

## **Chelton Modern Slavery & Human Trafficking Statement FY2023**

This statement constitutes Chelton Limited’s slavery and human trafficking statement, pursuant to Section 54 of the United Kingdom’s Modern Slavery Act 2015. This statement details actions and activities undertaken by Chelton to understand potential modern slavery risks related to its business and the steps taken to ensure that there is no slavery or human trafficking within Chelton Limited or its supply chains during financial year 1<sup>st</sup> October 2022 to 31<sup>st</sup> September 2023.

### **1. Organisational Structure & Supply Chains**

This statement covers the activities of Chelton Limited (“Chelton”) who supply innovative control and communication technology and services on which aircrafts depend across the defence and aerospace markets. Chelton recognises that it has a responsibility to take a robust approach to slavery and human trafficking within its corporate activities, whilst ensuring that its supply chains are free from slavery and human trafficking when operating within these markets.

Chelton has an operational presence within the United Kingdom and Finland. Chelton designs, manufactures and supports tuneable, low profile and conformal air borne antennas, anti-jam GPS systems, ground penetrating radars, air traffic management systems and mast systems, amongst other equipment.

### **2. Relevant Policies**

Chelton maintains the following policies that detail its approach to the identification of modern slavery risks and steps it takes to prevent slavery and human trafficking within its operations:

- **Anti-Slavery & Human Trafficking Policy** Chelton has initiated an internal policy to implement a system of control to manage modern slavery and human trafficking risks in its operations, services and supply chains. The policy applies to all employees working for the business or on its behalf in any capacity including its supply chain. The policy covers expectations in terms of training requirements and communication routes for reporting of modern slavery concerns and suspicions.
- **Whistleblowing Policy** Chelton encourages its employees and customers to report any concerns related to the direct activities of Chelton or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Chelton has adopted its parent companies Whistleblower policy, which can be found on TransDigm’s website (<https://www.transdigm.com/investor-relations/corporate-governance/>). Additionally, our anonymous reporting through the internet at [www.convercent.com](http://www.convercent.com); or free 24-hour number 1-800-461-9330 can be utilised to make disclosures, without fear of retaliation.

- **Codes of Business Conduct** Chelton has adopted its parent company's 'Codes of Business Conduct' which can be found on TransDigm's website (<https://www.transdigm.com/investor-relations/corporate-governance/>), making clear to employees the actions and behaviours expected of them when representing the business.
- **Supplier Quality Assurance Manual** Chelton is committed to ensuring that its suppliers adhere to the highest standards of ethics as detailed within its Supplier Assurance Quality Manual. Suppliers are required to conduct their business and operations in a way that respects human rights by treating their employees with dignity and promoting fair employment practices. This includes providing fair and competitive wages, prohibiting harassment, bullying and discrimination, prohibiting use of child, forced, bonded or indentured labour or prison labour and not engaging in trafficking of persons for any purpose. Suppliers are encouraged to identify risks and adverse human rights impacts related to their activities, with serious violations leading to the termination of the business relationship.
- **Recruitment/Agency Workers Policy** Chelton uses reputable employment agencies from its preferred supplier list, working with them to ensure their policies manage the risks of slavery and human trafficking in relation to agency workers.

### 3. Due Diligence

A prioritised, risk-based due diligence approach has been applied to both internal operations and global supply chains. This approach assesses recruitment practices, geographic risk and industrial sector risk against relevant legislation. Furthermore Chelton:

- undertakes appropriate due diligence when considering new suppliers,
- conducts reviews and risks assessment of its supply chain with regards to possible exposures and areas of improvement,
- updates internal policies to counter modern slavery and human trafficking; and
- conducts supplier audits or assessments either directly or through a third party, with a focus on slavery and human trafficking where such risks have been identified.

### 4. Training

All Chelton employees and contractors complete an annual online training module on modern slavery. More detailed training on anti-slavery and human trafficking policy requirements are also offered to functions directly responsible for policy implementation and contract specific requirements. A training record for employees is maintained by the business.

Suppliers are able to access educational resources on human trafficking, provided as a free service through our third party provided supplier compliance management tool.

## 5. Evaluation & Performance Indicators

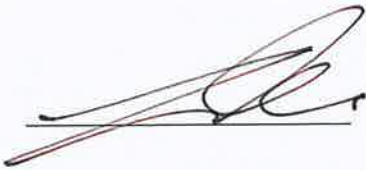
- Chelton continue to engage with a third party subject matter expert to approach our Supply Chain with a regular series of questionnaire ‘campaigns’ that covers Modern Slavery and Human Trafficking. Monthly reports on results and progress are provided.
- At end of May, 103 of Cheltons live suppliers have responded to these ‘campaigns’ with ‘0’ suppliers confirmed as having a ‘high risk’.
- In addition to the above, 90% of our suppliers are UK based and are required to comply to the UK Legislation, Modern Slavery act 2015.

## 6. Approval of this Modern Slavery & Human Trafficking Statement

Chelton’s Senior Leadership Team recognises the importance of the provisions of the Modern Slavery Act 2015 and alongside the President are committed to ensuring that slavery and human trafficking has no part within its operations, services or supply chain.

Chelton Limited has a zero tolerance approach to modern slavery and human trafficking.

This statement was approved on 1<sup>st</sup> May 2024



**Signed by James Burke – President, Chelton Limited**