

ULTRA MARITIME

Modern Slavery Statement

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Ultra Maritime

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1 Ultra Maritime Policy Statement

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018, and constitutes Ultra Maritime's modern slavery statement for the period commencing 1 January 2024 and ending 31 December 2024 in accordance with the UK Government single reporting deadline mandatory requirement and the Australia Government annual reporting period.

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 in order to exploit them for personal or commercial gain. Ultra Maritime has a zero-tolerance approach to modern slavery in any form. Ultra Maritime 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 ensure modern slavery does not take place anywhere in our business or in any of our supply chains.

2 Our Structure

Ultra Electronics Holding Limited is the group parent company. Our Head Office is in Braintree, Massachusetts, and we have global offices and facilities located in the UK (Ultra Sonar Systems Limited, referred to herein as "UM UK"), USA (Ultra Maritime LLC and subsidiaries, referred to herein as "UM A2" and "UM S3"), Australia (Ultra Electronics Australia Pty Limited and subsidiaries, referred to herein as "UM AUS"), and Canada (Ultra Electronics Maritime Systems, Inc., referred to herein as "UM CAN"). Together, we will refer to these entities as Ultra Maritime.

3 Our Businesses

Ultra Maritime provides innovative multi-missions solutions for air, surface, sub-surface and unmanned platforms that protect and empower allied naval forces worldwide. Ultra Maritime employs more than 2,300 engineers and manufacturing experts worldwide, specializing in state-of-the-art sonar systems, radar and expendables.

Ultra Maritime is organised into five Lines of Businesses (LoB):

1. **Ultra Maritime Airborne Anti-Submarine Warfare** (UM A2) UM A2 is the world leader in the manufacturing of sonobuoy products, capable of delivering more than 250,000 sonobuoys annually. Driven by the increasing challenge to detect modern, quiet submarines, our range of Multi-static Active acoustics uses patterns of active source and passive receiver sonobuoys, along with advanced signal processing techniques to enhance submarine detection probability and increase area coverage.

2. **Ultra Maritime Australia** UM AUS delivers mission critical anti-submarine warfare solutions to defence customers to inform decision making in the most challenging environments.



3. **Ultra Maritime Canada (UM CAN)** UM CAN and supplies market-leading safety and mission critical solutions, such as towed arrays and other sonar capabilities.

4. **Ultra Maritime UK (UM UK)** provides undersea warfare solutions as leaders in acoustic technologies.

5. **Ultra Maritime Seaborne Sensors and Systems (UM S3)** UM S3 energy focuses on the supply of radar and electronic warfare sensors and systems to improve detection, navigation and situational awareness capabilities for our customers.

4 Our Supply Chains

Each LoB operates under its own leadership structure and holds responsibility for management of their respective supply chains. All LoBs share reporting requirements to a singular management team at a corporate level. Delegations of authority are in place from the parent company down to the LoBs.

Ultra Maritime is committed to ensuring transparency in our business and in our approach to address and prevent modern slavery from occurring throughout our supply chains. To this end, the topic is regularly discussed during board and other management meetings.

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

The following steps are taken by Ultra Maritime to prevent modern slavery occurring in Ultra Maritime'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
- Developing and maintaining a central Modern Slavery and Human Trafficking policy
- Providing forums for discussing and recording when occurrences of modern slavery are identified (if any) and determining actions to prevent future occurrences
- 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 Maritime Board of Directors, this requirement has been delegated to LoB management teams, directors, and officers 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.



Management teams 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 Maritime Supplier Code of Conduct is issued to all suppliers, contractors, and business partners at the outset of the business relationship and reinforced frequently thereafter.

6 Communication

Ultra Maritime expects the same high standards from all its contractors, suppliers, and other business partners and this is communicated:

- In commercial contracts and purchasing documentation with external organisations
- When adding/pre-qualifying suppliers to its vendor base
- When conducting audits or visits at supplier sites
- Via the Ultra Maritime Supplier Code of Conduct

Ultra Maritime has an independent, anonymous, and confidential reporting platform. Now known as 'Speak Up', this platform is a global channel for any individual who works for Ultra Maritime in any capacity to ask questions and report concerns they believe are a violation of the Ultra Maritime Code of Conduct including issues relating to modern slavery.

7 Training

Business leaders have responsibility for providing adequate and regular training to employees and contingent workers in their business to ensure a high level of understanding of the risks of modern slavery occurring in their business and supply chains.

Ultra Maritime and its board of directors provide advice, guidance, and training to teams with direct responsibility for supply chains. In addition, our UK Procurement teams in each business have been made aware of the UK Home Office Modern Slavery Awareness and Victim Identification Guidance.

During the reporting year Ultra Maritime has issued a Code of Conduct, applicable to all individuals who work with Ultra Maritime in any capacity. This code reinforces businesses are responsible for ensuring that suppliers and other partners operate with integrity and to high ethical standards. All employees and contingent workers receive training pertaining to the Ultra Maritime Code of Conduct during induction and via regular refresher sessions.



8 Measuring Effectiveness

The effectiveness of Ultra Maritime's modern slavery policies is measured in the following ways:

- 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 terms and conditions and purchasing documentation with suppliers
- 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 Maritime's supply chains and, where necessary, developing corrective measures.

Ultra Maritime's board of directors provide oversight and challenge to this measuring and review process.

9 Next Steps

During the next reporting period commencing 1 January 2026 ending 31 December 2026, we plan to:

- Review and update, if necessary, our Supplier Code of Conduct setting out minimum standards and expectations for suppliers and the broader supply chain. The code states Ultra Maritime's zero-tolerance of inappropriate business conduct, explicitly slavery, human trafficking, and labour exploitation in any form.
- Remind suppliers that Ultra Maritime maintains an independent, anonymous, and confidential reporting platform Speak Up to enable them to ask questions and report concerns they believe are a violation of the Ultra Maritime Supplier Code of Conduct.
- Continue to monitor our modern slavery supply chain risks and provide guidance where necessary.
- Continue to screen new suppliers and audit existing suppliers to ensure compliance with prevailing legislation in the countries where Ultra Maritime and the supplier/s operate meeting Ultra Maritime's commitment to audit key suppliers at least every two years.
- 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 Maritime approved this statement.

Signed:

A handwritten signature in black ink, appearing to read 'C Zaffanella'.

Name: Carlo Zaffanella
CEO and President