



## **Forced Labour in Canadian Supply Chains**

**Kratos Antenna Solutions Canada Corporation**

**2024**

**Table of Contents**

Identification ..... 3  
    Legal Structure ..... 3  
    Mission Statement ..... 3  
    Products or services offered ..... 3  
    Target Market ..... 3  
    Business Activities ..... 3  
Due Diligence Process ..... 4  
    General ethical and legal conduct ..... 4  
    Potential Threats Avoidance ..... 4  
Appendix A: Supplier Code of Conduct ..... 5  
    Intent ..... 5  
    Ethical Standards ..... 5  
    Worker Treatment ..... 5  
Appendix B: Employment Age Restriction Policy ..... 6  
    Intent ..... 6  
    Policy Statement ..... 6  
    Implementation ..... 6  
    Conclusion ..... 6  
Employee Training ..... 7  
    Monitoring and Reporting Effectiveness ..... 7  
    Conclusion ..... 7  
Contact Information ..... 7  
Attestation ..... 7

## **Identification**

### **Legal Structure**

Kratos Antenna Solutions Canada Corporation is an Antenna manufacturing company located in Whitby, Ontario Canada and registered in the Province of Nova Scotia.

### **Mission Statement**

Kratos Antenna Solutions mission is to become the global leader in the SATCOM, RADAR, and specialty antenna marketplace. We will achieve this position by expanding and diversifying our product portfolio through profitable growth and acquisition of related technologies to serve customers in commercial, civil and defense related markets around the globe. We will establish our market position by providing high quality, high performance products at competitive prices, while ensuring value to our customers, employees, shareholders, suppliers, and communities in which we operate.

### **Products or services offered**

Fixed earth station antennas ranging from 2.5-meter to 18-meter in diameter, radar antennas for air traffic control and weather applications, and lines of High-Frequency (HF) and specialty antennas.

### **Target Market**

Kratos antennas deliver a broad range of capabilities for Satellite communication operators.

### **Business Activities**

Kratos Antenna Solutions manufactures antenna systems within Canada. Our antenna systems are sold both in and outside of Canada. KAS does import goods that are produced outside of Canada.

Kratos has policies and resources for the following:

- Codes of conduct for employees, contractors, and vendors
- State-of-the-art, interactive compliance training
- Periodic signed disclosures and certifications of key personnel
- Monitoring of fraud hotline, with investigation and resolution of inquiries
- Annual audit, reporting, and updates

## **Due Diligence Process**

### **General ethical and legal conduct**

Kratos Antenna Solutions Canada Corporation (KAS) is committed to conducting our business with integrity throughout our operations. Employees, vendors, and independent contractors performing work for Kratos are expected to conduct Kratos' business honestly and ethically, comply with laws, rules, and regulations, and represent Kratos responsibly within the communities where we operate. Kratos is committed to ensuring the protection of the rights of all those who work for us and will do so through ensuring sound and ethical employment and business practices.

Our Code of Legal and Ethical Conduct, as well as our Corporate Ethics and Compliance Policy aims to promote a culture of legal and ethical compliance throughout Kratos Antenna Solutions Canada Corporation. It highlights several specific policies and laws that must be complied with when conducting business with or for Kratos. Most importantly, Kratos encourages the reporting of suspected illegal or unethical conduct.

#### **Potential Threats Avoidance**

Purchasing practices are such that Kratos deals with vendors in low-risk areas such as the G20 countries or countries with similar legislative environments. When deciding to work with a vendor we primarily work with OEMs or the authorized distributor of the OEM. Kratos Antenna Solutions does not work with any vendors that may be operating with sanctioned countries. We also reserve the right to terminate/ block a vendor if we believe they are not operating in our best interest or according to our company values. Appendix A – Supplier Code of Conduct

Kratos follows the strict laws prohibiting trafficking in persons, procurement of commercial sex acts, and use of forced labour in connection with all contacts. Such activities are illegal, incompatible with basic human rights and directly contrary to Kratos' Code and Values. We require 100% compliance with these laws.

Our Health & Safety program and policy maintains a culture of ongoing health & safety of our staff, clients, visitors and public at large, to ensure that our workplace meets or exceeds all applicable requirements under the health & safety legislation. We are committed to the protection of the environment and ensure that the activities of our organization are conducted in an environmentally friendly manner and within government regulations.

Our Recruiting practice and policy is not to employ any persons under the age of 18 years old unless it is an accredited college or university student co-op. Please review Appendix B - Employment Age Restriction Policy.

## **Appendix A: Supplier Code of Conduct**

### **Intent**

Kratos Antenna Solutions Canada Corporation (KAS) cares about the social and environmental impact of not just our own operations, but the operations of our suppliers. We strive to form relationships with suppliers who have a positive effect on their environment and their community, and care about the ethics and quality of their products and business.

### **Ethical Standards**

Kratos Antenna Solutions Canada Corporation has the following ethical expectations from suppliers:

- Suppliers will follow all applicable ethical laws and standards required within the country of operation. This could include but is not limited to health and safety laws and ethical conduct laws.
- Suppliers must provide the minimum number of benefits required within the country of operation.
- Suppliers must provide a physically safe workplace for their employees and minimize risk of accidents whenever possible.
- Suppliers will follow any applicable laws in their country of operation concerning health and safety precautions.
- Suppliers will prioritize the health and safety of their employee's over possible financial gain.
- Suppliers must be intolerant to any form of corruption, money-laundering, or bribery (Examples include excessive gift-giving, conflicts of interest, etc.)

### **Worker Treatment**

Kratos Antenna Solutions Canada Corporation has the following worker treatment expectations from suppliers:

- Suppliers will follow all applicable worker treatment laws and standards required within the country of operation.
- Suppliers will treat all their employees with respect and dignity. No employee will be subjected to any form of harassment, discrimination, or abuse.
- Suppliers will not employ any child labour. Child labour, for the purposes of this policy, is defined as the minimum age of full-time employment within the country of operation.
- Suppliers will only employ workers who are under their own free will. This means we will not tolerate any form of involuntary labour, such as bonded labour, prison labour, or indentured labour.
- Suppliers will pay their employees at least the minimum wage within the country of operation. Suppliers who pay more than minimum wage to their workers will be preferred when forming new supplier relationships.
- Suppliers will not force their employees to work overtime without overtime pay.
- Suppliers will listen to and consider social concerns raised by their stakeholders (their employees, their shareholders, their community, etc.).

## **Appendix B: Employment Age Restriction Policy**

### **Intent**

Kratos Antenna Solutions Canada Corporation is committed to upholding legal standards and promoting a safe and inclusive work environment for all employees. In alignment with labor laws and our dedication to responsibility, this policy outlines our stance on not hiring individuals under the age of 18.

### **Policy Statement**

Kratos Antenna Solutions Canada Corporation strictly prohibits the hiring of individuals under the age of 18 for any position within the organization. This policy applies to all departments, roles, and locations under our jurisdiction.

**Legal Compliance:** This policy aligns with local, provincial, and federal labor laws and regulations regarding the minimum age for employment. By adhering to these laws, KAS ensures compliance and mitigates the risk of legal repercussions.

**Safety Considerations:** Many roles within our organization may involve tasks or responsibilities that pose potential risks to individuals under the age of 18. By restricting employment to adults, we prioritize the safety and well-being of all employees.

### **Implementation**

**Human Resources:** The Human Resources department is responsible for ensuring compliance with this policy throughout the hiring process. Recruitment efforts, job postings, and candidate screening procedures will reflect the age restriction outlined in this policy.

**Training:** Managers and hiring personnel will receive training and guidance on the legal and operational aspects of this policy to ensure consistent implementation and understanding.

**Communication:** This policy is part of our hiring practice and is part of our job postings. It is communicated to employees through the following avenues: orientation sessions, employee policy folder, HR information boards and any other relevant channels to promote awareness and understanding.

### **Conclusion**

By adopting this policy, Kratos Antenna Solutions Canada Corporation reaffirms its commitment to legal compliance, safety, and fostering a professional workplace environment. We believe that this approach reflects our values and contributes to the overall success and well-being of our organization and its employees.

## **Employee Training**

Kratos Antenna Solutions Canada Corporation provides training and awareness through our Code of Legal and Ethical Conduct Policy and our posted communication on Child and Human Trafficking.

Training is mandatory for all employees. It is reviewed in orientation with all new employees and is signed off on. The training is mandatory and reviewed a second time for employees making contracting or purchasing decisions. All policies are reviewed annually and if any changes are made, all employees receive new training.

## **Monitoring and Reporting Effectiveness**

Kratos Antenna Solutions reviews and assess our performance in programs, activities, and policies on an annual basis. We strive to address any issues in a timely, appropriate manner and will ensure the results of our reviews are communicated effectively.

Kratos Antenna Solutions encourages employee, customer and vendor feedback regarding our operations, products, and services, and will work to act on feedback as appropriate.

## **Conclusion**

Kratos Antenna Solutions is committed to provide due diligence within our business practices to support ongoing efforts to establish supply chains free from forced labour, human trafficking, and child labour.

## **Contact Information**

Kratos Antenna Solutions is committed to our customers, employees, shareholders, and communities. If you require additional information regarding our policies or business, please contact us at [ASC.HumanResources@kratosdefense.com](mailto:ASC.HumanResources@kratosdefense.com).

## **Attestation**

I do hereby attest that this information is true, accurate and complete to the best of my knowledge and I understand that any falsification, omission, or concealment of material fact may subject me to administrative, civil, or criminal liability.

Anthony Russell, President \_\_\_\_\_

Date \_\_\_\_\_