

Modern Slavery Statement 1 January 2022 – 31 December 2022

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1 Ultra policy statement

This statement is issued pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ultra’s Modern Slavery Statement for the period commencing 1 January 2022 and ending 31 December 2022 in accordance with the UK Government single reporting deadline mandatory requirement.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, labour exploitation and human trafficking collectively referred to as ‘modern slavery’ in this statement. These have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. Ultra and our subsidiaries (Ultra) have a zero-tolerance approach to modern slavery in any form.

Ultra is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to support prevention of modern slavery occurring in our business or in any of our supply chains.

2 Our structure

Ultra’s Head Office is in the UK, and we have other global offices and facilities predominantly in the USA, Australia, and Canada. Ultra Electronics UK Holdings Limited is the main operating parent company, based in the UK.



3 Our businesses

Ultra provides application-engineered solutions in the key elements of mission critical and intelligent systems. Through innovative problem solving, using sustainable capabilities, and evolving technologies, Ultra delivers outstanding solutions to our customers' most complex challenges in defence, security, critical detection, and control environments.

Ultra is organised into five business divisions:

1. **Maritime** delivers mission systems and application engineering solutions operated by naval fleets across the US, UK, and allied navies worldwide. Developing advanced specialist systems to deliver warfighting edge in the modern maritime and underwater battlespace, solutions provide critical operational advantages to 'five-eyes' defence customers (UK, USA, Canada, Australia, New Zealand) across surface, sub-surface, and unmanned platforms.
2. **Intelligence and Communications** delivers mission critical, multi-domain communications, command and control, cyber security, and electronic warfare solutions to defence customers (UK, USA, Canada) to inform decision making in the most challenging environments.
3. **Precision Control Systems** designs and supplies market-leading safety and mission critical solutions to the military and commercial aerospace markets.
4. **Forensic Technology** is a world-leader in ballistic identification and forensic analysis solutions that help law enforcement agencies around the world to prevent and solve crime.
5. **Energy** focusses on the supply of nuclear safety sensors and systems as well as selected industrial applications, predominantly in the UK, North America, and China.

4 Our supply chains

Each business division operates autonomously and holds responsibility for management of their respective supply chains. Policy and guidance are provided centrally from Head Office. Ultra is committed to ensuring transparency in our business and in our approach to tackling modern slavery throughout our supply chains.

Ultra has a low dependency on goods and services from suppliers that present a high modern slavery risk. The goods and services procured by Ultra businesses are predominantly Commercial Off The Shelf (COTS) products, high-end technology, or consultancy/professional services from North America, the UK, Australia, or other lower risk territories.

The following steps taken by Ultra support prevention of modern slavery in Ultra's supply chains:



- ⊕ Determining and maintaining acceptable procedures for supplier pre-qualification.
- ⊕ Ongoing assessment of modern slavery risks based on high country risks and high sector risks.
- ⊕ Maintaining a central Modern Slavery and Human Trafficking policy.
- ⊕ Providing mechanisms for discussing and recording if occurrences of modern slavery are identified and determining actions to prevent future incidences.
- ⊕ Developing and introducing training in identifying modern slavery across the supply chain for relevant employees and contingent workers.

5 Our policies

Although ultimate responsibility for the implementation of the Modern Slavery and Human Trafficking Policy lies with the Ultra Board of Directors, this requirement has been delegated to business division Presidents who are responsible for the implementation and control of the policy and monitoring compliance within their respective businesses and for ensuring risk assessment of suppliers is effectively managed.

Presidents ensure that:

- ⊕ Their business has in place systems to: identify and assess potential risks of modern slavery in their business and their supply chains; mitigate the risk of modern slavery occurring in their business and supply chains; and monitor potential risk areas in their business and supply chains.
- ⊕ Terms and conditions of purchase and associated purchasing documentation forbidding the use of modern slavery practices are adopted by their business with the right to terminate a relationship with a supplier if issues of non-compliance are discovered and/or non-compliance is not addressed in a timely manner.
- ⊕ Ensuring the Ultra global Supplier Code of Conduct is issued to all suppliers, contractors, and business partners at the outset of the business relationship and reinforced frequently thereafter.
- ⊕ Identified risks are escalated to Group in a timely manner.

6 Communication

Ultra expects all suppliers to conduct business in an ethical, safe, and sustainable way and to comply with all applicable laws and regulations. Ultra communicates standards and expectations to suppliers in the following ways:

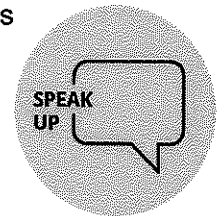
- ⊕ Ultra global Supplier Code of Conduct.
- ⊕ Commercial contracts, terms and purchasing documentation.



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- ⊕ Adding/pre-qualifying suppliers to its vendor base.
- ⊕ Conducting audits or visits to supplier sites when deemed necessary.
- ⊕ Engaging with suppliers when conducting business activity.

Ultra operates an independent, anonymous, and confidential reporting platform. The “Speak Up” platform is a global channel for any person who works for or with Ultra in any capacity to ask questions and report concerns they believe are a violation of the Ultra Codes of Conduct including those relating to modern slavery and human trafficking.



7 Training

Business leaders hold responsibility for providing adequate and regular training to employees and contingent workers to ensure understanding of the risks of modern slavery and human trafficking occurring in their business and supply chains. This is supported by a comprehensive global compliance training program with Ultra employees and contingent workers attending training covering topics included in the Ultra Code of Conduct during induction and via regular refresher sessions. Our Procurement teams in each business are aware of the Home Office Modern Slavery Awareness and Victim Identification Guidance.

Ultra has a global Ultra Supplier Code of Conduct. Suppliers commit to providing regular training to their employees including all minimum standards and requirements mandated by Ultra. In the scope of the code Ultra pledges to collaborate with suppliers providing necessary support to reach compliance with the code. Our Ultra Code of Conduct reinforces that businesses are responsible for ensuring that suppliers and other partners operate with integrity and to high ethical standards.

8 Measuring effectiveness

The effectiveness of Ultra’s modern slavery policies is measured by:

- ⊕ Business compliance with the Modern Slavery and Human Trafficking Policy.
- ⊕ Rolling refresh of business risk assessments to ensure any changes in the profile of supply chain risks are considered, assessed, and appropriately managed.
- ⊕ Review of the commercial terms and conditions and purchasing documentation.
- ⊕ Review of due diligence processes adopted by businesses and training that has taken place in each business.
- ⊕ Recording and monitoring modern slavery incidents (if any) within Ultra’s supply chains and, where necessary, developing corrective measures.



9 Progress since last statement

During the reporting period Ultra addressed the following actions recorded in the previous statement:

- ⊕ Continued to promote the global Supplier Code of Conduct setting out minimum standards and expectations for suppliers and the broader supply chain. The code reinforces Ultra's zero-tolerance of inappropriate business conduct, explicitly slavery, human trafficking, and labour exploitation in any form.
- ⊕ Met our target to sign-up Ultra's top thirty suppliers by spend to the new global Supplier Code of Conduct by the end of 2022.
- ⊕ Hosted an independent, anonymous, and confidential reporting platform 'Speak Up' to enable any person to ask questions and report concerns they believe are a violation of Ultra's Codes of Conduct.
- ⊕ Continued to advocate the Group Modern Slavery and Human Trafficking Policy.

10 Goals for the next reporting period

During the next reporting period we plan to:

- ⊕ Ensure all new employees and contingent workers undertake Code of Conduct training via the Ultra HR learning management system.
- ⊕ Continue to screen new suppliers and audit existing suppliers to ensure compliance with prevailing legislation in the countries where Ultra and the supplier/s operate.
- ⊕ Continue to review the feasibility of engaging with external parties or implement tools to support the evaluation and compliance of our key supply chain partners.

The board of directors of Ultra Electronics UK Holdings Limited approved this statement at the board meeting held on 23 May 2023.

Signed by Director: 

Dated: 12/6/23

