

Cohort plc

Modern Slavery Statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the “MSA”) with respect to Cohort plc’s financial year ended 30 April 2016.

How is the Group structured?

Cohort plc is quoted on AIM and has its registered office in Theale, Reading. During the financial year ended 30 April 2016, it was the parent company of four subsidiaries (together, the “Group”) working primarily for defence, wider government and industry clients:

Subsidiary	Business Structure	Location
MASS	A specialist defence and technology business, focused mainly on electronic warfare, information systems and cyber security. MASS has four specialist business units: Cyber Security, Electronic Warfare Operational Support, Secure Information Systems and Strategic Systems.	St Neots and Lincoln
MCL	An expert in sourcing, design and integration of communications and surveillance technology, as well as support and training for UK end users including the MOD and other government agencies.	Horley
SCS	A defence consultancy, combining technical expertise with armed forces experience and domain knowledge. SCS operates three business units: Air Systems, Capability Development and Training Support.	Theale
SEA	An advanced electronic systems and software house operating in the defence, transport and offshore energy markets. SEA is comprised of four business units: Maritime Defence, Research and Technical Support, Software Solutions and Products and Subsea Engineering.	Bristol, Barnstaple and Aberdeen

The Group sources its goods primarily from low risk countries such as Canada, Denmark, France, Norway, the United Kingdom and the United States.

The Group’s Anti-Slavery Policy

Cohort plc adopted an Anti-Slavery Policy (the “Policy”) during the financial year. The Policy reiterates the ethical conduct already expected of the Group and sets out the measures that the subsidiaries must take to ensure that slavery and human trafficking are not taking place within their businesses and supply chains.

Each subsidiary is required to produce an annual report to the Board of Cohort plc including 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 to mitigate those risks and 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 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 respective 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 reporting service (‘whistleblowing’) which is available to all employees.

The Policy will be reviewed annually by the Cohort plc Board of Directors.

The Group’s due diligence processes

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 2016.

Cohort plc

The reports confirm that the subsidiaries have undertaken proportionate due diligence during the financial year. This has involved identifying the highest risk suppliers in terms of annual spend, sector risk and country risk. Letters have been sent to the highest risk suppliers setting out the obligations of the subsidiary and the supplier under the MSA and requesting the supplier 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.

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.

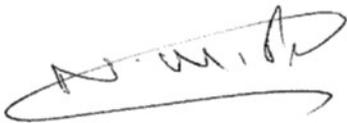
Does the Group provide training for its employees?

The Group provides online anti-slavery training. Each subsidiary is responsible for ensuring that relevant employees receive anti-slavery training.

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 robust and effective.

Approved by the Cohort plc Board of Directors on 5 July 2016.



Nick Prest
Chairman
Cohort plc