labor, and human trafficking have no place in our business or the business of our value chain. A violation of the Supplier Code of Conduct, including violation(s) of law regarding human trafficking and slavery, would constitute a breach of the supplier's commitments under the terms of our

agreements and would serve as grounds for corrective actions, up to and including termination.

In addition to the Compliance policies outlined above, Barnes maintains a reporting hotline that provides a secure online or telephone reporting tool 24 hours a day, 7 days a week. The tool is available in multiple languages and allows for anonymous reporting.

### 3. Due diligence processes

The Company regularly conducts on-site supplier audits. Included in the supplier on-site audit are site tours, during which The Company personnel observe the condition of employment and are encouraged to report any concerns.

### 4. Risk assessment and management.

Barnes Group Inc. conducts an enterprise risk management process annually to assess enterprise risk, including supply chain risk.

## 5. Key performance indicators

The Company continues to review its policies and procedures around modern slavery to ensure compliance.

## 6. Training

The Company supply chain personnel are trained on our Code of Conduct annually. In addition, supply chain personnel engage in regular team meetings on supplier code of conduct matters, including the prohibition of human trafficking and forced labor.

#### Other Information

Barnes Group Inc. produces an annual <u>Environmental, Social, and Governance</u> report which provides additional details and information regarding human rights activities.

Signed 20th day August 2024

Merhant V. Kenney

Michael V. Kennedy

Director

MB Aerospace Holdings I Limited