



MODERN SLAVERY STATEMENT

2026

A MESSAGE FROM NAVANTIA AUSTRALIA

On behalf of Navantia Australia Pty Ltd (Navantia Australia), I am pleased to endorse the company's Modern Slavery Statement. Our 2025 Statement provides an overview of our efforts to assess our risks of modern slavery and outlines our ongoing journey to address modern slavery risks within our supply chain and operations.

Global estimates of modern slavery are that 50 million people were living in modern slavery in 2021, of which 28 million were in forced labour, 3.3 million of which were children, and 22 million in forced marriage. Of the 28 million, some 17.3 million people in forced labour are exploited within the private sector¹.

The International Labour Organisation, Walk Free Foundation, and the International Organisation for Migration report that forced labour and forced marriage rates have increased significantly over the past five years². The Asia and the Pacific region has the highest number of people in forced labour (15.1 million) and the Arab States the highest prevalence (5.3 per thousand people).

Navantia Australia is committed to engaging with suppliers who source ethically and sustainably. Navantia Australia seeks to advance the understanding and respect for human rights in our operations and supply chain.

We are committed to contributing to the elimination of modern slavery, which is a growing and complex problem. Navantia Australia will report upon the actions that we have undertaken annually, to assess and address modern slavery risks and maintain responsible, transparent supply chain processes.

It should be noted that Navantia Australia adopts similar approaches to assessing, managing and addressing modern slavery risks in line with our global modern slavery policies mandated by Navantia S.A. S.M.E. These are embedded in our policies and procedures under the Navantia Group's Environmental, Social and Governance program.

This statement was approved by the Executive Leadership Team of Navantia Australia on 19 June 2026 in its capacity as the principal governing body of the Navantia Australia.



Israel Lozano
Managing Director

¹ International Labour Organisation, Walk Free Foundation

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1. REPORTING ENTITY

This statement is submitted by Navantia Australia Pty Ltd (ACN 155 020 303) as the sole reporting entity for Navantia's operations within Australia '**Navantia Australia**'. Navantia Australia is wholly owned by Spanish company Navantia S.A., S.M.E (CIF A84076397). Navantia S.A., S.M.E is the 'top-co' operating entity for the Navantia corporation's shipbuilding operations. It is a Spanish state-owned company which belongs to the Sociedad Estatal de Participaciones Industriales (SEPI), which controls 100% of its capital. SEPI is 100% owned by the Kingdom of Spain and is attached to the Spanish Ministry of Finance and Administration.

2. PURPOSE

This Statement is prepared in accordance with the Australian *Modern Slavery Act 2018* (Cth), for the reporting period of 1 January 2025 to 31 December 2025. It outlines the steps that Navantia Australia has taken, and will continue to take, to identify, manage and mitigate the risk of modern slavery with our operations and supply chain.

3. NAVANTIA AUSTRALIA'S OPERATIONS

Navantia Australia was first incorporated in Australia in 2012. This followed a period whereby the Navantia corporation was providing an increasing volume of services to the Royal Australian Navy from Spain, as the ship designer of various vessels coming into service within the Royal Australian Navy's fleet.

Navantia Australia's core business is through the Designer Support Contract. We provide comprehensive design and engineering support for Navantia-designed ships in service with the Royal Australian Navy, acting as the Platform Design Agent delivering Design Engineering Services, Waterfront Engineering activities, and Integrated Platform Management Systems Services to the Commonwealth of Australia. The DSC consolidates prior support contracts into one arrangement, with intended benefits including design integrity through sustainment, and opportunities to build sovereign engineering capability and innovation in Australia

Navantia Australia is also developing a number of digital innovation projects through its partnerships with the University of Technology Sydney, University of Tasmania, Royal Melbourne Institute of Technology, and Defence Science and Technology Group.

Navantia's operations support the Royal Australian Navy with design, integration, and other supporting services from Sydney, Melbourne, Henderson and Canberra, including:

- + **Darling Park, Sussex Street, Sydney:** Corporate headquarters
- + **Garden Island, Sydney**
- + **UTS Campus:** Research and development services
- + **Docklands Drive, Docklands, Melbourne:** Naval Design and Engineering Centre
- + **National Circuit, Barton, Canberra:** Corporate support
- + **Railway Terrace, Rockingham, WA:** Corporate Support

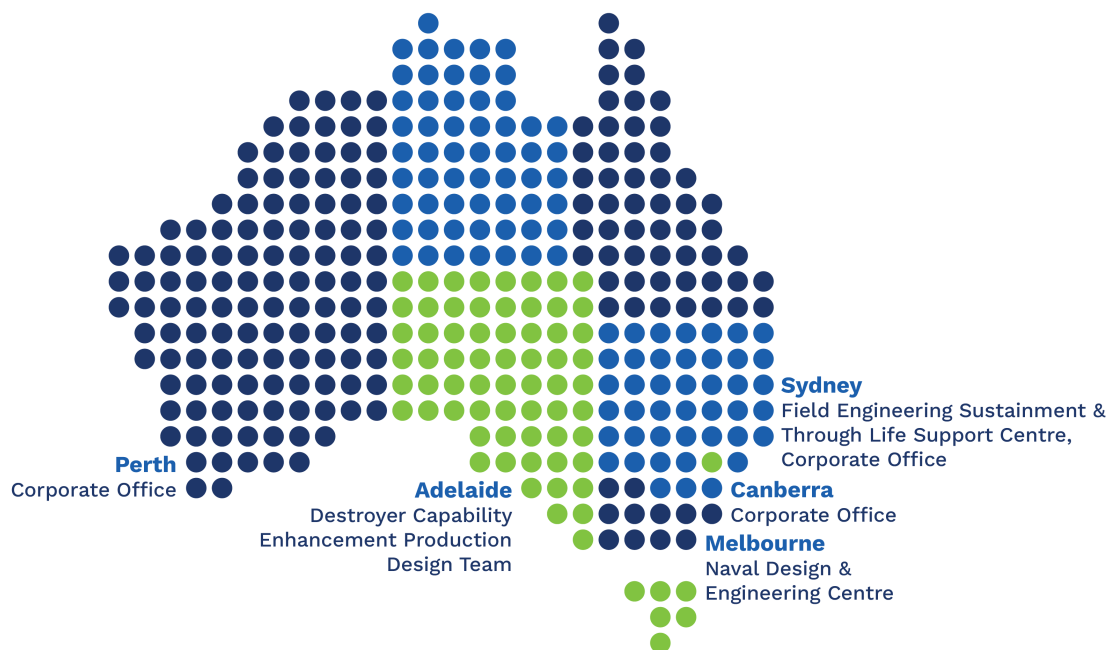


Figure 1: Navantia Australia Locations

We directly employ a skilled workforce of over 300 employees across Australia. At times Navantia Australia may send a small number of employees to work overseas on assignment or secondments. Any subcontractors engaged by Navantia Australia are from reputable Australian organisations and are engaged on short term contracts.

As per mandatory reporting requirement 6 of the Modern Slavery Act 2018, we advise that **we do not own or control any other entities for the 2025 reporting period** and therefore this criterion is not applicable.

3.1. MANAGEMENT STRUCTURE

The Executive Leadership Team comprises the statutory Directors and the Company Secretary of Navantia Australia, as well as other C-suite executive leaders from the key operational, delivery and support functions.

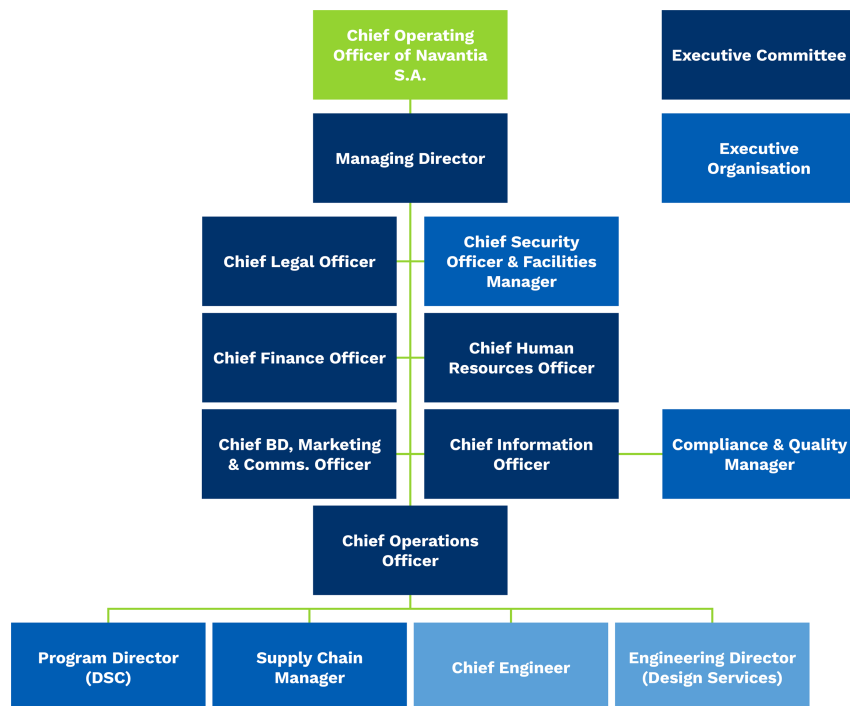


Figure 2: Navantia Australia's Management Structure

3.2. GOVERNANCE STRUCTURE

GOVERNANCE OF 2025 STATEMENT

During this reporting period, members of the Environment, Sustainable and Governance (ESG) Committee of Navantia Australia worked on this Statement. The ESG Committee is comprised of members from Quality and Risk, Supply Chain, Commercial and Legal, Human Resources and Business Development & Communications teams. The ESG Committee's has reviewed the 2025 statement to ensure appropriate compliance measures were taken.

During 2025, the Quality and Risk team engaged all-staff through a campaign, calling for staff to provide suggestions on how to improve our 2026 Modern Slavery Campaign.

ONGOING GOVERNANCE

Navantia Australia's oversight and governance is provided by the Executive Committee, which approves this Statement.

Navantia Australia' ongoing compliance will be the day-to-day responsibility of the Quality and Risk team lead by the Quality and Compliance Manager, working in close collaboration with the Head of Commercial and Legal.

3.3. SUPPLY CHAIN

Navantia Australia considers its Supply Chain to be the collection of any third-party provider of Products or Services.

Through its supply chain analysis, Navantia Australia has identified a total of 289 Tier 1 Suppliers, a reduction of 56 suppliers from previous reporting period (Navantia Australia defines Tier 1 as being a third-party company providing Products or Services directly, without a middleman or other manufacturer).

Navantia Australia has segmented the data on geographical and industry basis which is discussed further in section 4.2.

Supplier by Country of Origin	
Country	#
Australia	251
Spain	25
Netherlands	2
Norway	1
Germany	1
Singapore	1
United States	5
International	3
Total	289



Suppliers by Industry	
Industry	#
Marine/engineering services	50
Manufacture of industrial system/ product	34
Compliance/testing and consulting service	26
ICT/Software/Communication development/services	25
Supplier of industrial system/product/services	23
Education/Training	16
Associations	13
Marketing/Media production	12
Logistic/Transportation/Packaging services	10
Electronic/electrical devices/services	8
Property and Real Estate	8
Office/Corporate services	7
Event management	6
Merchandised/promotion product	5
Recruitment agency	4
Immigration/Visa services	3
Defence system and equipment	3
Clothing	3
Retail	3
Cleaning services	3
Emergency/medical services	3
Security services	2
Insurance	2
Waste Management service	2
Scientific research and development	2
Public Administration	2
Construction	2
Charity	2
Maintenance services	2
Food/Catering	1
Political Party	1
Energy supplier	1
Counselling	1
Veteran support services	1

4. RISK OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAIN

4.1. RISK TO NAVANTIA AUSTRALIA'S OPERATIONS

Navantia Australia's Quality and Risk team has conducted a thorough self-assessment of its operations, evaluating the risk of modern slavery against several key criteria.

LOCATION

As an Australian-based company and a subsidiary of Navantia Spain, we are located in regions that are considered low-risk according to the *Global Slavery Index*.

INDUSTRY

Navantia Australia does not belong to a high-risk industry. The services we provide are highly specialised and strategic to the industry of naval defence and ship design. Navantia Australia is required to adhere to a comprehensive range of regulations and standards. As part of its compliance, the company mandates that all employees be either Australian citizens, permanent residents, or, in the case of expatriates, possess the legal right to work in Australia.

EMPLOYMENT CONDITIONS

Our commitment to human rights and a safe workplace is demonstrated through our Code of Conduct, induction training, and WHSE policy. All Navantia Australia workers understand their duties and their pay through position descriptions and letters of offer which employment conditions are governed by the *Fair Work Act* legislation.

CONTRACT COMPLIANCE

We acknowledge that obtaining visibility on our Tier 2 and 3 suppliers is going to be a continued risk and is recorded as such. This is a continued activity for Navantia Australia as we strive to improve in 2026.

TRAINING AND AWARENESS

In 2025, the Quality and Risk team raised awareness through an all-staff campaign, calling for staff to provide suggestions on how to improve our 2026 Modern Slavery Campaign.

POLICY COMMITMENT

Our dedication to preventing modern slavery is exemplified by the inclusion of specific provisions in our 2024 Code of Conduct, which explicitly state our zero-tolerance stance towards modern slavery. The CoC was updated in 2025, but no updates were made to our modern slavery content.

The Code of Conduct includes our Ethical Partnering Framework, and Navantia Australia's Modern Slavery Statement. We acknowledge that we will continue to improve the comprehensiveness of our monitoring, corrective, and mitigation actions. As outlined above, the Quality Risk Team has assessed Navantia Australia and we consider any risks to modern slavery **low**.

4.2. NAVANTIA AUSTRALIA'S TIER 1 SUPPLIERS

The Quality and Risk team has undertaken an assessment of tier 1 suppliers in our supply chain. These assessments are based on our geographical risk and product and services risk.

RISKS DEFINED BY GEOGRAPHY

The location of international suppliers is based on the *Walk Free Foundations' Global Slavery Index*² ratings of Prevalence, Vulnerability, and government response to the risk of modern slavery within that country.

Over 99% of our Tier 1 suppliers are in Australia, the United Kingdom, the European Union, and North America. None of Navantia Australia's Tier 1 Suppliers are situated in regions identified as high-risk for modern slavery, with less than 1% considered medium risk for modern slavery.

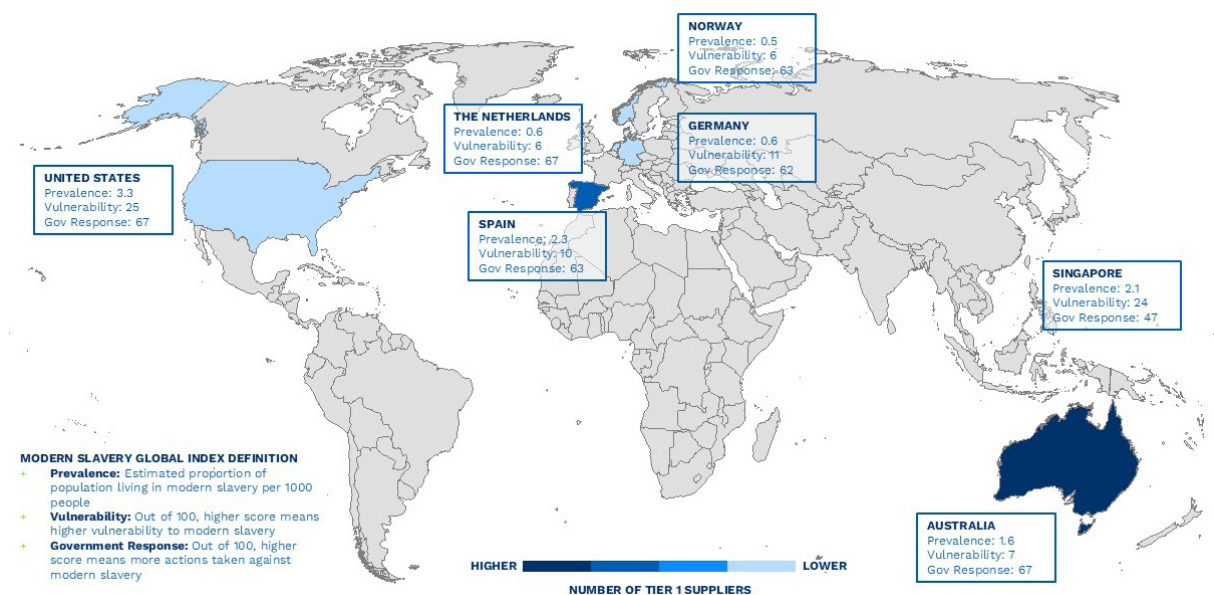


Figure 3: Location of Suppliers Around the Globe

² Global Slavery Index, Walk Free Foundation

RISKS DEFINED BY PRODUCTS AND SERVICES

In our strategic approach to risk management, we categorised risks based on products and services provided by our Tier 1 Suppliers. This considered the characteristics of sectors identified as being high risk by the Walk Free Foundation³, a leading authority on modern slavery. For non-high-risk suppliers we established a bespoke framework between low risk and medium risk suppliers, tailoring our assessment accordingly.

For the purpose of the report only our high-risk suppliers defined by products and services have been identified

HIGH RISK

- + Industry that provides product/services that are informal, not for resale, less regulated, with potential low paying workforce, and little visibility over lower tier Suppliers.
- + Vendors of products whose production occurred in geographies identified at risk in the 2018 Global Slavery Index published by the Walk Free foundation.
- + Industry that uses disadvantaged immigrant workers with low levels of autonomy and a high risk of exploitation, due to compensation not being in accordance with industry award minimum standards.



Figure 4: High Risk Industries in Navantia Australia Supply Chain

³ <https://www.walkfree.org/global-slavery-index/map/>

IDENTIFIED AREAS OF HIGHEST RISK IN AUSTRALIA

Taking the risk assessment into account, the following high risk area of material supply within its supply chain were identified. High-risk suppliers in Navantia Australia is at 9% of all Tier 1 Suppliers, with new high-risk industries identified in 2025 being clothing.

Clothing is perceived as higher risk due to the sourcing of materials and manufacturing from countries with increased levels of modern slavery. While high risk areas for materials have been identified, our Tier 1 suppliers are in geographical locations which have a low risk assessment for modern slavery.

5. ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Navantia Australia is steadfast in its commitment to eradicating modern slavery and human trafficking. Upholding the Modern Slavery Act 2018, we expect every member of our workforce, including employees, contractors, and suppliers, to embody our core Values of 'Ethical Behaviour' and 'Accountability.' Our Code of Conduct, policies and operational procedures are meticulously crafted to reflect these values, incorporating stringent anti-corruption and anti-bribery protocols, as well as comprehensive guidelines on gifts, benefits, and conflicts of interest. We ensure the ongoing relevance and effectiveness of our policies through regular reviews. All of our workforce as identified above are required to adhere to our Code of Conduct, Values, policies and procedures.

Our proactive stance is further demonstrated by our Ethical Partnering Page on SharePoint, which details our modern slavery risk assessment findings and outline additional control and mitigation strategies. This is a testament to our unwavering dedication to ethical business practices and our continuous efforts to address modern slavery risks.



Figure 5: Navantia Australia Code of Conduct Principles



Figure 6: Navantia Australia Core Values

5.1. WHAT WE ACHIEVED IN 2025 MITIGATING MODERN SLAVERY RISKS

Governance	Environmental, Society and Governance Committee 1. Chief of Human Resources 2. Chief Legal Officer – Head of Commercial and Legal 3. WHSE Manager 4. Manager of Quality and Compliance
	Navantia Australia Procurement Policy included the Supplier Review Committee to ensure ethical conduct of suppliers.
	Second and Third line audits of our internal supply chain and processes to confirm adherence of our processes and on-boarding of suppliers.
	Regular Risk Reviews with Supply Chain Manager and Senior Procurement Officer, as well as with the Supplier Review Committee.
Training & Education	Awareness Campaign to all staff asking for suggestions to improve our 2026 campaign.
	Monitored a compliance portal on SharePoint as well as our website, allowing a report of Modern Slavery to be appropriately dealt with.
Due Dilligence	Risk based assessment based on geographical location (tier 1) .
	Risk based assessment based on industry (tier 1).
	Audited 6 companies around their compliance to Modern Slavery requirements developed by Navantia Australia.
Industry Contact	Engagement through audits and desktop assessments with suppliers. Key Navantia Australia personnel attending industry events.
	Investigating the possibility of contracting a third party to assist in supplier governance.



MODERN SLAVERY WHISTLEBLOWER REPORTING ESCALATION PROCESS

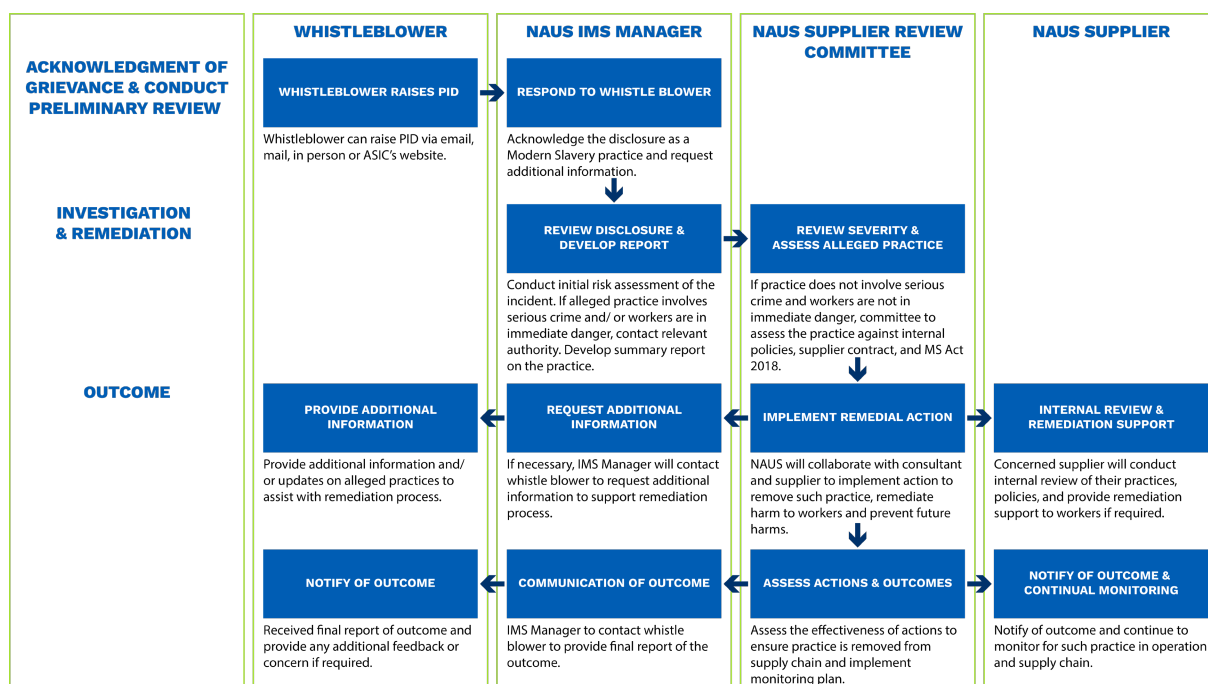


Figure 6: Modern Slavery Reporting Process

Our Whistleblowing channel is 24/7 and available to third parties to raise concerns around modern slavery. Details of our Public Interest Disclosure are posted on our website and intranet, should a report of modern slavery be raised it will be discussed with the Supplier Review Committee for further action. If modern slavery is discovered within our supply chain, we would refer to the relevant authorities and cooperate fully.



Figure 7: Supplier Due Dilligence

Our supplier due diligence process occurs for all new third parties we engage through our procurement process. This requires Navantia Australia to assess the company in accordance with our compliance/procurement frameworks, assessing relevant risks around bribery and corruption risks, as well as the company's financial viability and their technical capabilities.

In accordance with our procurement process, Navantia Australia will gather additional information through supplier questionnaires when first engaging the company to provide services.

Should any company be assessed as high risk from the information provided by the company, they will be further assessed through either an audit or desktop assessment. During this assessment one of the tools the audit team will use is our bespoke modern slavery risk matrix criteria. Should the supplier not meet satisfactory requirements of further due diligence they will not be further engaged.

5.2. MEASURING EFFECTIVENESS OF ACTIONS BEING TAKEN

We regularly review and assess the effectiveness of our policies and procedures as part of our global and local assurance, audit and risk frameworks.

	Objectives and Measures	2025 KPI
Navantia Compensation	Objective: 100% of Navantia staff around the globe receive fair and lawful compensation that meets or exceeds the minimum requirements required by local law. Measure: Navantia staff are compensated at or above the minimum wage requirements established by local laws in each jurisdiction where the company operates.	It is confirmed that 100% of personnel employed by the Navantia Corporation were compensated no less than that required under local law.
Supplier Management (desktop assessments & audits)	Objective: Discover further information/compliance about suppliers' response to modern slavery. Provide opportunities for improvement to enhance ethical business practices against modern slavery, industry engagement and identify any companies who are high risk to modern slavery. Measure 1: Number of audits and desktop assessments undertaken by Quality & Risk Team. Measure 2: Identification of suppliers as high risk for modern slavery or evidence of modern slavery.	6 audits/assessments 0 instances identified modern slavery. 4 Opportunities for Improvement (OFIs) identified for audited Supplier companies, included a need for modern slavery policy, the absence of processes for remediation and managing modern slavery, and the lack of a supplier evaluation process.
Training	Objective: To undertake an awareness campaign to Navantia Australia staff Measure: Number of suggestions from staff to improve the 2026 Navantia Australia Modern Slavery Statement.	Development of actionable plans or commitments by Navantia Australia from staff suggestions for 2026.
Whistleblower Channel for Modern Slavery	Objective: Confidential avenue to receive any reports of modern slavery without fear of retaliation. Measure: Number of calls/emails to our whistleblowing channel identifying modern slavery.	0 Whistleblower reports.

Actions will be measured at the end of each year as part of our Modern Slavery Statement.

5.3. FUTURE ACTIONS TO BE TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

In year 2026, we have identified the following actions.

- + Update standard terms to include obligations regarding modern slavery with which all suppliers and subcontractors must comply, that will apply to all new contracts;
- + Request our Technology Partner Network to confirm compliance with the protocols to combat modern slavery;
- + Conduct supplier audits and risk assessment on Modern Slavery. Further investigating their supply chains;
- + Map and assess Navantia Australia's supply chain on an ongoing basis;
- + Continue supplier audit as part of an annual process;
- + Exercise due diligence in educating suppliers and identifying Modern Slavery risks in our supply chain;
- + Promote Whistleblower Channel to the organisation and its use.

6. CONCLUSION

This Statement for the reporting year ending 31 December 2025 is made pursuant to section 13 of the Modern Slavery Act 2018 (Cth).

It was approved by the Board of Directors of Navantia Australia on 19 June 2026.

