

# Modern Slavery Statement

This annual statement is made in accordance with section 54 of the Modern Slavery Act 2015 (**MSA**) with respect to Cohort plc's financial year ended 30 April 2021.

## How is the Group structured?

Cohort plc is quoted on AIM and has its registered office in Theale, Reading. Cohort is the parent company of a group of businesses working primarily for defence, wider government and industry clients (together, the **Group**). The Group has over 1000 employees (based in the UK and Europe).

In the year to 30 April 2021, the Group had a global annual turnover of approximately £143.3 million.

We are committed to improving our practices to combat slavery and human trafficking and the steps we have taken to do so are set out below.

The Group includes the following businesses:

Business	Nature of Business	Location
Chess Group (including Chess Dynamics Limited and Vision4ce Limited)	A supplier of advanced systems and technologies for detecting, tracking, classifying and disrupting naval, land and air threats primarily to serve customers in defence and security markets.	Horsham, Plymouth & Wokingham
Empresa de Investigação e Desenvolvimento de Electrónica, S.A.	A high tech company that designs, manufactures and supplies advanced high performance electronic equipment and systems primarily for the worldwide defence community.	Lisbon, Portugal
ELAC Sonar GmbH	An innovative hydro-acoustics company supplying digital underwater communications systems.	Kiel, Germany
MASS Consultants Limited	An electronic warfare operational support, cyber security, secure ICT networks and support operations business serving customers primarily in defence and security markets.	St Neots and Lincoln
Marlborough Communications Limited	A supplier of advanced electronic communications, information systems and signals intelligence technology to the defence and security sectors.	Horley
SEA Group (including Systems Engineering & Assessment Limited)	A major supplier of applied research, technology development, systems integration, specialist electronic systems, engineering and software design services to the defence and security markets.	Bristol, Barnstaple and Beckington

## The Group's Anti-Slavery Policy

The Cohort plc Anti-Slavery Policy (the **Policy**) reiterates the ethical conduct already expected of the Group and sets out measures that the subsidiaries must take to ensure that slavery and human trafficking are not taking place within their businesses and supply chains. The Policy was reviewed and updated in September 2020. The Board has overall responsibility for the Policy and each Managing Director of a trading subsidiary is responsible for compliance with the Policy by their business.

Each trading subsidiary is required to produce an annual modern slavery report to the Board of Cohort plc which includes the steps taken as part of its review of slavery risk in the business and supply chains, a summary of the key risks identified by the risk review and the actions taken to mitigate those risks together with a statement on how effective the due diligence and risk mitigation steps are in ensuring that slavery and human trafficking is not taking place in the business or its supply chains.

If any doubts are raised during the review as to whether slavery and/or human trafficking exists and the relevant supplier has not provided sufficient evidence to the contrary the relevant subsidiary shall seek to agree an improvement plan with the supplier. If this is not possible or if the supplier does not comply with the improvement plan, the subsidiary is required, where practicable, to cease placing orders with that supplier within 12 months.

The Group encourages employees to report unethical behaviour to their line manager in the first instance. The Group also operates a confidential and anonymous reporting service ('whistleblowing') which is available to all employees.

### **The Group's due diligence process**

In accordance with the Policy, each subsidiary has produced an annual report for the Cohort plc Board of Directors in respect of the year ended 30 April 2021.

The reports confirm that the subsidiaries have undertaken proportionate due diligence during the financial year. This has involved identifying the suppliers we consider to be 'high risk' according to annual spend, sector risk and country risk. If a supplier is identified as high risk, further due diligence will be undertaken and the supplier will be required to confirm in writing which steps it has taken – or will take – to ensure that it is not involved with slavery and/or human trafficking and that it fully complies with the MSA. In the past financial year, no suppliers were identified as 'high risk'.

### **How does the Group manage its risk?**

Following the due diligence process, each subsidiary has confirmed that no key risks have been identified. Therefore, risk mitigation is not currently required although this will continue to be monitored by the Group.

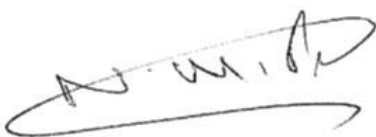
### **Does the Group provide training for its employees?**

Training is provided or will be provided during the current financial year at the subsidiary level to all employees whose role requires them to have an understanding of the risks of modern slavery and human trafficking in our supply chains. Further advice and guidance is available from our Company Secretarial team.

### **Is the Group's approach to anti-slavery effective?**

Taking into account the feedback from each subsidiary, the Cohort plc Board of Director's considers the Group's approach to anti-slavery to be proportionate, robust and effective.

Approved by the Cohort plc Board of Directors on 20 July 2021.



Nick Prest  
Chairman  
**Cohort plc**