

Modern Slavery Statement

1 April 2021 – 31 March 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 April 2021 and ending 31 March 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 Electronics Holdings plc is the group parent company. Our Head Office is in the UK, and we have other global offices and facilities predominantly in the USA, Australia, and Canada.



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 Strategic Business Units (SBU):

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. The Maritime SBU comprises four Operational Business Units (OBU): Sonar Systems; Sonobuoy Systems; Naval Systems; and Sensors and Signature Management and Power.
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. The Intelligence and Communications SBU comprises four OBU: Communications; Specialist Radio Frequency; Command, Control, and Intelligence; and Cyber.
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 SBU operates autonomously and holds responsibility for management of their respective supply chains. Policy and guidance are provided centrally from Head Office, Global ONE Ultra Procurement, and the UK Procurement Council with oversight from the Ultra Chief Risk Officer (CRO).

Ultra is committed to ensuring transparency in our business and in our approach to tackling modern slavery throughout our supply chains. To this end, the topic is discussed during Global ONE Ultra Procurement forums and UK Procurement Council meetings.



ULTRA

Global ONE Ultra Procurement and the UK Procurement Council in partnership with the CRO have determined that, in general, 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 Global ONE Ultra Procurement and the UK Procurement Council 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 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 Board of Directors, this requirement has been delegated to SBU/OBU Managing Directors and 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.

Managing Directors and 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 the CRO and SVP Group Procurement 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.
- + Adding/pre-qualifying suppliers to its vendor base.
- + Conducting audits or visits to supplier sites.
- + 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 programme with Ultra employees and contingent workers attend training covering topics included in the Ultra Code of Conduct during induction and via regular refresher sessions.

Global ONE Ultra Procurement and the UK Procurement Council provide advice, guidance, and training to teams with direct responsibility for supply chains. Our UK Procurement teams in each business are aware of the Home Office Modern Slavery Awareness and Victim Identification Guidance and the matter is a fixed agenda item at regular UK Procurement Council meetings.

During the reporting year Ultra has launched 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 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.

Global ONE Ultra Procurement and the UK Procurement Council provide oversight and challenge to this measuring and review process.

9 Progress since last statement

During the reporting period commencing 1 April 2021 ending 31 March 2022 Ultra addressed the following actions recorded in the previous statement:

- + Launched a global Supplier Code of Conduct setting out minimum standards and expectations for suppliers and the broader supply chain. The code states Ultra's zero-tolerance of inappropriate business conduct, explicitly slavery, human trafficking, and labour exploitation in any form.
- + Extended the independent, anonymous, and confidential reporting platform Speak Up to third parties to enable any person to ask questions and report concerns they believe are a violation of Ultra's Codes of Conduct.
- + Overhauled and re-launched the Modern Slavery and Human Trafficking Policy establishing a central global policy.

10 Goals for the next reporting period

During the next reporting period we plan to:

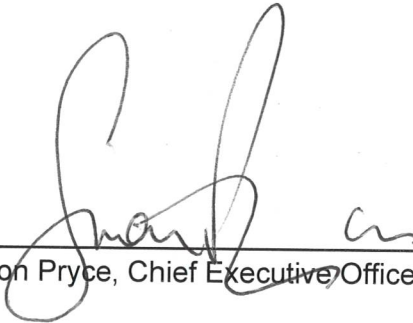
- + Meet our target to sign-up Ultra's top thirty suppliers by spend to the new global Supplier Code of Conduct by the end of 2022.
- + Complete a refresh of business risk assessments to ensure changes in the profile of supply chain risks are considered, assessed, and responsibly managed.



ULTRA.

- + Launch Code of Conduct refresher training to all employees and contingent workers 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 meeting Ultra's commitment to audit a minimum of thirty key suppliers at least every two years.
- + Pledge to collaborate with our suppliers to ensure that like our own employees and contingent workers, theirs are protected and they and their supply chains can compete fairly and have an equal chance of success.
- + 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 Holdings plc approved this statement at the board meeting held 23 June 2022.



Simon Pryce, Chief Executive Officer

25/7/2022
Date

