

Statement on Preventing Forced Labor

Leonardo DRS, Inc. (“DRS”) is committed to respecting human rights throughout our operations and working with our business partners to support their own compliance programs to protect vulnerable workers.

DRS expressly prohibits the use of forced labor, slavery or human trafficking in any form.

DRS recognizes that forced labor, modern slavery, and human trafficking can occur through unethical business practices including charging of employment fees, holding of identity documents, and threats of reprisal or abuse. We further understand that these conditions may be forced upon individuals who lack access to remedies or support resources.

In addition, we recognize the heightened risks inherent in certain mineral mining operations and comply with Section 1502 of the Dodd-Frank Act. You can find more information on our efforts in our Form SD filed annually with the SEC.

Our Corporate Structure

DRS was founded in 1969 and is listed on the Nasdaq stock exchange (ticker: DRS). The company is headquartered in Arlington, VA and employs approximately 7,000 workers worldwide. As a U.S. defense contractor with access to classified information, DRS and our proxy holder directors have entered into a proxy agreement with our immediate majority stockholder, Leonardo US Holding, LLC, our indirect majority stockholder, Leonardo S.p.A., Leonardo International S.p.A, and the Department of Defense, to mitigate against the potential for undue foreign ownership control and influence.

Our Business

DRS is a leading provider of defense products and technologies that provide battlefield superiority today while shaping the battlefield of tomorrow. We offer a broad portfolio of technologies, products and services in our core markets including advanced sensing, network computing, force protection, and electrical power conversion and propulsion. The U.S. Department of Defense is our largest customer accounting for approximately 80% of our business as an end-user.

Our operations are structured into two segments: Advanced Sensing and Computing, and Integrated Mission Systems.

Our Ethical Code

Our core standards are set forth in the Leonardo DRS Code of Business Ethics and Conduct (the “DRS Code”). The Codes and supporting policies serve as an expression of the Company’s philosophy and intent. We expect our suppliers, vendors, contractors and partners to develop and comply with ethics and compliance programs consistent with our core standards.

At DRS, our mission transcends mere compliance with regulatory requirements; it is rooted in a steadfast commitment to ethical conduct in our dealings.

The DRS Code sets the foundation for how we expect our employees to navigate through complex ethical situations. It establishes our expectations for appropriate business conduct in a variety of scenarios and is applicable to all employees, regardless of position, location or level of responsibility. Annually, all employees must reaffirm their commitment to complying with our DRS Ethics Program by providing a written certification of their adherence to the DRS Code and its principles. Furthermore, we provide annual Ethics and Compliance training which educates employees about situations they may face. Employees have a



duty to disclose potentially wrongful conduct, including violations of law or regulation. DRS prohibits retaliatory conduct against any employee who, in good faith, has reported or provided information of potential wrongdoing.

Certain of our contracts with the U.S. Government contain Federal Acquisition Regulation clause 52.222-50 - Combating Trafficking in Persons (48 C.F.R. § 52.222-50). In support of the principles embodied in our Code and in compliance with this clause, we have adopted a policy on Combating Trafficking in Persons. The policy helps to inform all employees about the U.S. government's zero tolerance policy for trafficking in persons. The policy explicitly prohibits employees from participating in the following activities:

- Engaging in severe forms of trafficking in persons
- Procuring commercial sex acts
- Using forced labor
- Denying access to employee identity documents
- Using misleading recruiting/hiring practices
- Charging employee recruitment fees
- Failing to provide return transportation upon end of employment (where applicable)
- Providing inadequate housing
- Failing to provide an adequate, written employment contract where required by law or contract

Our Supply Chain

DRS's manufacturing processes include, among other things, the assembly of purchased components and subsystems from various vendors and suppliers.

Our Supplier Code of Conduct, based on our own DRS Code, sets forth our expectation that our suppliers act ethically and lawfully in operating their businesses.

We require suppliers to provide annual representations & certifications, including an acknowledgement of their obligations under our Supplier Code of Conduct. We further 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.

DRS evaluates its supplier relationships on an ongoing basis, including considering the extent to which a supplier has failed to reasonably comply with our Supplier Code of Conduct. If we determine that a supplier's efforts are deficient, we will take appropriate action, up to and including termination of our relationship with the supplier.

Risk of Forced Labor

Due to the nature of our business, geographic location of our suppliers, and the highly regulated nature of our industry, DRS believes its risk of exposure to modern slavery is relatively low.

DRS relies primarily on a U.S. domestic supply chain but does have some international supply partners for unique goods and services. In 2024, we had over 2,500 Tier 1 suppliers, including approximately 200 suppliers located outside of the United States.

DRS has designed its due diligence framework to align with the framework provided by the Organization for Economic Cooperation and Development. DRS consults the resources made available through the U.S. Department of State's Trafficking in Persons Report and Walk Free's Global Slavery Index to identify geographic locations with higher risk for labor rights violations and factors supplier location in its risk-based review. In those cases where an elevated risk is identified, our mitigation approach begins with supplier



engagement, and, when appropriate, an investigation. If a labor risk or violation is identified, we work with the supplier to gain assurances that the matter has been adequately addressed and/or may terminate the relationship. In the case of a potential violation of law or regulation, we may be required or otherwise opt to report such matters to the proper authorities.

Ethics Alertline

The DRS Ethics Alertline is a confidential resource, managed by an independent third party, that reporting parties can use to let us know about situations where they believe DRS may not have lived up to its stated standards for ethical conduct, or where an issue or concern previously reported is not being properly addressed. Reporting parties can elect to submit their report anonymously.

The Ethics Alertline is available 24 hours a day, seven days a week.

When a reporting party contacts the Ethics Alertline, a trained staff member will take detailed notes and send a confidential report to DRS. These calls are not recorded. This helps assure callers of confidentiality and, when requested, anonymity. We strictly prohibit retaliation against anyone who raises an ethics or compliance issue in good faith.

Ethics Alertline: +1 800 694 5005 ethicsoffice@drs.com

Continuous Improvement

DRS is committed to continuous improvement in all of our business activities, including in matters of compliance. Among other things, we plan to offer additional training to relevant DRS employees and expand our due diligence efforts.

Applicability

This policy statement is intended to be consistent with the disclosure requirements of any applicable regulatory regime, including the following Acts:

- California Transparency in Supply Chains Act
- Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act
- UK Modern Slavery Act
- Australia Modern Slavery Act

LEONARDO DRS, INC.

By: 

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