

Forced Labour in Canadian Supply Chains [Bill S-211]

Introduction

Ultra Electronics Maritime Systems, Inc. is the world's premier provider of undersea warfare systems, products and solutions, delivering advanced technologies that create maritime warfighting advantages for 'five-eyes' and allied defense customers across surface, sub-surface and unmanned platforms. Ultra are the undersea warfare experts that you can rely on from quality, to delivery, to capability.

This report outlines Ultra's policies and procedures regarding human trafficking and slavery legislation. It details our proactive measures in managing our supply chain to identify and mitigate the risks of human trafficking, child labor, and forced labor.

1. Policy

Ultra is firmly committed to preventing forced labor and child labor within our operations and supply chain. We have established comprehensive policies aimed at identifying and preventing the risk of such practices. Our policies are continually being developed and enhanced to ensure they are effective and aligned with best practices and legislative requirements.

Key actions include:

- Implementing stringent policies against forced and child labor.
- Regularly reviewing and updating these policies to ensure they remain robust and effective.

2. Supplier Code of Conduct

To ensure our commitment extends throughout our supply chain, we have established a Supplier Code of Conduct. This code explicitly prohibits slavery, human trafficking, and labor exploitation. It mandates that all suppliers adhere to the following principles:

- Compliance with the UK Modern Slavery Act 2015.

- Acceptance of Terms and Conditions that include clauses on preventing forced labor and child labor.

Suppliers must agree to these terms as a condition of their engagement with our company. This requirement helps to reinforce our commitment to ethical labor practices across all tiers of our supply chain.

3. Risk Management

We have initiated a risk management process to identify potential risks of forced labor within our supply chain. We are conducting risk assessments to identify areas where forced labor and child labor may be present.

To date, our assessments have not revealed any instances of forced labor or child labor within our operations or supply chain. Consequently, no mitigation actions have been necessary. However, we remain vigilant and continue to monitor and assess risks on an ongoing basis.

4. Training & Monitoring

To ensure our employees are well-equipped to recognize and prevent forced labor and child labor, we are developing comprehensive training programs. These programs will cover:

- The identification of signs of forced labor and child labor.
- The steps to take if such practices are suspected.

Additionally, we are implementing monitoring mechanisms to evaluate the effectiveness of our policies and procedures.

Conclusion

Ultra is dedicated to upholding the highest standards of human rights and labor practices. Through our stringent policies, Supplier Code of Conduct, risk management processes, and employee training programs, we are committed to ensuring that forced labor and child labor have no place in our operations or supply chain. We will continue to enhance our efforts in this area, ensuring that our practices remain effective and aligned with evolving legislative requirements and best practices.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

John Gallagher
Vice President / General Manager Ultra Maritime Canada
May 23, 2024

I have the authority to bind Ultra Electronics Maritime Systems, Inc.


