



# Modern Slavery and Human Trafficking

**Statement**  
May 2025



Modern Slavery, Forced Labour and human trafficking is a global issue affecting society across different industry sectors, and countries. It can represent some of the gravest crimes of human rights abuse in our society.

We fully support and abide by the principles of the UK Act and the Modern Slavery laws of other geographical markets in which QinetiQ operates, as well as addressing new and emerging human-rights legislation.

We do not tolerate Modern Slavery in our operations or our supply chain.

We continue to review and develop our practices to ensure that we are strengthening our processes and guidance and have made further progress this year.

Responsible business practice underpins how we operate and we have a strong commitment to work with our industry partners and supply chains to play our part in raising awareness and supporting the eradication of Modern Slavery.

**Steve Wadey**

Group Chief Executive Officer

This is the Modern Slavery and human trafficking Statement for QinetiQ Group Plc, issued under section 54 of the Modern Slavery Act 2015 (the Act) in the UK and in accordance with the Modern Slavery laws of other locations in which QinetiQ operates. It constitutes our statement for the financial year ending 31 March 2025, **setting out the measures QinetiQ Group plc takes to prevent slavery and human trafficking in our business and supply chains.**

**Our Business and Supply Chains**

QinetiQ Group plc is the parent company of a number of wholly-owned subsidiaries, with the UK, US and Australia, our three home countries, representing 94% of our revenue.

- QinetiQ Ltd, based in the UK is the largest part of the Group and is where our Group Head Office is located
- Our US Sector sits within our Global Solutions division, and comprises QinetiQ Inc., Foster Miller Inc. and Avantis Federal LLC, along with their operating subsidiaries.
- In Australia we have, QinetiQ Pty Ltd and Air Affairs (Australia) Pty. Ltd
- QinetiQ Target Systems Ltd (a UK entity with facilities in UK and Canada),
- QinetiQ Group Canada Inc,
- QinetiQ GmbH (Germany)
- QinetiQ Training and Simulation Limited (UK)
- Naimuri Ltd (UK)
- the Inzpire Group Ltd (UK)

QinetiQ is a science, engineering and professional services company operating in the defence and security markets. Our customers are predominantly government organisations. We are an information, knowledge and technology based business with a wide array of unique facilities.


We operationally manage the business through four operating Sectors, each with their own Chief Executive and Leadership Team.

**We report through two segments:**

- Europe, the Middle East and Australasia (EMEA) Services, providing advice and services, particularly test and evaluation; and
- Global Solutions, delivering products and solutions supported by research and development.

 Number of employees:  
8,403

 Number of countries we are based in:  
5

 Number of suppliers:  
6,229

 Percentage spend with suppliers in our three home countries (UK/US/Australia):  
98%

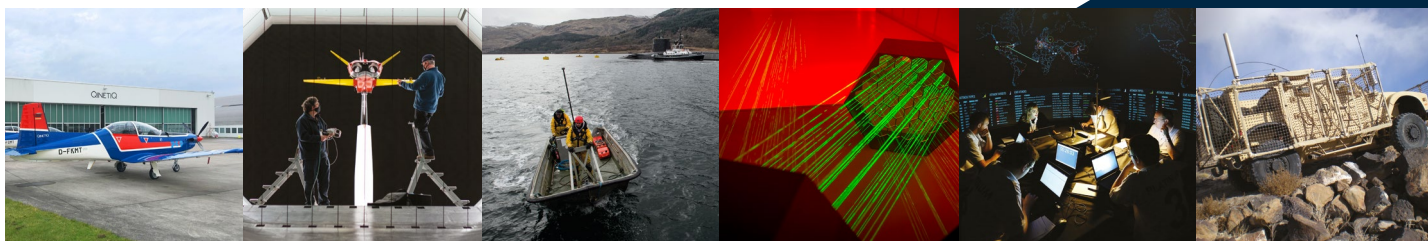


The Group revenue for FY25 was  
**£1,931.6m**

With approximately **94%** of revenue coming from our home countries (UK/US/Australia)

	UK	US	AUS	ROW
Percentage of the workforce located in our three home countries and rest of the world (ROW)	73%	15%	10%	2%





### Our capabilities are grouped into five areas;

- Research & Development
- Engineering Services
- Test & Evaluation
- Training & Simulation
- Cyber & Intelligence

We do not undertake mass production or significant manufacturing. Approximately 6% of revenue is generated from our product sales, which are primarily targets and robotics.

Our product and service supply chains are relatively short and often draw primarily on domestic suppliers, although in some cases these extend globally.

### Suppliers by geographical region

North America  
and Canada

29%

Europe

54%

Rest of world

1%

Australasia

16%



The Group spend with  
suppliers for FY25 was

£1.1bn

### Our suppliers can be divided broadly into two categories;

- 1 Those that we use to support our operations (e.g. Infrastructure, Facilities Management Services and IT); and
- 2 Those that support the delivery of services and products to our customers (e.g. Engineering and Research).

The goods and services that we procure in the delivery of our business are largely high-end technology, commercial off-the shelf products, and high-end consultancy and research services.



## Our Policies and Controls

The QinetiQ Group **Code of Conduct** describes our values and standards, and how we work with our people, our customers and partners, local communities and the public.

As well as complying with all applicable laws and regulations, we are committed to meeting the highest ethical conduct and professional standards. Our Code of Conduct includes guidance on Modern Slavery.

We abide by and respect international labour laws. Because of the nature of the work that we do, our skilled and permanent workforce, and where our sites are located, we do not have a significant risk of slavery within our operations and workforce. However, we are not complacent. We continue to review our resourcing policy and responsible recruitment processes to consider and mitigate the risks of Modern Slavery and Forced Labour.

Our employees are protected by our policies such as health and safety, security, recruitment, pay, working hours, freedom of association and non-discrimination.

Human rights issues are embedded in our international business risk management processes and our Ethical Trading Policy. We have specific requirements to address the risk of Force Labour, Modern Slavery and human trafficking in our procurement policy and processes.



We are committed to responsible business conduct and believe that forced labour or slavery is not acceptable within our business or our supply chain.

Our Group **Supplier Code of Conduct** defines the minimum standards that our suppliers (and their suppliers) are required to adhere to when they deliver products or services to QinetiQ.



Our policies and codes provide guidance to our employees, suppliers and partners to support the prevention of Modern Slavery and human trafficking from taking place in our business or in our supply chains.

We monitor the application of our policies and procedures through our business assurance processes. We believe that this embedded approach to responding to Modern Slavery and human rights issues is effective.

In keeping with U.S. government policy – which, by law, applies to U.S. government contractors and their employees, subcontractors, subcontractor employees, and agents – during or in connection with the performance of any of our business activities, we prohibit any person associated with QinetiQ from using forced labor or procuring commercial sex acts. We are committed to practices that deter and prevent these forms of trafficking and slavery.

We take care to put timely mechanisms in place to comply with emerging international human rights-oriented laws and policies that apply in or are issued in places where we operate.

### Speak Up

We are committed to a culture where people are confident to speak up and raise concerns. We have an ethics email advice service, a network of Ethics Champions and an independent confidential reporting line for employees and third parties to report any concerns.

We communicate this to our employees via our Code of Conduct, our business ethics training, and wider awareness communications to third parties via our code of conduct and supplier Code of Conduct.

The QinetiQ Board oversees confidential reporting. During FY25, we have had no issues raised about Modern Slavery or Forced Labour via these routes.

Anyone can call free from a landline

 **Australia**

1800 986 239

 **Canada**

1-844-932-1013

 **France**

0805 08 09 86

 **Germany**

0800 1890364

 **UK**

0800 069 8738

 **USA**

1-888-400-4511

### Our Due Diligence and Risk Management

We undertake Modern Slavery and Forced Labour risk assessments at an enterprise level across our business, and particularly in relation to our supply chains.



In the UK, we are a leading participant of the Joint Supply Chain Accreditation Register (JOSCAR) which in collaboration with other UK defence and security primes, helps us mitigate Modern Slavery risks within our supply chains during pre-qualification and annual reassessment.

As part of our wider human rights and governance compliance activity, all suppliers are screened for sanctions and previous prosecutions, and our subcontract terms and conditions explicitly require our suppliers to be legally compliant with Modern Slavery and human trafficking legislation.

We undertake risk reviews of our suppliers based on country, products, services and sector risk. In our supply chain where we consider to have a potentially higher risk of Modern Slavery, Forced Labour and human trafficking occurring or potential cause for concern, we undertake appropriate action to understand, qualify and address the risks or issues.

**Higher risk categories of concern to QinetiQ include:**



IT



Facilities Management



Electronics



Batteries



Manufacturing



Textile and Clothing



Robotics



Transport and Distribution



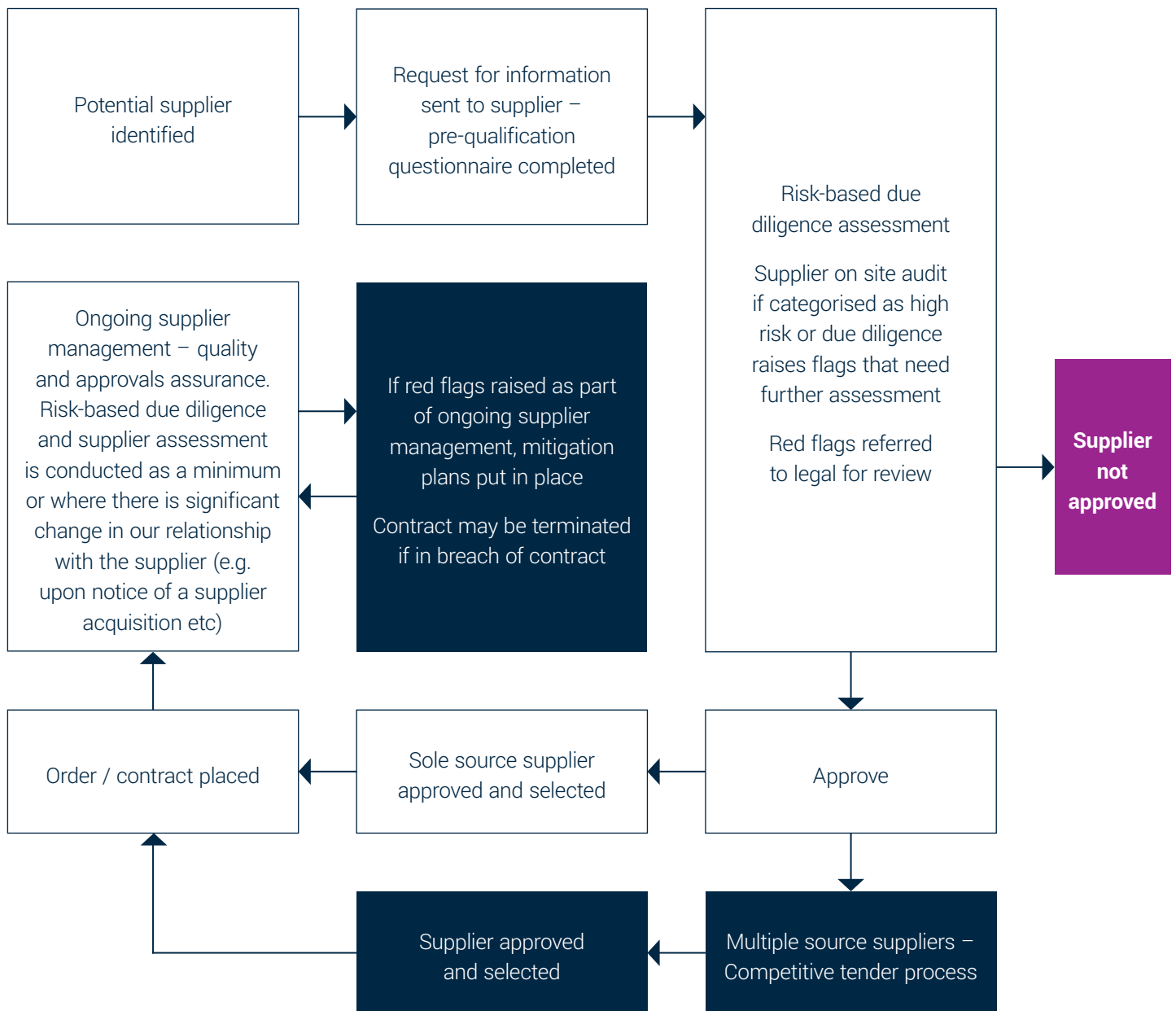
Construction



Waste Management

In FY25 circa **21%** of our Group spend is in higher risk categories. Approximately **0.2%** of our spend was in high risk countries.

## Supplier Assurance & On-boarding



## Training and raising and awareness

QinetiQ recognises that the knowledge, responsibility and conduct of our people play an important role in mitigating the risks of Forced Labour, slavery and human trafficking within our organisation and supply chains. To help our employees identify and address Modern Slavery, human trafficking and Forced Labour risk in our business, during FY25 we developed a new in depth online e-learning training module.

We also deliver specific training for our Supply Chain functions, and awareness raising sessions for our supply chains (see next page for details).

We include a Modern Slavery scenario in our annual business ethics training, which is a mandatory requirement for all employees and undertaken by our Board. This approach helps ensure all our employees are aware of the issues and understand their role in helping to prevent Modern Slavery and human trafficking.



We have in place a 'Global Modern Slavery Resource Hub' on our Sustainability Knowledge NetworQ to give our employees and those in key roles access to the latest information and resources.



## Stakeholder Engagement

We recognise that learning from and collaborating with others will strengthen our approach to tackling Forced Labour and Modern Slavery. We actively participate in our trade bodies Aerospace Defence Security (ADS) Business Ethics Network and techUK Responsible Business Conduct Group where we are able to share best practices on ethical and human rights issues and work in collaboration with our suppliers, peers and customers.

QinetiQ co-chairs key sector sustainability groups, which cover Modern Slavery and Forced Labour, including the ADS Sustainability Network and the UK MOD Industry Sustainable Procurement Working Group.

As part of our strategic customer engagement, we continue to review findings and recommendations from the UK Government Modern Slavery Assessment Tool (MSAT), and as an attending member of the Trade and Forced Labour Business Roundtable chaired by the UK Government Department for Business and Trade.



In FY25, our MSAT score stands at 82%.

As part of our “QinetiQ Collaborate” series of events, during FY25 we ran a QinetiQ Collaborate on Modern Slavery. This virtual event was an open invitation to our supply chain and industry. See case study for more information.

Within our company, addressing Modern Slavery requires collaboration across functions and sectors, with key roles from Environmental Social Governance (ESG), Supply Chain and Procurement, Legal and Governance, Operations, Growth, and our People function involved. We engage across our Group to ensure that our Group entities and subsidiaries are involved in our programme, including contributing to the writing of this statement.



## Case Study

The QinetiQ Collaborate **Supply Chain Modern Slavery Awareness Briefings** were virtual events hosted in July 2024.

The Collaborate series aims to ensure that good practices are shared throughout our supply chain and wider external stakeholders by providing a thought leadership platform for learning across the defence and security sector especially for Small Medium Enterprises (SMEs).

In FY25 QinetiQ hosted three internal and one external facing Collaborate session to deliver supplier awareness briefings aligned with our internal training, this covered:

- Supply Chain
- Modern Slavery & Climate Change
- QinetiQ in Numbers
- Bringing it to Life
- Recruitment
- Signposting

Feedback from these events showed this to be well received and one of our more successful Collaborates and showed how important this subject is to our wider stakeholders.

We are looking to do the same again next year.

## Key Performance Indicators

FY25

1	The number of supplier awareness briefing sessions delivered	3 Internal 1 External
2	% of suppliers who have acknowledged and accepted the Supplier Code of Conduct*	80%
3	% of suppliers who have fully completed JOSCAR assessments*	76%
4	% of suppliers in high risk countries where we have completed annual sanctions checks	100%
5	The number of updates provided to the Board on Modern Slavery	1

\*only applies to QinetiQ UK supply chains.

## Assessment of and the effectiveness of our approach

Modern Slavery is a complex and evolving issue. We regularly review progress, learn from best practices and deliver improvements so that we continue to improve our approach.

Modern Slavery is covered in our Group Supply Chain and Procurement Procedure on our Group Business Management System which applies to all Group entities. In addition, we operate a self-certification governance process for ensuring compliance. All Group entities and subsidiaries are required to make an annual statement of compliance. During FY25 there were no issues identified through this process.



Our approach is to ensure we have an effective policy and process. We engage with our supply chain, industry peers and raise awareness of the issue of Modern Slavery with our people via training and communications.

**In FY25 we:**

- Reviewed and updated our Group Modern Slavery Action Plan to ensure that it continues to be relevant and effective.
- Continued to work with our third-party subcontractors on UK sites as they progress towards compliance with our Real Living Wage commitment.
- Implemented further recommendations from the UK Government Modern Slavery Assessment Tool (MSAT) and PPN 009/25 regarding risk assessments.
- Developed a Group online e-learning training module for employees across the Group including Supply Chain, Legal, People, Quality and Sustainability functions as well as all new starters.
- Incorporated the US Combatting Trafficking in Persons Policy and its prohibition of procuring commercial sex acts into our Group online e-learning training material on Modern Slavery.
- Delivered three internal and one external facing Collaborate supplier awareness briefing session, providing one as a recording available on the Collaborate site.
- Participated in the techUK Responsible Business Conduct Group
- Participated in the UK Government Department for Business and Trade's – Trade and Forced Labour Business Roundtable
- Worked collaboratively with the JOSCAR ESG Working Group to refine and update to the latest version of the supplier pre-qualification questionnaire, including questions on Human Rights, Forced Labour, Modern Slavery and Real Living Wage.
- Commenced investigations into potential governance approaches for assessing suppliers at Tier 2.
- Assessed the impact of the newly published Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (1 January 2024) to determine whether we are within scope. Against the three criteria required for reporting, we exceeded the threshold of two, so do now have to report.

**– Continued to:**

- Work closely with our Group entities and subsidiaries to align our policies and procedures.
- Screen new suppliers and provide additional scrutiny on high-risk suppliers.
- Raise awareness (via communications and intranet web resources) for our people e.g. the Sustainability Knowledge NetworQ.

**Next Steps****During FY26 and beyond we plan to:**

- Deliver online supplier awareness briefings.
- Update the Group Supplier Code of Conduct.
- Update the Group Sustainable Procurement Guide
- Continue investigations into potential governance approaches for assessing suppliers at Tier 2.
- Continue to:
  - Review and update our Group Modern Slavery Action Plan to implement recommendations as per the new UK Government Transparency in Supply Chains Statutory Guidance.
  - Evolve our approach to supply chain management, training and capability building, due diligence, risk management and stakeholder engagement.
  - Ensure that our policies and procedures remain current and compliant.
  - Provide training for those in key roles.
  - Screen all new suppliers, and annually assess those in high risk countries or supplying high risk categories.
  - Engage with tier 1 suppliers.
  - Learn and share best practice through our trade and professional bodies.
  - Monitor the development of new regulations or guidance relating to prevention of Modern Slavery, Forced Labour and human trafficking in the territories where we operate and deliver to.

## Governance

Strong governance underpins responsible business practice and our Board receives regular briefings on business ethics and Modern Slavery.

Our Business Ethics Committee, chaired by our Chief Ethics Officer, Group Company Secretary & General Counsel, has oversight of our human rights approach, including Modern Slavery.

The Modern Slavery programme is delivered via collaboration across key functional roles (e.g. Supply Chain and Procurement, Legal & Governance, ESG teams and our People function).

The Managing Directors of each of our QinetiQ Group businesses and functions are responsible for Modern Slavery activity within their operations. Overall accountability is held by our CEO, Steve Wadey, and our Board has final approval.

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The Board of directors of QinetiQ Group plc approved this statement at its Board meeting, dated 20 May 2025.

### Signed:

A handwritten signature in black ink, appearing to read 'Steve Wadey', with a stylized flourish at the end.

**Steve Wadey**  
Chief Executive Officer, QinetiQ Group plc

**For further information  
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