QIOPTIQ LIMITED: SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT.

MODERN SLAVERY ACT 2015

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to conducting all our business dealings and relationships responsibly and to implementing and enforcing effective systems and controls to reduce the risk of modern slavery taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 ('the Act'). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

ORGANISATIONS STRUCTURE

We design and manufacture photonic products and solutions that serve a wide range of markets and applications in the defence and aerospace sector. We are a part of the Excelitas Group (Group), and our ultimate parent company is Excelitas Technologies Corp. It has its head office in Massachusetts, USA.

Qioptiq Limited had a global annual turnover of £97 million for financial year ending 2nd January 2022.

OUR BUSINESS

Our business is organised into two business units: Land and Optical Systems supported by other business functions.

OUR PEOPLE

Due to the nature of the industry we work in and the customers we support, all potential permanent and contract employees go through a pre-employment vetting process. Individuals are verified for identity, employment and academic history, nationality and right to work status and security/criminal record checks.

Where we work with third party recruitment service providers, they are appointed and managed to include our expectations with regards to human rights, modern slavery, and human trafficking.

Our standard terms and third-party recruitment terms require compliance with all legislation in the jurisdiction in which they operate and through our Supplier Principles, suppliers are encouraged to meet the same or similarly high standards equivalent to our own on ethical conduct, labour welfare, health and safety, environment, civil liberties, and human rights.

Our people processes, outlined within people policies, ensures that where required by law or contract, each employee receives a contract or recruitment agreement outlining matters which may include remuneration, job role, rest and holiday periods, training and development and notice periods.

OUR SUPPLY CHAIN

Our supply chain includes the sourcing of materials relating to the provision of photonic products. This can be by forming a directly contracted supply base or 'off the shelf 'catalogue items. Our procurement policy sets out requirements for supplier engagement, including the management of supplier-related risk and ways of working. Compliance with this policy is monitored through our Quality management System and audited in accordance with AS9100. Supplier-related risk is managed in the same way as other business risk.

Our Standard Conditions of Purchase includes a clause regarding compliance with laws. Supplier compliance with our Standard Conditions of Purchase is reviewed and considered during the supplier due diligence, selection and approval process and during ongoing supplier management and quality assurance.

To ensure all those in our supply chain and contractors comply with our values we flow down the requirements of the Act to all Sub-contractors and have in place a supply chain compliance programme. We expect all those in our supply chain and contractors comply with our values.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We:

- Ensure our values, which are embedded throughout our business, set the parameters for how we expect our people to behave with colleagues, clients and the world at large.
- seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted.

- Ensure our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

Excelitas global policies and processes support our commitment to human rights. Our Standards of Business Ethics sets out clear expectations on ethical conduct to help our people understand the right thing to do.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we:

- Undertake a robust pre-employment vetting process.
- Identify, assess and monitor potential risk areas in our supply chain.
- Prior to approving and selecting suppliers, we undertake due diligence.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains and expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour.
- Have in processes in place systems to encourage the reporting of concerns and the protection of protecting whistle blowers. During 2022, no concerns or calls were raised to our officers or helpline regarding modern slavery or human trafficking.

RESPONSIBILITY FOR THE POLICY

The Board of Directors has overall responsibility for ensuring compliance with our legal and ethical obligations, and that all those under our control comply with those obligations.

Our Operations Director and Supply Chain Director are responsible for day-to-day implementation of this Policy, monitoring its use and effectiveness and dealing with any queries about it relating to our supply chain.

Our HR team has day-to-day responsibility for dealing with any queries about the Policy as it relates to our people.

Our senior business unit leaders have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it as it relates to their respective business lines.

The Company's managers are responsible for discussing our policy with all employees in our organisation and for ensuring that its provisions are understood and observed. Each manager is responsible for practicing diligent supervision to ensure the ethical and legal business behaviour of those employees for whom the manager has operational responsibility. Each employee also has

direct personal responsibility for following the provisions of this Policy and for taking the initiative to seek help or clarification to avoid unethical or illegal business decisions.

Our policy is embedded in our business processes and procedures. Compliance with our policy is monitored through our Quality Management System and audited in accordance with AS9100.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide training to Directors, Site Leadership Team and Management Team. We also require our business partners to provide training to their staff, suppliers and providers.

This Policy Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human trafficking statement for year ending 31 December 2022 and was approved by our Board of Directors on 13th April 2023.

Signed

Peter White, SVP Optical Systems & Managing Director