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## HUMAN RIGHTS POLICY

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## 1. POLICY STATEMENT

- 1.1 Melrose Industries PLC and its Business Lines (comprising the GKN Aerospace Engines and Structures businesses) (“**Melrose**”, “**Company**”, “**Group**” or “**we**”) are committed to upholding human rights according to international standards, and to ensuring that the human rights of all Group employees are protected.
- 1.2 The purpose of this policy is to set out the Group’s policy standards and to affirm the importance of human rights to the Group’s strategy and sustainability.
- 1.3 This policy has been approved by the board of directors of Melrose Industries PLC.
- 1.4 Throughout the Group we seek to establish a “culture” of compliance with this policy. The executive team of each Business Line takes responsibility for ensuring effective transmission of this policy throughout the business, together with the provision of relevant guidance and training, and appropriate safeguards, monitoring, and resources, in order to ensure compliance with this policy.

## 2. WHO IS COVERED BY THIS POLICY?

- 2.1 This policy applies to all individuals working at all levels throughout the Group, including senior managers, officers, directors, employees (whether permanent, fixed-term, or temporary), contractors, trainees, casual workers/agency staff, volunteers, or any other person working for the Group throughout the world (collectively referred to as “**Group Associates**” for the purposes of this policy).
- 2.2 This policy also applies to any person, or any organisation, working for or performing a service for or on behalf of the Group – for example, pension trustees, consultants, lawyers, accountants, other business advisers, suppliers, agents, distributors, joint venture partners or other persons whilst they are working for or performing a service for or on behalf of the Group throughout the world (collectively referred to as “**External Associates**” for the purposes of this policy). We expect the highest ethical standards from our business associates and expect them to comply with or exceed the principles of our Supplier Code of Conduct.
- 2.3 Group Associates and External Associates are together referred to as “**Associates**” for the purposes of this policy.
- 2.4 All Associates are responsible for ensuring they read, understand and comply with this policy.

## 3. COVERAGE OF POLICY

- 3.1 The Group has a zero-tolerance approach to the abuse of human rights and is committed to acting ethically and with integrity in all the Group’s business dealings and relationships and to investing in, implementing and enforcing effective systems and controls across the Group to safeguard against adverse human rights impacts. We strive for continuous improvement through monitoring performance and alignment with our future corporate strategies.
- 3.2 The Group is committed to respecting human rights in accordance with international human rights principles including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and The International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.
- 3.3 The below policies should be read in conjunction with this Human Rights Policy:
  - (a) Anti-Slavery and Human Trafficking Policy
  - (b) Code of Ethics
  - (c) Conflict Minerals
  - (d) Diversity and Inclusion Policy
  - (e) Whistleblowing Policy

### 3.4 Forced and Child Labour

The Group respects and complies with all relevant local laws regarding voluntary employment and minimum age for employment. We do not tolerate slavery, servitude, forced or compulsory labour or human trafficking in any of our operations or supply chain. Bonded, indentured or involuntary prison labour is also not accepted. More information may be found in the Group's Anti-Slavery and Human Trafficking Policy.

We do not tolerate child labour in our operations or supply chain. The Group commits to support children's rights and to avoid any sort of child labour in its business operations consistent with the International Labour Organization's (ILO) Conventions on child labour and Principle Five of the United Nations Global Compact principles, and expects the same standards from its suppliers.

### 3.5 Freedom of Association and Collective Bargaining

The Group respects the rights of its workers to participate in collective bargaining and freedom of association. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively in relation to a host of employee related matters. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

### 3.6 Working Time and Wages

The Group complies with working hours laws and commits to offer employees fair compensation that meets or exceeds the legal minimum standard in line with national wage and overtime laws. We require our suppliers to ensure that they respect their workers equally and with respect and dignity, for all workers to be of an appropriate age in compliance with the local legal minimum age for work, for all workers to be paid a fair wage that meets or exceeds the legal minimum standard or prevailing industry standard, and to eliminate excessive working hours for all workers in compliance with local laws.

### 3.7 Conflict Minerals

Consistent with our Conflict Minerals Policy, the Group is committed to conducting business with integrity and in a responsible, ethical and sustainable manner, which includes the proactive elimination of conflict minerals from products and the supply chain. We commit to not source minerals from the DRC and adjoining countries, complying with US legislation and OECD due diligence guidance.

Consistent with this commitment, if we source products or raw materials containing 3TG (cassiterite (tin), coltan (tantalum), wolframite (tungsten) and gold), we shall adopt procedures, to the extent required by applicable laws or customer expectations, to seek to identify whether such 3TG minerals are sourced responsibly and from conflict-free regions, taking a risk-based approach.

### 3.8 Health and Safety

The Group recognises the increasing importance of taking a holistic approach to employee wellness, to protect their physical and mental health and social wellbeing, and to foster a positive workplace culture that attracts and retains a highly skilled workforce.

We prioritise the safeguarding of employee health and wellbeing across the Group and are committed to promoting wellbeing and to ensuring awareness and that our employees are safe. We will identify and manage workplace risk to prevent accidents and occupational illness.

We will work closely with our suppliers to ensure they respect and promote good working conditions across their supply bases, and to ensure all workers' health and safety rights are protected at work.

### 3.9 Non-discrimination

The Group is a meritocracy, and in all aspects of employment such as appointment, compensation, training and promotion we will respect each individual's human rights and will treat all individuals

in a non-discriminatory manner. This is without regard for factors such as gender, race, ethnicity, country of origin, nationality, colour, social and cultural background, religion, family responsibilities (including pregnancy), sexual orientation, age and disability.

Please refer to the Group's Diversity and Inclusion Policy for further insight into our stance on equal opportunities.

### 3.10 Due Diligence

In recent years, the move towards mandatory human rights due diligence in company supply chains has gathered pace. The Group commits to ensure that it is not complicit in human rights violations within its own operations and commits to take a risk-based approach in performing human rights due diligence across its operations to assess risk exposure in line with applicable laws, and to ensure the effectiveness of this policy. We work closely with our suppliers to ensure they respect human rights.

We will implement effective and proportionate measures to identify, assess and mitigate potential labour and human rights abuses across our operations and supply chain. These include training, modern slavery policies, employee handbooks and business-specific policies. All employee policies are reviewed locally to ensure compliance with local laws and standards as a minimum.

### 3.11 Remedy

The Group is committed to investigating, addressing and giving remedy in response to human rights violations that it has been found to have caused or contributed towards.

## **4. HOW TO RAISE A CONCERN**

4.1 Group Associates are encouraged to raise concerns at the earliest possible stage if they suspect any violation of human rights in the Group's operations, supply chain, or relevant third parties' operations. If a Group Associate believes that any part of this policy has been infringed, they should raise any concern via the Group's confidential ethical reporting line, which can be accessed at [www.melrose.ethicspoint.com](http://www.melrose.ethicspoint.com).

4.2 For further information, please refer to the Group's Whistleblowing Policy.