



Modern slavery act statement 2022

Organization Name: **L3Harris UK**

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Summary

Embodying our Corporate Values of Integrity, Respect, and Excellence, L3Harris is second to none when it comes to our accountable, honest, and ethical behavior. We understand the dynamic challenges the world faces when identifying and managing the risks of modern slavery in the workplace. At L3Harris we always do what is right and are committed to upholding the highest standard in our efforts to deliver technologically advanced and innovative products to our communities. Through our policies, resources, and iterative approach to assessing our strengths and opportunities, we find evidence that L3Harris UK initiatives align with the UK Social Value Model regarding Modern Slavery and Human Rights.

- I. **Our Commitment** – L3Harris’ Code of Conduct and various business policies maintain strict compliance with applicable human rights laws. We hold our suppliers to high standards and make our standards clear in documentation.
- II. **Our Training** – All L3Harris employees receive 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 thus why we offer a wide variety of resources for employees to leverage should they feel obliged.
- IV. **Our Assessment** – Being data driven is at the center of all that we do within the company. To that end, as a recently merged company, we have conducted engagement and ethics surveys to better understand what internal opportunities may exist. In regard to our supply and operations management, we audit and assess our policies and practices to ensure we are compliant with laws in the countries we operate within.
- 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, our future plans and initiatives to ensure we are on the right side of the battle against Modern Slavery and Human Rights Violations.

OUR COMMITMENT

L3Harris is led by a highly experienced board of directors and executive committee deeply committed to innovative, transparent, and ethical business operations. We drive quality through our commitment to operational excellence, integrity in all we do, and adherence to our Code of Conduct.

“L3Harris is committed to protecting human rights and preventing human trafficking by promoting and complying with all human rights laws and standards in all our locations.” Our Corporate Code of Conduct clearly outlines that L3Harris is committed to high standards of ethical business practices. This is supported by multiple internal policies that draw clear boundaries between right and wrong. All dealings with co-worker, customers, suppliers, and competitors will be conducted with the highest level of ethical integrity and in compliance with all applicable laws and regulation. Part of employee and supplier evaluation pertains to adherence to the highest levels of honesty and integrity.

L3Harris works hard to maintain the trust we’ve earned with our customers – from source to solution. We do so through cultivating mutually rewarding relationships with complimentary supply partners who: innovate to create value, continuously strive to reduce total costs, consistently deliver excellent service, meet, or exceed our quality and responsiveness requirements, and meet our standards of corporate citizenship. Our current supply chain partners uphold the highest principles and standards in all economic, human rights and environmental guidelines and practices. L3Harris is an active member of the Defense Industry Initiative whose mission is the continued promotion and advancement of a culture of ethical conduct in every company that provides products and services through government contracting.

In line with upholding guidelines and appropriate practices, our internal Code of Conduct aligns with our Supplier Code of Conduct. Supply Partners are fundamental to our success and collectively represent over 50 percent of our costs each year. Therefore, L3Harris maintains focus on finding and cultivating the best supply partners in the world. We expect that all our suppliers maintain full compliance with all laws and regulations applicable to their business both domestically and when conducting international business. We expect our suppliers to provide employees with avenues for raising legal or ethical issues without fear of retaliation. Our suppliers must abide by human rights laws and they must educate employees on prohibited activities as well as take responsibility to any violations that may occur.

Our Equal Employment Opportunity Policy protects employees against retaliation and harassment while also establishing that sexual harassment advances as a condition of employment or condition of employment decisions is strictly prohibited. L3Harris has also stated that “threats or acts of violence, intimidation, and harassment or stalking on L3Harris property or in connection with business or business situations is strictly prohibited.” Under our policies, we are clear that these unacceptable behaviors will not be tolerated in any form and will not be allowed to be used as a tool to force an employee.

Our Human Trafficking Policy makes clear that Modern Slavery activities such as debt bondage, forced labor, human trafficking, involuntary servitude, or coercion are under no circumstances acceptable and we will not knowingly work with employees, suppliers, or business partners that engage in such behavior. As such, we follow strict guidance to hold ourselves, employees, suppliers, and partners accountable. 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 lines up with the UK Social Value Model.

OUR TRAINING

Internally, all new hires must complete Code of Conduct, environmental health and safety, anti-corruption, sexual harassment, international workplace respect, and bias in the workplace training. L3Harris conducts quarterly compliance trainings on these topics and each year employees must review the Code of Conduct and certify that they have read and understood its contents. Our Code of Conduct training specifically addresses violations regarding to human trafficking and human rights in the workplace. It also includes content on how we expect our employees to conduct business on behalf of L3Harris and includes respect in the workplace. These trainings are offered in a variety of languages to ensure that the information is accessible to and understood by our entire organization.

During 2021 in the UK 1,360 employees completed our Code of Conduct training for a total of approximately 570 hours – 115 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.

We require that suppliers obtain certifications affirming their prohibition of human trafficking on pre-subcontract renewal/award and annually thereafter.

OUR RESOURCES

L3Harris has many resources employees can leverage to ensure we are maintaining high ethical standards. First and foremost, we leverage a very visible Ethics Helpline. With a phone number, email, and translations available in a wide variety of languages, it is very easy to navigate to a resource where you can identify yourself or anonymously report an ethics concern or violation. From there, we have published information on our intranet pertaining to the steps that are taken once a report is filed.

Additionally, we have an updated list of ethics advisors that employees can directly reach out to 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. In 2020, our ethics advisors were invited to a two-day conference to train and equip the team to support our community. Employees are 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 even reaching out via mail.

Our internal Ethics organization 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. Employees can read through these cases to better understand the areas they should be aware of and what actions may result in reaching out to open an investigation.

Employees may also leverage our EAP resource which stands for Employee Assistance Program. In our UK business, employees may speak to a qualified counsellor through our Aviva Employee Assistance Program. This outsourced resource offers free and/or discounted support for employees on a wide variety of topics that an employee may want to seek additional support for.

Every year we publish a Sustainability Report that outline our values, principles, standards, mechanisms for raising ethics concerns, and further business ethics information. Within this published report, there is information on employee and supplier accountability. We require our supplier partners to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

OUR ASSESSMENT

L3Harris is a leader in technological innovation and with that comes a strong emphasis on collecting and understanding data with the intention to continually push ourselves to the next level. Since our merger, we have collected Engagement Surveys to understand our areas of improvement and we are working to consistently align our actions with employee and community expectations.

At the end of 2020, we also conducted an Ethics Survey which had a 61% completion rate with nearly 5,000 employee comments. This information will be used to strength and improve our culture around ethics.

Our Compliance Plan outlines the implementation of our policy aimed at preventing and identifying human trafficking within L3Harris and its supply chain. This includes which functional entities within L3Harris are responsible for assessing and ensuring that we are following high ethical standards around our human rights practices.

Internally L3Harris deploys supply chain center of excellence teams whose focus is on supply chain performance and compliance. These teams: perform ongoing compliance reviews, participate in improvement initiatives, 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.

As 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. Once it is determined that the core values of our supply chain partners are aligned to the L3Harris core values, we perform a detailed assessment and certification of supplier partner offerings, processes, and capabilities. As part of this process, 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.

We reserve the right to require that our suppliers demonstrate compliance, and we can inspect any supplier site as we feel the need to. We also maintain ethics and compliance reporting hotlines and resources and related investigation protocols. Additionally, L3Harris performs risk based due diligence on all Third Parties and has established strong internal controls consistent with our Code of Conduct and applicable laws and

regulations. We also employ a system to identify any potential red flags before and during any relationships with supplier partners.

Commensurate with the size and nature of their business, we expect our supplier partners to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within the supplier code of conduct, contractual agreements, or as part of the annual representation and certification process. This should include measures to address supplier partner compliance and take appropriate action to correct identified deficiencies. We encourage our suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services

As a Tier 3 member of US Customs Trade Partnership Against Terrorism program, L3Harris has established a multi-layered security program and corporate policy applicable to all operations worldwide to protect our organization and supply chain from any illegal or illicit activities to include human rights violations and assist in the worldwide campaign to stop these activities.

OUR PROMISE

L3Harris commits to doing the right thing. This means that the processes we have in place may result in a need for action. If there is a failure to comply with our policies, L3Harris retains the right to terminate employment, or relationships with employees and/or suppliers. We will continue to periodically review, and modify/enhance policies, procedures, trainings and other tools and efforts designed to combat human trafficking and promote supply chain transparency. 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 noncompliance. L3Harris is currently in the process of partnering with an analytics supplier partner to automate and to further enhance our supply chain monitoring process. Future state will include increased supply chain visibility, and monthly monitoring of key compliance and performance risk areas. Any credible information received will be investigated through Legal and L3Harris will coordinate and comply with government agency investigations as outlined in our Code of Conduct as needed.