

L3Harris Integrated Mission Systems Australia Pty Ltd (Reporting Period January to December 2022)

# **POLICIES**

#### L3Harris Policy Statement

L3Harris does not engage in human trafficking and will not willingly or knowingly assist in any human trafficking committed by any other party, nor will knowingly work with suppliers or business partners that engage in such activities.

L3Harris maintains internal policies and compliance plans designed to foster compliance with applicable human trafficking- related laws. Its commitment to compliance with these laws is also reflected in its Code of Conduct and Supplier Code of Conduct

- L3Harris Code of Conduct
- L3Harris Supplier Code of Conduct

### **LEGISLATION**

Modern Slavery Act 2018 (Cth)

#### **Reporting Entity and Reporting Period**

This Modern Slavery Statement 2022 is submitted under the *Modern Slavery Act 2018 (Cth)* by L3Harris Integrated Mission Systems Pty Ltd (ABN: 28 009 019 603) for the financial year 1 January 2022 to 31 December 2022.

# About L3Harris Integrated Mission Systems Australia Pty Ltd (IMSA), its structure and operations

L3Harris has a number of operating entities in Australia, owned by L3Harris Technologies, Inc (USA), including IMSA. Headquartered in Melbourne, Florida (USA) L3Harris Technologies, Inc is a global aerospace and defence company that employs approximately 50,000 employees worldwide.

IMSA employs approximately 150 personnel across Australia, based in Fremantle, Adelaide, Melbourne, Sydney, Brisbane and Cairns. IMSA provides military and commercial products, capability and associated support services, including but not limited to; project management, engineering, design, integration, manufacture, research and development and training. Major customers include federal agencies such as the Australian Department of Defence and commercial companies operating in Australia that provide goods and services to the Department of Defence.

L3Harris IMSA have achieved ISO 9001:2015 certification.

#### **Operational Risk**

All L3Harris Technologies, Inc owned entities, including IMSA, adhere to a global corporate policy statement against human trafficking (which is contained in the Supplier Code of Conduct) and further follow an internal corporate procedure "LGL\_03-Preventing Human Trafficking". IMSA actively implements L3Harris corporate policies and procedures and conducts all business dealings in accordance with the L3Harris corporate values of Integrity, Respect and Excellence.

All IMSA personnel are required to be familiar with these policies and procedures on anti-human trafficking. All IMSA personnel attend regular mandatory training (with compliance checks on attendance) and workshop sessions which includes Modern Slavery, Code of Conduct, ethics and values and company whistle blower processes.



#### Operational Risk (cont)

IMSA primarily employs Australian citizens, some of whom are Australian Defence Force veterans, and have been vetted accordingly.

Due to the nature of the work conducted, extensive due diligence processes for employees and direct contractors and the rigorous security requirements of its customers, IMSA considers there is negligible risk pertaining to Modern Slavery within its own operations, however IMSA remains vigilant in its approach to reducing the risk of Modern Slavery.

IMSA's Standard Terms and Conditions of Sale includes a statement that no form of slavery is used in IMSA's business and a warranty of compliance with Modern Slavery statutory requirements. Where it is practical and agreeable with the customer, IMSA will seek to utilise these terms in providing goods or services to its customers.

#### **Supply Chain Risk**

IMSA's supply chain consists of around 390 Approved Suppliers which have been qualified through the supplier evaluation process. During 2022, IMSA transacted with 378 such Approved Suppliers, of which 99.4% are located in the low risk countries of Australia, the United States of America, Canada, United Kingdom, New Zealand and Germany. Furthermore, much of the USA, Canada and United Kingdom spend is with other L3Harris subsidiary companies.

As tier 1 supplier spend is almost wholly with either other L3Harris entities or long standing suppliers located in low risk countries for the purchase of low risk commodities, IMSA's overall tier 1 supply chain risk continues to be assessed as low.

# Actions taken to assess and address the risks, including due diligence and remediation processes

IMSA undertakes a variety of actions to address risk at the individual supplier level, including:

- Using only qualified Approved suppliers which have been vetted through a supplier evaluation and registration process
  - The supplier evaluation and registration process requires suppliers to commit to upholding our Supplier Code of Conduct, which contains express provision on Modern Slavery compliance and specific expectations that suppliers must have whistleblower protection for staff



Actions taken to assess and address the risks, including due diligence and remediation processes (cont.)

- Screening all suppliers through a 'Denied and Restricted Party Screening Solution' - Descartes Visual Compliance
- Utilising Purchase Order terms that incorporate Modern Slavery provisions where practicable
- Incorporation of Modern Slavery clauses into more complex contractual arrangements
- Purchase from companies based and headquartered in low risk countries
- For higher risk laptops/computers and electronics commodities, purchase from member companies of the Responsible Business Alliance to full extent practicable
- Comply with conflict minerals compliance requirements set out in Section 1502 of the *Dodd Frank Act* (US), as a subsidiary of ultimate parent company, L3Harris Technologies, Inc.

#### Assessment of effectiveness of actions

IMSA undertook a comprehensive review of its supplier list in 2021 and during 2022 requalified and verified supplies through the supplier evaluation process. This resulted in a consolidation of the supplier base with approximately 390 Approved Suppliers qualified to supply.

IMSA will continue to periodically review its supplier base, utilise only Approved Suppliers and, as appropriate, re-evaluate suppliers.

IMSA also has the ability to inspect Approved Supplier site/s as part of the Supplier evaluation, and procurement and quality assurance processes. Suppliers who do not maintain the highest of standards are reassessed and (where applicable) removed periodically. Periodic quality audits/inspections are scheduled.

IMSA reserves the right to terminate supplier relationships for violation of the Supplier Code of Conduct.

#### Consultation

IMSA does not own or control any other entities and therefore this section is not applicable.



## Approval by the principal governing body

For L3Harris Integrated Mission Systems Australia Pty Ltd this Modern Slavery Statement 2022 is approved by its principal governing body, being the Board of Directors, by Director's Resolution dated 19 February 2024.

Signed by the Board's nominated responsible delegate:

**Dean Powell** 

Commercial Director and Company Secretary L3Harris Integrated Mission Systems Australia Pty Ltd