



# L3HARRIS™

## Modern Slavery Act Statement 2024 – L3Harris (UK)

Published: December, 2024

### Statement

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 strive to 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.

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 2023.

### 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 \$19 billion globally for the year ending 31 December 2023, 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 52,000 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 1,500 employees, with our values of **INTEGRITY**, **EXCELLENCE** and **RESPECT** integrated throughout the L3Harris business and influencing all of our actions and decisions.

L3Harris also works hard to maintain the trust we have earned with our customers – from source to solution. We do so through 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 labor.

- 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 center 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 Policies**

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 which expressly states that:

*“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-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 Equal Employment Opportunity Policy protects employees against retaliation and harassment while also establishing that sexual harassment advances as a condition of employment or consideration in 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.

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 aligns with the UK Social Value Model.

Our Compliance Plan specifically outlines the implementation of such policies and sets out which functional entities within L3Harris are responsible for assessing and ensuring that we are following high ethical standards around our human rights practices. As a Tier 3 member of the U.S. Customs Trade Partnership Against Terrorism program, L3Harris has also 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, including human rights violations and to assist in the worldwide campaign to stop these activities.

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 or enhance policies, procedures, trainings and other tools and efforts designed to combat human trafficking and promote supply chain transparency.

### **Our Due Diligence**

As an active member of the Defense 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.

Therefore, 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](#).

Explicitly stated within this Supplier Code of Conduct, is the fact 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 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.

Our General Terms and Conditions and various procurement documents contractually obligate our suppliers to comply with all laws of the countries where they do business, including those prohibiting child

labor; indentured, prison or compulsory labor; slavery; and human trafficking. Our suppliers must also impose this same contractual obligation on *their* lower-tier suppliers. We reserve the right to require that our suppliers demonstrate compliance with the Supplier Code of Conduct and their contractual obligations, and our terms and conditions allow us to inspect any supplier site if needed. We also maintain ethics and compliance reporting hotlines for suppliers 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 and check that our supplier partners have management systems in place to support compliance with applicable laws, regulations, and the expectations related to or addressed expressly within the Supplier Code of Conduct and, contractual agreements, or as part of the annual representation and certification process. We ensure these measures address supplier partner compliance and take appropriate action to correct identified deficiencies. We also expect 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.

## **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.

Where services are provided by third party companies, they are also subject to our Supplier Code of Conduct. This includes obligations on suppliers to ensure that immigration documents are not destroyed or concealed, that they use recruiters who comply with local labour laws, and that they investigate and protect employees suspected of being trafficking victims. Our assessment of goods and services, that may be higher risk for the purpose of modern slavery, is based on the U.S. Department of Labor's 2022 List of Goods Produced by Child Labor or Forced Labor and the general supplier categories in our procurement system. We maintain ongoing review and qualification processes for prospective and current suppliers to mitigate risk levels across all countries, including those noted as high risk.

Within our organisation, 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**

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. L3Harris therefore has many resources that employees can leverage to ensure that we 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, is intended to address the reporting requirements for both regulations in a combined way to simplify the reporting by addressing both.

- In 2022 the external [Human Rights Policy](#) was created, which was also posted on the L3Harris website. The creation of which was to address some ESG guidance to have our “policy” external.
- There is also the [LGL-03 Preventing Human Trafficking](#) policy and [LGL-03.1 Preventing Human Trafficking – Compliance Plan](#) to provide the basis for the basic things we should be doing as a company to adhere to various regulations and guidance.

## **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 that suppliers provide certifications affirming their prohibition of human trafficking on pre-subcontract renewal/award and annually thereafter. We also 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. Every year we also publish a Sustainability Report covering 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 currently 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 labor, treatment of people throughout the supply chain, and treatment of the local populace. Our legal team will investigate any credible information received. Legal and L3Harris will coordinate and comply with government agency investigations as outlined in our Code of Conduct.

### **Training and Capacity Building**

Internally, all new employees 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 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.

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.

\_\_\_\_\_ **2024**

**Approval by subsidiaries**

The L3Harris Modern Slavery Act Statement 2024 has been approved by the board of directors of the following subsidiaries:

Airline Placement Limited
FAST Holdings Limited
FAST Training Services Limited
Harris Pension Management Limited
L3Harris Autonomous Surface Vehicles Limited
L3Harris Commercial Training Solutions Limited
L3Harris Communications Systems UK Limited
L3Harris CTS Airline and Academy Training Limited
L3Harris CTS Group Limited
L3Harris CTS Limited
L3Harris Defence Investments Limited
L3Harris Flight Data Services Limited
L3Harris MAPPS Limited
L3Harris Release & Integrated Solutions Ltd
L3Harris Technologies (New Finco) Limited
L3Harris Technologies ASA Limited
L3Harris Technologies CTS Holdings 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.



**Graeme Mackay**  
VP, UK Operations  
L3Harris Technologies UK Limited

Signed on \_\_23 Dec\_\_\_\_\_ 2024 following Board approvals passed on 18 December 2024. The financial year end for all L3Harris UK subsidiaries is 31 December (save for Harris Pension Management Limited, whose financial year ends 30 June).