



**LOCKHEED MARTIN AUSTRALIA PTY LTD**

and

**SIKORSKY AIRCRAFT AUSTRALIA LIMITED**

**STATEMENT ON SUPPLY CHAIN  
TRANSPARENCY CONCERNING  
MODERN SLAVERY**

## 1. Reporting Entities

**Lockheed Martin Australia Pty Ltd** (ACN 008425509) of 8 Brisbane Avenue, Barton ACT

**Sikorsky Aircraft Australia Limited** (ACN 003 031 <sup>9</sup>509) of 29 Wugan Street, Yerrilyong NSW

## 2. Introduction

Lockheed Martin Australia Pty Limited (*LMA*) and Sikorsky Aircraft Australia Limited (*SAAL*) firmly upholds our commitment to respect human rights within our operations and supply chains. We recognise this responsibility as integral to our corporate citizenship and the sustained prosperity of the company. Aligned with the core values of our parent, Lockheed Martin Corporation - “Do What’s Right”, “Respect Others” and “Perform with Excellence” – we strive to embed respect for human rights in all our actions. We anticipate that our business partners and suppliers will mirror these values, fostering and ethical and transparent supply chain ecosystem. This Statement on Supply Chain Transparency concerning Modern Slavery underscores our unwavering dedication to combating Modern Slavery and promoting ethical business practices.

## 3. Structure, Operations and Supply Chains of Reporting Entities

### 3.1 Structures and Operations

Lockheed Martin Australia Pty Limited (*LMA*) and Sikorsky Aircraft Australia Limited (*SAAL*) are wholly owned subsidiaries of Lockheed Martin Corporation, headquartered in Bethesda, Maryland, United States. LMA, headquartered in Canberra, Australian Capital Territory, specialises in the integration and sustainment of advanced technology systems, and products & services across space, air, land, sea and cyber domains. Conversely, SAAL, headquartered in Nowra, New South Wales, specialises in Airframe, Component and Rotor Blade maintenance, repair and overhaul complemented by Design Engineering, Material Sales and Maintenance Training.

Beyond their respective headquarters, LMA and SAAL maintain operational presence across various Australian locations, as illustrated in the below diagram.



Figure 1: LMA and SAAL locations within Australia

Lockheed Martin Corporation maintains comprehensive anti-trafficking policies, including a Human Trafficking summary statement, accessible on its official website. Both LMA and SAAL are obligated to comply with these corporate policies.

The *Modern Slavery Act 2018* (Cth) (*the Act*) mandates commercial entities disclose their anti-slavery policies and related actions taken within the preceding financial year to prevent slavery and human trafficking within their operations and supply chains. LMA and SAAL are steadfast in their commitment to ensuring that their employees and suppliers implement necessary measures to eliminate the risk of Modern Slavery across all facets of their business and supply chains. The ensuing information is furnished in compliance with the Act's requirements.

### 3.2 LMA & SAAL Supply Chain

LMA and SAAL, collectively operate in Australia employing over 1600 people, collaborating with an approximate 1200 Australian suppliers. The procurement landscape predominately involves sophisticated technical equipment and specialised professional services, reflecting the nature of our advanced technology systems and services. This extensive network underscores our commitment to fostering robust, ethical business relationships while maintaining transparency in our supply chain operations.

## 4. Risks of Modern Slavery Practices

Neither LMA or SAAL have currently source products or services from suppliers in geographically high-risk areas. Our international partners hail from nations deemed low risk concerning Modern Slavery legislation violations, encompassing the United States, United Kingdom, Canada, New Zealand, Italy and Germany.

To ensure compliance with Modern Slavery requirements across our supply chain, LMA and SAAL employ a risk-based analysis and phased approach as outlined below:

1. Develop an overall LMA supplier risk assessment.
2. Review global and local policies to identify any gaps pertaining to Modern Slavery requirements.
3. Identify and analyse existing suppliers to prioritise application of high-risk assessment.
4. Apply the risk assessment to all suppliers including updating supplier checklists as necessary.

This meticulous analysis has yielded an overall assessment of the Modern Slavery risk within the LMA and SAAL supply chains as low, reflecting our unwavering commitment to ethical business practices.

## 5. Actions Taken to Address Risks of Modern Slavery Practices

### 5.1 Supply Chain Verification

LMA and SAAL employ multiple verification methods to ensure the integrity of our supply chains, such as site evaluations, inspections and verification of government debarments and denied parties lists. As a contractual requirement, all suppliers must commit to adhering to all applicable laws and regulations. Furthermore, our standard contract templates incorporate specific clauses that specifically address Modern Slavery requirements for suppliers.

### 5.2 Supplier Compliance Evaluation and Audits

To assess the risk of Modern Slavery within potential suppliers, LMA and SAAL mandate that suppliers complete a comprehensive questionnaire. This questionnaire probes various aspects of the supplier's organisation and supply chain to gauge potential vulnerabilities. As part of the standard evaluation process, procurement teams meticulously review supplier responses to assess compliance with specific human trafficking and Modern slavery standards. These responses are diligently recorded for future reference.

To bolster our commitment to combating Modern Slavery, LMA and SAAL have established a Modern Slavery Working Group and Sub Working Group. Comprising of key personnel from diverse functional areas including Commercial, Procurement, Legal, Human Resources, Ethics and Communications, these groups regularly convene to scrutinise the effectiveness of our current processes for evaluating supplier compliance and to review LMA's and SAAL's Modern Slavery policies and processes.

### 5.3 Ethics Helpline and Reporting Mechanism

Lockheed Martin offers an ethics helpline at (US: 1-800-LM-ETHIC; international users should dial their country's exit code first) for reporting any conduct contrary to the principles outlined in Lockheed Martin's Code of Conduct "Setting the Standard". This helpline number is included in all supply contracts, encouraging open communication and vigilance against unethical practices. LMA and SAAL promptly investigates all reported matters and takes appropriate action, including disclosure to relevant governmental authorities when necessary. This robust reporting mechanism underscores our dedication to maintaining a transparent, ethical and Modern Slavery-free supply chain.

### 5.4 Supplier Certification

As a prerequisite for contracts, all suppliers are required to pledge their commitment to comply with applicable laws and regulations, including the Act.

### 5.5 Supplier Code of Conduct

LMA and SAAL have established a comprehensive Supplier Code of Conduct, which outlines the core principles we expect our suppliers to uphold. The Code of Conduct encompasses the following provisions:

- **Human Rights**

LMA and SAAL expects our suppliers treat individuals with respect and dignity, encourage diverse viewpoints, champion equal opportunities for all, and contribute to an inclusive and ethical work environment.

- **Human Trafficking**

Our suppliers must categorically refrain from engaging in forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, or human trafficking. This prohibition extends to the transportation, harbouring, recruitment,

transfer, or receipt of vulnerable individuals through force, coercion, abduction, or fraud for exploitative purposes.

- **Child Labour**

Our suppliers must categorically refrain from using child labour in the execution of work. The term “child” pertains to any person below the minimum legal employment age in the jurisdiction where the work is performed.

By adhering to these stringent guidelines, we strive to maintain an ethical and transparent supply chain that respects human rights and combats Modern Slavery.

## **5.6 Internal Accountability Standards**

LMA and SAAL uphold stringent internal accountability standards and procedures to address any employee or contractor shortcomings concerning Modern Slavery and human trafficking. Several internal policies enforce this commitment, with the Corporate Policy Statement, Good Corporate Citizenship and Respect for Human Rights serving as a prime example. This policy underscores our dedication to enhancing the global society in which we operate, fostering technological and economic development, maintaining transparency and fulfilling our promises to stakeholders, including customers, stockholders, employees, partners, suppliers, and communities. Simultaneously, we strive to minimise any adverse impacts of our business activities.

To encourage open communication and vigilance, LMA and SAAL have established procedures enabling employees to report suspected Modern Slavery-related activities, without fear of retaliation. Upon substantiating violations involving employees, we promptly administer appropriate disciplinary measures. In cases where the supplier involvement is confirmed, we reserve the right to take decisive action including termination of contracts, to uphold our commitment to ethical business practices and human rights.

## **5.7 Employee Training**

LMA has developed training programs for recruiters to ensure compliance with our stringent Modern Slavery and human trafficking standards. These modules encompass various critical areas, including:

- Child or forced labour.
- Trafficking of individuals.
- Adherence to labour laws.
- Truthful and trustworthy recruitment practices.

- Proper disclosure of information, and accurate representations during the recruitment process including key terms and conditions of employment, wages, fringe benefits, work location, housing, and nature of work.

LMA is developing specific training focused on its human resources, commercial, procurement and supply chain management teams to specifically address the Act and help equip its teams with knowledge designed to implement the company's risk-based assessment approach. All LMA and SAAL staff are required to participate in mandatory training centered around our Code of Conduct. This training covers essential components of Modern Slavery such as Human Trafficking, Human Rights and Child Labour, ensuring that our workforce remains well-informed and vigilant in upholding our ethical standards and commitment to human rights.

## 6. Further Development and Reassessment

LMA's and SAAL's key stakeholders routinely convene to scrutinize, reassess, and further refine our Modern Slavery approach, ensuring not only statutory compliance but also alignment with Lockheed Martin Corporation's core values: "Do What's Right", "Respect Others" and "Perform with Excellence".

In the past reporting period LMA and SAAL have reviewed and updated its Australian Acquisition Procedures to include Modern Slavery requirements. This update, provided by its Australian Acquisition Procedures Council, applies to all acquisitions across LMA and SAAL and provides a more consistent approach across the companies in relation to Modern Slavery.

## 7. Consultation

While LMA and SAAL are separate wholly owned subsidiaries of Lockheed Martin Corporation, several resources and support functions are shared between the companies. The reviews and assessments described above were undertaken on behalf of both LMA and SAAL by shared corporate staff. Further, the policies and procedures and Codes of Conduct developed by Lockheed Martin Corporation are applicable to LMA, SAAL and their supply chains.

## 8. Any other relevant information

LMA and SAAL will actively review its approach to Modern Slavery and is open to any best practice that it can adopt to enhance its own developing policies and procedures.

## 9. Approvals

This Modern Slavery statement was reviewed by the board of directors of LMA. The board has resolved to approve this statement, authorise Warren McDonald to sign the statement on behalf of LMA and direct the company to lodge this statement as required by the Act.

This Modern Slavery statement was reviewed by the board of directors of SAAL. The board has resolved to approve this statement, authorise Warren McDonald to sign the statement on behalf of LMA and direct the company to lodge this statement as required by the Act.

Signed,

Signed by:  
  
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6/26/2025

**Warren McDonald**

Chief Executive, Lockheed Martin Australia Pty Limited  
Director, Sikorsky Aircraft Australia Limited