

RAYTHEON SYSTEMS LIMITED

MODERN SLAVERY STATEMENT

This statement is pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2021.

Raytheon Systems Limited (RSL) is committed to ensuring slavery and human trafficking are not taking place in our business or supply chains. This statement sets out the actions taken by Raytheon Systems Limited during the financial year ending 31 December 2021 to ensure slavery and human trafficking is not taking place in any part of our operations or supply chain.

Our Corporate Structure

Raytheon Systems Limited (“RSL”) is a part of Raytheon Technologies Corporation.

Raytheon Technologies is a corporation incorporated under the laws of the State of Delaware, USA and listed on the New York Stock Exchange (Ticker Symbol: RTX). Raytheon Technologies is an aerospace and defense company that provides advanced systems and services for commercial, military, and government customers worldwide. The company was formed in 2020 through the combination of Raytheon Company and the United Technologies Corporation aerospace businesses. Raytheon Technologies is headquartered in Waltham, Massachusetts, U.S.A. and a global manufacturer with a highly skilled workforce comprised of approximately 174,000 employees. Raytheon Technologies consists of four highly specialised businesses: Collins Aerospace Systems, Pratt & Whitney, Raytheon Intelligence & Space, and Raytheon Missiles & Defense; with each segment comprised of groups of similar operations.

- Collins Aerospace specialises in aerostructures, avionics, interiors, and mechanical, mission, and power and control systems and digital solutions that serve customers across the commercial, regional, business aviation and military sectors.
- Pratt & Whitney designs, manufactures and services the world’s most advanced aircraft engines and auxiliary power systems for commercial, military and business aircraft.
- Raytheon Intelligence & Space (RIS) develops advanced sensors, cyber services and software solutions – delivering the disruptive technologies customers need to succeed in any domain, against any challenge.
- Raytheon Missiles & Defence (RMD) provides the industry’s most advanced end-to-end solutions to detect, track and engage threats.

RSL is organised under RIS.

Our Operations

Raytheon Systems Limited (RSL) is a prime contractor and major supplier to the United Kingdom (UK) Ministry of Defence, other large defence sector prime contractors including UK and overseas government entities. We have developed strong capabilities in mission systems integration in defence, national security and commercial markets. RSL also designs, develops and manufactures a range of high-technology electronic systems and software at facilities across multiple sites throughout the UK.

Our Supply Chain

RSL seeks to develop strategic relationships with reputable, responsible suppliers that are committed to the highest standards of ethics and business conduct. We rely on a global supply chain to deliver goods and services, in a timely and satisfactory manner, and in full compliance with applicable terms and conditions.

Our global supply chain spans many industries. Our suppliers can be divided into two broad categories:

- Product suppliers (a/k/a “direct” suppliers) – i.e., those that support the delivery of services and products to our customers; and
- Non-product suppliers (a/k/a “indirect” suppliers) – i.e., those that support our operations.

The products we procure for the delivery of our programs are predominantly high-end technology or commercial off-the-shelf products. We procure from large multinational companies and from small and medium-sized businesses.

Many of our tier-one suppliers are from regions considered to be low risk for modern slavery and human trafficking (e.g., North America (U.S. and Canada), the United Kingdom, and mainland Europe).

Our Exposure to Modern Slavery

We consider our exposure to modern slavery to be low due to the nature of our business, the marketplaces that we and our suppliers operate in, and our company’s policies and procedures for combatting modern slavery (these are described in more detail in the below section titled, “Managing Modern Slavery Risks”).

Risk in Our Operations

We do not have a significant risk of modern slavery within our operations or workforce. We condemn and prohibit human trafficking as well as forced and child labor. Our internal policies and procedures are designed to provide a positive, safe work environment, ensure compliance with applicable law, and respect and protect human rights. As an aerospace and defense company, we operate in a highly regulated industry, predominantly employ a highly skilled workforce, and do not operate in any sector or industry that has a prevalence to modern slavery risks.

Risk in Our Supply Chain

Because of the nature of the goods and services we predominantly source, where our suppliers are predominantly located, the risk-based due diligence we conduct to ensure potential strategic suppliers are qualified and reputable before onboarding, and our standard terms and conditions of purchase requiring suppliers to comply with applicable laws, we do not have a significant risk of modern slavery within our supply chain. However, we recognise that forced labour and related practices have the potential to intersect with our supply chain, and as described below in more detail, we have established policies and procedures to mitigate that risk.

Managing Modern Slavery Risks

RSL is committed to responsible and ethical business practices and expects our employees, as well as our customers, suppliers, and other partners to uphold principles respecting and protecting human rights.

Raytheon Technologies Human Rights Council and Policy

In 2021, Raytheon Technologies established a Human Rights Council consisting of high-level company officials from each of the company's four businesses and its relevant corporate functions. The HRC continuously assess and works to improve Raytheon Technologies processes, policies and tools that address human rights risks.

In 2022, the Committee on Governance and Public Policy of the Board of Directors for Raytheon Technologies approved an enterprise-wide policy on human rights. [A copy is available under the "Human Rights" section of Raytheon Technologies' website \(www.rtx.com\)](#). Respecting and protecting human rights is fundamental to how our people and businesses operate globally.

Raytheon Technologies Code of Conduct

Stronger Together, Raytheon Technologies' global Code of Conduct (the "Code") is the foundation of our culture. By setting standards and by guiding us in line with our values, the Code helps us to build a strong ethical culture and to achieve our business goals with integrity. It applies to all our directors, officers, and employees, and in certain respects, to business partners such as suppliers, consultants, representatives, and agents. Among other things, the Code includes the following statements regarding selecting and collaborating with the right partners and the protection of human rights:

We choose our business partners based on merit and shared values and treat them fairly. We seek business partners who can help us achieve our goals by working collaboratively to provide expertise, resources, efficiency, and innovation. This helps us deliver excellent, reliable products on time and on budget. We expect partners to share our high ethical and safety standards and our passion for making a positive impact in the world. Selecting and collaborating with the right partners means that we:

- *Seek to do business with partners who meet our needs and share our values;*
- *Conduct risk-based due diligence to ensure potential partners are qualified and reputable before on-boarding;*
- *Monitor business partner performance on an ongoing basis;*
- *Expect our partners to uphold our values and comply with anti-bribery conventions and all other applicable laws; and*
- *Formalise relationships in writing to provide transparency and accountability.*

Respecting and protecting human rights mean that we:

- *Ensure safe and healthy working conditions for our employees, by applying best practices in our day-to-day activities and facilities and ensuring compliance with the most stringent applicable EHS standard;*
- *Promote responsible sourcing practices and hold business partners accountable to the standards we set in our Supplier Terms and Conditions and Code of Conduct;*
- *Work only with business partners who share our commitment to fighting human trafficking and supporting human rights;*
- *Condemn and prohibit the use of child or forced labor; and*
- *Follow company policies, regulations, and guidance regarding potential conflict minerals.*

The Code is available [here](#).

Internal Accountability Standards – Reporting Encouraged, without Fear of Retaliation

RSL is committed to a culture where people are encouraged and confident to speak up, without fear of retaliation. This is an enterprise-wide value.

Raytheon Technologies promotes behaviors based on trust, respect, accountability, collaboration, and innovation. When employees, contractors and partners observe or suspect something that conflicts with our values, the *Code*, company policies or laws and regulations, we encourage them to speak up and report it. The Raytheon Technologies Speak Up Helpline is an anonymous reporting channel for all stakeholders to report any type of issue or concern. Additional information regarding the various resources available to ask a question or raise concerns is available [here](#).

Raytheon Technologies has zero tolerance for retaliation of activities that impact good-faith reporting, and anyone engaging in retaliatory behavior is subject to disciplinary action.

Internal Training

Raytheon Technologies recognises that our people play an important role in building and maintaining a strong ethical culture where we achieve our business goals with integrity, in accordance with our *Code*, and applicable laws. All employees receive annual ethics and compliance training. We also make training available to all employees on recognising and mitigating the risk of human trafficking and modern slavery in supply chains.

Supply Chain Expectations and Assessment Processes

RSL suppliers are critical to our success and our ability to provide superior products and services in a responsible manner. As a vital part of our team, we have the same expectations of our suppliers for ethics and compliance as we have for our officers, directors, employees, and representatives.

- **Compliance with all Applicable Laws:** Our standard terms and conditions of purchase require suppliers to comply with all applicable laws and regulations.
- **Raytheon Supplier Conduct:** Through RSL’s standard terms and conditions of purchase, suppliers must represent that they have not participated in any conduct in connection with the contract that violates our company’s Code of Conduct or, alternatively, equivalent business ethics and conduct standards of the supplier; failure to do so can result in contract termination.
- Raytheon Technologies **Supplier Code of Conduct (*Supplier Code*)** establishes the principles and expectations we expect from our suppliers in regard to business conduct, ethics and compliance. Among other things, the *Supplier Code* requires suppliers:
 - To ensure child labor is not used in the performance of their work, whether or not related to Raytheon Technologies business.
 - To comply with laws and regulations prohibiting human trafficking. This includes prohibiting the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery, or trafficking in persons.
 - To develop and implement policies and procedures to ensure that employees may perform their work in an environment free from physical, psychological or verbal harassment or intimidation, or any other form of abusive conduct.

- To pay all workers at least the minimum wage required by the applicable laws and regulations and, at a minimum, provide all legally-mandated benefits, as well as to compensate all hourly workers for overtime at the rate required by applicable laws and regulations.
- To flow down the principles set forth in the *Supplier Code* to their business partners providing products or services that will be incorporated in products or services furnished to Raytheon Technologies.
- To allow Raytheon Technologies and/or its representatives to assess the supplier's compliance with the expectations set forth in the *Supplier Code* in performing work for Raytheon Technologies, including on-site inspection of facilities.

The *Supplier Code* is available in many languages and is published [here](#).

- **Raytheon Technologies' standard terms and conditions of purchase** also require a supplier to adopt and comply with a code of conduct or policy statement regarding business conduct, ethics and compliance that satisfies, at a minimum, the principles and expectations set forth in the *Supplier Code*; a supplier's failure to do so can result in contract termination
- **Supplier Assessment and Verification (including Audits):** Suppliers are subject to robust selection processes and criteria, including for example, verification against government denied party lists. Periodically, in the normal course of business, we may conduct a site visit with a supplier. However, in the ordinary course of business, we do not conduct site visits or otherwise evaluate or audit suppliers specifically for the purpose of verifying the eradication of slavery and human trafficking in their supply chains. Anyone who suspects or observes such conduct may ask a question or raise concerns, including in complete confidence, through the resources described above in the section titled, "Internal Accountability Standards – Reporting Encouraged, Without Fear of Retaliation."
- **Supplier Certification:** In the normal course of business, we do not require suppliers to expressly certify that materials incorporated into goods furnished to us comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

[Sub-tier suppliers that directly support U.S. Government prime contracts must include Federal Acquisition Regulation ("FAR") clause 52.222-50, Combating Trafficking in Persons, where applicable. This clause contains a reporting obligation to notify the Contracting Officer and the agency Inspector General immediately of any credible information we receive from any source that alleges an employee or subcontractor has engaged in conduct that violates the policy. Suppliers must submit certifications where required by the FAR.]

Effectiveness of Actions Taken

Questions or concerns raised through the above-described reporting mechanisms would be directed to Global Ethics & Compliance for a thorough investigation. No such reports or concerns were made during the Reporting Period, and we have not otherwise identified any instances of modern slavery or human trafficking in our business or in our supply chain. This is consistent with our assessment that overall, our exposure to human trafficking and modern slavery is low.

Continuous Improvement Efforts to Mitigate Risk

Since December 31, 2021, RSL has taken, or intends to take the following steps to continue to ensure modern slavery is not taking place in its organisation or supply chain. As part of our regular business operations, we intend to:

- Raise internal and external awareness regarding our corporate policy condemning and prohibiting the use of child and forced labor;
- Seek to do business with reputable, responsible suppliers that are committed to the highest standards of ethics and business conduct;
- Require our suppliers, through our standard terms and conditions of purchase, to represent that they will (1) comply with all applicable laws and regulations (including those that prohibit forced labor and modern slavery) and (2) comply with a code of conduct or policy statement regarding business conduct, ethics and compliance that satisfies, at a minimum, the principles set forth in the Raytheon Technologies Supplier Code of Conduct;
- Provide employees with training resources designed to increase awareness of ethics and compliance matters generally, as well as on recognising and mitigating the risks of human trafficking and modern slavery in supply chains;
- Through our Ethics Office, thoroughly investigate any concerns or allegations of misconduct submitted to the Raytheon Technologies or Ethics Office and, if substantiated, resolve through appropriate corrective action; and
- Monitor the development of new regulations relating to prevention of modern slavery and human trafficking, to ensure that our policies and procedures remain current and compliant.

Statement Approval

This statement has been approved by the RSL Board of Directors on 31 May 2022.

Signed by:



John Reilly
General Counsel and Company Secretary
31 May 2022