



Modern Slavery Act Statement 2025 – L3Harris (UK)

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Statement

L3Harris exemplifies Integrity, Respect, and Excellence through accountable, honest, and ethical behaviour. We recognize the challenges of addressing modern slavery in the workplace and are dedicated to upholding the highest standards while delivering advanced and innovative products to our communities.

This statement is made pursuant to Section 54 of the United Kingdom (UK) Modern Slavery Act 2015 and sets out the steps L3Harris and its UK subsidiaries have taken to identify and prevent slavery and human trafficking in our business and supply chain, in the UK, for the year ending 31 December 2024.

Our Structure, Business and Supply Chains

L3Harris is a leading global defence technology company with four well-positioned segments: Space & Airborne Systems, Integrated Mission Systems, Communication Systems and Aerojet Rocketdyne. L3Harris customers include departments and agencies of the United States government, foreign governments, and other global defence contractors.

Headquartered in Melbourne, Florida and publicly traded on the New York Stock Exchange (Symbol: LHX), with a generated revenue of over \$21.3 billion globally for the year ending 31 January 2025, L3Harris strives to be a leader in the market and to drive change around the world. L3Harris is an aerospace and defence company that employs approximately 48,000 employees, with over 5,000 of those, or about ten percent (10%), residing outside of the U.S.

In the UK alone, L3Harris has over 23 entities and a team of over 1,200 employees, with our values of **INTEGRITY, EXCELLENCE** and **RESPECT** integrated throughout the L3Harris business and influencing all of our actions and decisions.

L3Harris is committed to maintaining the trust we have earned with our customers, from source to solution. We achieve this by cultivating mutually rewarding relationships with complimentary supply partners who meet our standards of corporate citizenship. We ensure that our current supply chain partners uphold the highest principles and standards in all economic, human rights and environmental guidelines and practices.

Through our policies, resources, and iterative approach to assessing our strengths and opportunities, L3Harris' initiatives strongly align with the UK Social Value Model regarding Modern Slavery and Human Rights.

- I. **Our Commitment** – L3Harris' [Code of Conduct](#), [Supplier Code of Conduct](#) and various business policies (including our [Human Trafficking Statement](#) and [Human Rights Policy](#)) maintain strict compliance with applicable human rights laws. We hold our suppliers to high standards and make our standards clear in documentation. Additionally, our standard terms and conditions require our suppliers to commit to avoid human trafficking and child and forced labour.

- II. **Our Training** – All L3Harris employees must complete annual training which includes content on our Code of Conduct, how to conduct business on behalf of L3Harris, human rights, and respect in the workplace.
- III. **Our Resources** – L3Harris has extensive resources to support identification, investigation, and responsible management of ethics concerns. As a company, we recognize that employees' mental and physical health is crucial to creating a safe workplace, and thus we offer a wide variety of resources for employees to leverage should they feel the need to do so.
- IV. **Our Assessment** – Being data driven is at the centre of all that we do within the company. To that end, we regularly conduct engagement and ethics surveys to better understand what internal opportunities to improve may exist. In regard to our supply and operations management, we audit and assess our policies and practices to ensure we comply with local laws in the countries where we operate.
- V. **Our Promise** – L3Harris is committed to flawless execution which challenges us to continually improve and push ourselves to higher standards for our customers, communities, and employees.

The below information outlines in more detail how L3Harris UK aligns to the UK Social Value Policy, along with our future plans and initiatives to ensure that we are firmly positioned against Modern Slavery and Human Rights Violations.

Our Governance & Policies

L3Harris is led by a highly experienced board of directors and executive committee dedicated to innovation, transparency, and ethics. We ensure quality through our operational excellence, integrity, and adherence to our Code of Conduct, reflecting our commitment to human rights.

"We are committed to protecting internationally recognized human rights and treating people with dignity, fairness and respect. This means we:

- ✓ *Promote and comply with all human rights laws and standards in all of our locations*
- ✓ *Provide safe and healthy working conditions*
- ✓ *Maintain a workplace that is free from unlawful discrimination and harassment*
- ✓ *Prohibit child labour, forced labour and human trafficking*
- ✓ *Do not engage in misleading or fraudulent recruiting and employment practices*
- ✓ *Recognize the right to freedom of association and collective bargaining*
- ✓ *Comply with all applicable wage and hour laws*
- ✓ *Expect our business partners to share our commitment to supporting human rights as outlined in our Supplier Code of Conduct."*

Our [Code of Conduct](#) clearly outlines that L3Harris is committed to high standards of ethical business practices. We require our suppliers and anyone working on behalf of L3Harris to share this commitment. This is supported by multiple internal policies that draw clear boundaries between right and wrong. All dealings with co-workers, customers, suppliers, and competitors will be conducted with the highest level of ethical integrity and in compliance with all applicable laws and regulations. Part of the employee and supplier evaluation pertains to adherence to the highest levels of honesty and integrity.

Our Respect in the Workplace, Equal Employment Opportunity, Anti-Harassment, and Non-Retaliation Policy affirms L3Harris' commitment to equal employment opportunity and a workplace free of discrimination, harassment and retaliation. It ensures compliance with federal, state, and local non-discrimination, anti-harassment and non-retaliation laws. This policy also clearly defines and makes clear that sexual harassment of any kind will not be tolerated.

Further, our Workplace Threats and Violence policy strictly prohibits:

- Written or oral threats of (or perceived threats of), or commission of, any act of physical violence or harm to the person or property of a co-worker, customer, or any person with whom contact is made during the normal course of business
- Written or oral threats of, or commission of, any act of physical violence or harm to the property or operations of L3Harris, its subsidiaries, customers, contractors or other business-related entities
- Possession or use of firearms or any other weapon in the workplace or at any worksite
- Any single behaviour or series of behaviours which constitute actual or potential assault, battery, harassment or intimidation
- Destruction or attempted destruction of personal or L3Harris property occurring in a L3Harris workplace, at a L3Harris work location, or while an individual is engaged in L3Harris business
- Harassment or aggressive behaviour that creates a fear of violence, such as stalking, sexual harassment, verbal threats and abuse, yelling and using profane language
- Hazing, bullying, or initiation practices

Our [Human Trafficking Statement](#) makes clear that Modern Slavery activities such as debt bondage, forced labour, human trafficking, involuntary servitude, or coercion will not be tolerated under any circumstances and we will take swift action against any employees, suppliers, or business partners that engage in such behaviour. This policy includes instructions on reporting, managing violations, cooperating with government agencies, creating compliance plans, and properly certifying all parties that we work with – all of which directly aligns with the UK Social Value Model.

Our Compliance Plan details policy implementation and assigns responsibility for upholding high ethical standards in human rights practices. As a Tier 3 member of the U.S. Customs-Trade Partnership Against Terrorism (CTPAT) program, L3Harris has also established a multi-layered security program and corporate policy applicable to all operations worldwide to protect against any illegal or illicit activities, including human rights violations and to assist in the worldwide campaign to stop these activities.

L3Harris is committed to doing the right thing. Non-compliance with our policies, laws or regulations will result in disciplinary actions (up to and including employment termination), of employees and business relationships. We regularly review, and update our policies, procedures, and trainings to combat human trafficking and promote supply chain transparency.

Our Due Diligence

As an active member of the Defence Industry Initiative (DII) on Business Ethics and Conduct, L3Harris is committed to upholding the highest standards in our business dealings, and we require our suppliers to share this commitment.

As an integral part of the supply chain onboarding process and prior to contract award, L3Harris representatives conduct supplier eligibility reviews to ensure our supply partners are not in violation of the

L3Harris [Supplier Code of Conduct](#).

This Supplier Code of Conduct expressly states that *“we require our suppliers to share our commitment to uphold the human rights of all workers. This means we expect our suppliers to ensure all employment is freely chosen and prohibit all forms of modern slavery and human trafficking”*.

We also require suppliers under the Supplier Code of Conduct to educate employees on prohibited trafficking activities, discipline employees found to have violated the law or rules and notify the contracting officer of any violations and action taken against employees.

Once we determine that the core values of our supply chain partners align to the L3Harris core values, we conduct a detailed assessment and certification of supplier partner offerings, processes, and capabilities. L3Harris supply chain partners agree to abide by a Supplier Code of Conduct that encompasses best practices related to compliance with laws, human rights, employment practices, anti-corruption, conflict of interest, information protection, environment, health, and safety, global trade compliance, quality, and ethical conduct.

Our General Terms and Conditions and various procurement documents require suppliers to comply with all laws of the countries where they do business, including those prohibiting child labour; indentured, prison or compulsory labour; slavery; and human trafficking. Our suppliers must also ensure *their* lower-tier suppliers follow these laws. We reserve the right to inspect any supplier sites for compliance and maintain hotlines for reporting ethics and compliance issues. We use systems to identify any potential red flags before and during any relationships with supplier partners.

We expect our supplier partners to have management systems in place ensuring compliance with applicable laws, regulations, and our Supplier Code of Conduct. We verify this through contractual agreements and annual certifications, addressing any deficiencies found. Suppliers are also expected to implement their own code of conduct and ensure their suppliers adhere to these principles.

Risk

Given the global scope of our work, modern slavery risks are primarily relevant to our supply chain. We carry out a risk-based approach to our due diligence, based on the location of our suppliers and the nature of goods and services provided using external data to identify higher risk suppliers.

Third party service providers must adhere to our Supplier Code of Conduct, which includes requirements to protect immigration documents, use compliant recruiters, and safeguard potential trafficking victims. We assess goods and services for modern slavery risks based on the U.S. Department of Labor’s 2022 List of Goods Produced by Child Labor or Forced Labor and our procurement system categories. We continuously review and qualify suppliers to mitigate risks, especially in high-risk countries.

Within our organization, our employees and contingent workers also go through a comprehensive pre-employment vetting process to comply with legal and security-based requirements due to the nature of our business. This process includes identity, and nationality checks for the purposes of right to work requirements, employment and academic references, and criminal record checks. UK Security Controllers manage and review staff during their employment to ensure compliance with the appropriate UK regulations. We therefore believe the risk posed by modern slavery to our UK operations is low.

Practices and Effectiveness

As a leader in technological innovation, L3Harris emphasizes data collection to spot trends, take action, and continually improve. We provide resources to help employees maintain high ethical standards. Here is a summary of our efforts with regards to modern slavery and human trafficking:

- As required by **California Transparency in Supply Chains Act S.B. 657**, and the **UK Modern Slavery Act section 54**, for the past 7-8 years we have annually updated a document called [Preventing Human Trafficking – Transparency in Supply Chains](#) which is also posted on L3Harris website. This document is intended to address the reporting requirements for both regulations in a combined way to simplify the reporting by addressing both.
- In 2022, L3Harris created its external [Human Rights Policy](#), which is also posted on the L3Harris website. The creation of which was to address shareholder requests and ESG guidance to have our “policy” external.
- We also have an internal Prevent Human Trafficking Policy and Compliance Plan to provide further guidance to employees on how to prevent, identify and report incidents of suspected Human Trafficking in compliance with all U.S. and international regulations applicable to our business operations

Employees

In April 2023, we conducted an Ethics Survey which had a 61% completion. The information received from this survey has been used to strengthen and improve our culture around ethics, examples of how our systems are working in practice are set out below.

First and foremost, we leverage a very visible Ethics Helpline which is accessible via phone or email and has translations available in a wide variety of languages. We have received feedback from our employees that the Helpline is very easy to navigate as a resource where they can report (anonymously if desired) an ethics concern or violation.

Additionally, we have an updated list of Ethics Advisors who employees can contact directly with questions or concerns if they feel the need to. These advisors are seasoned employees throughout the company that help navigate ethics investigations, questions, and concerns.

Employees are also informed that they have other resources beyond the Ethics Helpline and Ethics Advisors. Depending on the situation, employees may feel more comfortable raising the concern with a supervisor or other member of management, Human Resources, a member of the legal department, a subject matter expert, or reaching out via mail. At L3Harris we strive to ensure that reporting is accessible for all, no matter the avenue.

Employees also can leverage our Employee Assistance Program (EAP) resources. In our UK business, employees may speak to a qualified counsellor through our Aviva EAP. This outsourced resource offers free and/or discounted support for employees on a wide variety of topics, including child and elder care, financial and legal assistance, emotional health and family support.

Supply Chain

Following the due diligence exercise, we also work to ensure that the steps we have taken to prevent slavery and human trafficking from taking place in our supply chain remain effective for the long term.

Internally, L3Harris deploys supply chain centre of excellence teams who focus on supply chain performance and compliance. These teams: (i) perform ongoing compliance reviews, (ii) participate in

improvement initiatives, and (iii) collaborate with the legal, internal audit, quality, human resources, ethics, program management, finance, and accounting departments to ensure supply chain performance and culture are aligned to L3Harris objectives values. Under the L3Harris Supplier Code of Conduct, anyone who becomes aware of or suspects a violation of this Supplier Code of Conduct is instructed to report such matter to the L3Harris Helpline.

We require suppliers to certify their prohibition of human trafficking before renewal/award and annually thereafter. Suppliers must provide their employees with safe channels to raise legal or ethical concerns without fear of retaliation and take action against any retaliation. Annually, we publish a Sustainability Report detailing our Environmental, Social and Governance programs that outlines our values, principles, standards, mechanisms for raising ethics concerns, and further business ethics information. This published report also provides information on employee and supplier accountability.

We are committed to verification and oversight of our supply chain, promotion of internal awareness and accountability, and to the investigation and remediation of potential non-compliance.

L3Harris partners with Interos, a resilience platform, to provide insight into our suppliers which helps to identify sub-tier suppliers and their connections to our business. The Interos platform contains risk profiles across six key risk factors at all tiers of our extended supply chain, including Environmental, Social, and Governance (ESG) practices and provides detailed metrics on a company's policies and performance regarding human rights, including information on child or forced labour, treatment of people throughout the supply chain, and treatment of the local populace. Our legal team will investigate any credible information received. L3Harris and its legal team will coordinate and comply with government agency investigations as outlined in our Code of Conduct.

Training and Capacity Building

All new employees must complete training on the Code of Conduct, environmental health and safety, anti-corruption, and anti-harassment and discrimination. L3Harris conducts annual compliance trainings on these topics, requiring employees to review and certify their understanding of the Code of Conduct each year. This training covers human trafficking, human rights, and workplace conduct, including respect. Trainings are available in multiple languages to ensure accessibility and understanding across the organization.

During 2024 in the UK 1,500 employees completed our Code of Conduct training for a total of approximately 650 hours – 75 of which specifically related to human rights and human trafficking.

We empower employees to use their best judgment by training them on our three-step ethical decision-making model – ACT. “A” stands for Asking what the issues are. “C” stands for Consideration of our values and responsibilities. Finally, “T” stands for Taking Action in a timely manner. These three steps help employees determine the appropriate steps to consider and escalate matters regarding violations or concerns.

Our Ethics organization hosts an annual Ethics Week which covers a myriad of topics to train and guide employees on how to leverage our reporting tools and then how L3Harris proceeds with the reported concern. These listening sessions and information are made public to our employees through our intranet. We have increased transparency to demonstrate our commitment to a workplace based on values and anonymously demystify internal ethics proceedings.

Our internal Ethics organization also works hard to increase transparency of the ethics process and what employees can expect. We have an Ethics in Action series which anonymizes past ethics cases and outlines the corporate investigation, final action, and corporate expectations which informed the final decision-making process.

June 4, 2025

Approval by subsidiaries

The L3Harris Modern Slavery Act Statement 2025 has been approved by the board of directors of the following subsidiaries:

Harris Pension Management Limited
L3Harris Autonomous Surface Vehicles Limited
L3Harris Communications Systems UK Limited
L3Harris Defence Investments Limited
L3Harris MAPPS Limited
L3Harris Release & Integrated Solutions Ltd
L3Harris Technologies (New Finco) Limited
L3Harris Technologies ASA Limited
L3Harris Technologies UK Limited
L3Harris Technologies UK Topco Limited
L3Harris TRL Technology Limited

They all delegated authority to Graeme Mackay to sign this statement on their behalf.

This statement has been signed by:

Graeme Mackay

VP, UK Operations

L3Harris Technologies UK Limited

Signed June 4, 2025 following Board approvals passed on June 4, 2025. The financial year end for all L3Harris UK subsidiaries is 31 December (save for Harris Pension Management Limited, whose financial year ends 30 June).