

Modern Slavery Statement

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1 Ultra policy statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ultra’s modern slavery statement for the period commencing 1 January 2020 and ending 31 March 2021 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 in order 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 ensure modern slavery does not take place anywhere 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 problems in defence, security, critical detection, and control environments.

Ultra is organised into five Strategic Business Units (SBU):

1. The Maritime SBU delivers mission systems and application engineering solutions operational on 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) 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. The Intelligence and Communications SBU 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 Operational Business Units (OBU): Communications; Specialist Radio Frequency; Command, Control and Intelligence; and Cyber.
3. Precision Control Systems (PCS) 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.

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 regularly discussed during Global ONE Ultra Procurement forums and UK Procurement Council meetings.

Global ONE Ultra Procurement and the UK Procurement Council 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 within North America, the UK, Australia, or other low risk territories.



The following steps are taken by Global ONE Ultra Procurement and the UK Procurement Council to prevent modern slavery occurring 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
- + 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 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 Supplier Code of Conduct is issued to all suppliers, contractors, and business partners at the outset of the business relationship and reinforced frequently thereafter (the Ultra Supplier Code of Conduct will be published by the end of 2021).

6 Communication

Ultra 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 Supplier Code of Conduct (published H2 2021)



During the reporting year Ultra has relaunched our independent, anonymous, and confidential reporting platform. Now known as 'Speak Up', this platform is a global channel for any individual who works for Ultra in any capacity to ask questions and report concerns they believe are a violation of the Ultra 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.

Global ONE Ultra Procurement and the UK Procurement Council 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 Home Office Modern Slavery Awareness and Victim Identification Guidance.

During the reporting year Ultra has issued a Code of Conduct, applicable to all individuals who work with Ultra 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 Code of Conduct during induction and via regular refresher sessions.

8 Measuring effectiveness

The effectiveness of Ultra'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'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 Next steps

During the next reporting period commencing 1 April 2021 ending 31 March 2022 we plan to:

- + Launch a 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.
- + Extend the independent, anonymous, and confidential reporting platform Speak Up to suppliers to enable them to ask questions and report concerns they believe are a violation of the Ultra 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 and the supplier/s operate meeting Ultra's commitment to audit a minimum of thirty 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 Electronics Holdings plc approved this statement at the board meeting held 28 September 2021.



Simon Pryce, Chief Executive Officer

28 September 2021

Date

