

Ultra Intelligence & Communications  
2025 - 2026 Modern Slavery Policy Statement

The Board of Directors of Ultra Intelligence and Communications (Ultra I&C) approved this statement on July 1, 2025.

## Our Policy Statement

This statement is issued pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Ultra I&C's Modern Slavery Statement for the period commencing July 1, 2025 and ending June 30, 2026 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, labor 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 I&C has a zero-tolerance approach to modern slavery in any form.

Ultra I&C 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 of our supply chain.

## Our Structure

Ultra Intelligence & Communications provides critical, tactical capabilities that inform decision making in the most challenging environments. Our team of experts possess decades of expertise in mission-critical, multi-domain communications, command and control, and cyber security.

We are headquartered in the United States and also have physical offices in Canada and the United Kingdom. Ultra I&C was formerly part of Ultra Communications; this is Ultra I&C's first modern slavery statement.

## Our Supply Chain

Each of Ultra I&C's business units operate autonomously and hold responsibility for management of their respective supply chains. Policy and guidance are provided centrally from Ultra I&C. Ultra I&C is committed to ensuring transparency in our business and in our approach to tackling modern slavery throughout our supply chains.

Ultra I&C has a low dependency on goods and services from suppliers that present a high modern slavery risk. The goods and services procured by Ultra I&C business units 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 Ultra I&C support prevention of modern slavery in our supply chains:

- Determine and maintain acceptable procedures for supplier pre-qualification
- Conduct ongoing risk assessment of modern slavery based on country and sector
- Maintain a central Modern Slavery policy statement
- Provide mechanisms for discussing and recording occurrences of modern slavery that are identified; determine actions to prevent future incidences
- Develop and introduce training in identifying modern slavery across the supply chain for relevant employees

## Our Actions

Although oversight of Ultra I&C's Modern Slavery Policy Statement lies with Ultra I&C's Board of Directors, this requirement has been delegated to business unit Presidents who are responsible for the implementation and of the Policy Statement within their respective business units and for ensuring risk assessment of suppliers is effectively managed.

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

- The Ultra I&C Supplier Code of Conduct is issued to all suppliers, contractors, and business partners at the outset of the business relationship and reinforced frequently thereafter
- Risks are escalated to Ultra I&C in a timely manner.

## Our Communications

Ultra I&C expects all suppliers to conduct business in an ethical, safe, and sustainable way and to comply with all applicable laws and regulations. Ultra I&C communicates standards and expectations to suppliers in the following ways:

- Ultra I&C 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 when deemed necessary
- Engaging with suppliers when conducting business activity

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## Our Training

Business unit Presidents hold responsibility for providing adequate and regular employee training to ensure employees understand of the risks of modern slavery in their business unit and supply chain. This is supported by Ultra I&C's comprehensive global compliance training program. Our Procurement teams in each business unit are aware of Ultra I&C's Modern Slavery Policy Statement.

Ultra I&C has a global Supplier Code of Conduct. Suppliers commit to providing regular training to their employees including all minimum standards and requirements mandated by Ultra I&C. Our Code of Conduct reinforces that businesses are responsible for ensuring that suppliers and other partners operate with integrity and to high ethical standards.

## Measuring Our Progress

The effectiveness of Ultra I&C's Modern Slavery Policy Statement will be measured by:

- Business unit compliance with the Modern Slavery Policy Statement
- 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 and training adopted by businesses units
- Recording and monitoring modern slavery incidents (if any) within Ultra I&C's supply chains and, where necessary, developing corrective measures



Karen Bomba  
Chair, Board of Directors