

VIA E-MAIL: [momensah@transparency.org](mailto:momensah@transparency.org), [dc@transparency.org](mailto:dc@transparency.org)

Michael Ofori-Mensah  
Head of Research  
Transparency International Defence & Security  
Defence Companies Index Team  
10 Queen Street Place  
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Date: 13 February 2023

Dear Mr Ofori-Mensah

**GKN Aerospace Services Limited ("GKNA") – response to Defence Companies Index 2020**

We refer to the Transparency International Defence Companies Index 2020 (the "Index") and to our previous communication with Transparency International Defence & Security about its assessment of GKNA's anti-bribery and corruption compliance programme.

Transparency International - Defence & Security's assessment of a company's anti-bribery and corruption record is primarily based on information published on a company's website. At the time of the assessment for the 2020 iteration of the Index, GKNA had in place an anti-bribery and corruption programme and processes for receiving and investigating whistleblowing reports, but GKNA received a low transparency score from Transparency International Defence & Security due to the procedures and approach not being fully detailed on GKNA's website.

We understand and support the objective of transparency of approach and GKNA has, since the publication of the Index, published its anti-bribery and other compliance and speak-up policies on GKNA's website under a dedicated Ethics and Compliance section (see [www.gknaerospace.com/en/sustainability/ethics-compliance/](http://www.gknaerospace.com/en/sustainability/ethics-compliance/)). The policies are underpinned and supported by employee engagement, risk assessments, communications and training, third party due diligence processes, financial controls, a whistleblowing process, and a corporate governance and review framework.

GKNA is committed to the highest standard of ethical conduct and does not tolerate corrupt practices of any kind. We looked forward to future engagement with Transparency International Defence & Security and the next iteration of the Index.

Yours sincerely



**Julie Smyth**  
**General Counsel**  
**for GKN Aerospace Services Ltd.**