

UNITED KINGDOM MODERN SLAVERY ACT STATEMENT

This is a statement made pursuant to section 54(1) of the Modern Slavery Act 2015. The statement sets out the steps the Collins Aerospace group, through all of its operating companies in the United Kingdom (as listed below), has taken during the financial year ending 30 December 2019 to ensure slavery and human trafficking is not taking place in any part of its own business, or supply chain. Collins Aerospace is a supplier of technologically advanced aerospace and defense products. We design, manufacture and service systems and components and provide integrated solutions for commercial, regional, business and military aircraft, helicopters, airports and other platforms. Collins Aerospace is part of United Technologies Corporation which provides high technology products and services to the building systems and aerospace industries worldwide through its four business segments: Otis, Carrier, Pratt & Whitney, and Collins Aerospace (collectively, "UTC").

Collins Aerospace is committed to ensuring slavery and human trafficking are not taking place in our business or supply chains and, to this end, took or continued to take the following actions during the Reporting Period.

UTC Code of Conduct

United by Values, UTC's global Code of Conduct (the "Code"), is the foundation of our culture. It applies to all our directors, officers, and employees, as well as representatives of UTC and our subsidiaries and affiliates throughout the world. Among other things, the Code includes the following statements:

UTC respects and protects human rights by:

- *Ensuring safe and healthy working conditions for its employees based on whatever is most stringent: U.S. standards, local standards, or UTC policies*
- *Never using child labor or forced labor, and always seeking out business partners who share our commitment to fighting human trafficking and supporting human rights*
- *Promoting responsible sourcing practices and setting expectations for our key suppliers through the UTC Supplier Code of Conduct, including that suppliers must ensure safe and healthy work environments for their employees, avoid discrimination, ensure that child labor is not used, and avoid human trafficking.*

How we Uphold the Code:

Using teams of internal and external experts, UTC audits its operating entities on a regular basis to ensure compliance with the Code and Company policy. From time to time, UTC may also audit its business partners. Audits, whether announced or unannounced, will culminate in a report that is shared with appropriate stakeholders to facilitate continuous improvement.

When an actual or potential violation of law, the Code, or Company policy is reported or detected, UTC's Ethics & Compliance Office will conduct a timely and thorough investigation in compliance with the law. Every effort will be made to get all sides of the story, while also maintaining confidentiality to the greatest extent possible, as well as attorney-client privilege when the investigation is being done at the direction of legal counsel.

UTC commits to treating all parties involved in an audit or investigation with respect. To protect confidentiality or address other concerns, there may be times when the details of issues being investigated are not shared with all parties. All employees and business partners must be truthful and fully cooperate with audits and investigations, except where applicable laws limit mandatory cooperation. Cooperation may include participating in interviews and providing documents.

If a violation has occurred or the subject of an audit or investigation has been untruthful or otherwise uncooperative, appropriate disciplinary measures will be taken. Such measures may include counseling, warnings, suspension, termination, reimbursement of losses, or even referral for criminal prosecution. UTC's Ethics & Compliance Office and Human Resources will participate in the disciplinary proceedings to ensure due process and consistent treatment for all employees.

Each year, UTC requires its employees to certify they have read and will comply with the Code. Employees are expected to report any violations of the Code of which they are aware and that have not otherwise been reported to management, the Global Ethics & Compliance organization, or via the Ombudsman program.

UTC Ombudsman Program

Employees and third parties (including suppliers) who observe or suspect a violation of the Code may ask a question or raise concerns in complete confidence through UTC's Ombudsman Program. Additional information about the UTC Ombudsman Program is available [here](#).

Internal Training

UTC made and continues to make training available to company management and employees on recognising and mitigating the risk of human trafficking and slavery in supply chains. Employees with direct responsibility for supply chain management are assigned this training during their second year in that job function.

Supply Chain Expectations and Assessment Processes

Our suppliers are critical to our success and, in order to provide superior products and services in a responsible manner, we require our suppliers to meet our expectations for ethics and compliance.

Contract Terms: UTC's standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations. In addition, our contract terms require suppliers 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 set forth in the *Supplier Code of Conduct* ("Supplier Code"). In addition, suppliers are required to have management systems, tools and processes in place that (a) ensure compliance with applicable laws, regulations, and requirements set forth in the *Supplier Code*; (b) promote an awareness of and commitment to ethical business practices; (c) facilitate the timely discovery, investigation, disclosure and implementation of corrective actions for violations; and (d) provide training to employees on compliance requirements, including the expectations set forth in the *Supplier Code*. In the event a supplier commits any material violation of law relating to basic working conditions and human

rights in their performance of work of their subcontracts with UTC, UTC has the right to terminate those subcontracts for default.

UTC's standard contract terms and conditions of purchase also include Federal Acquisition Regulation ("FAR") clause 52.222-50, Combating Trafficking in Persons, in its subcontracts, including commercial item subcontracts which are placed with direct suppliers in support of UTC's U.S. Government contracts. This clause must be flowed down to sub-tier suppliers that support U.S. Government prime contracts and 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. UTC requires suppliers to submit certifications where required by the FAR.

Supplier Code of Conduct: Among other things, the *Supplier Code* requires suppliers to ensure child labour is not used in the performance of their work, whether or not related to UTC business. Suppliers must comply with laws and regulations prohibiting human trafficking. This includes prohibiting the use of forced, bonded or indentured labour, involuntary prison labour, slavery, or trafficking in persons. The *Supplier Code* also provides that our suppliers will allow UTC and/or its representatives to assess their compliance, as well as the compliance of the supplier's business partners, with the expectations set forth in the *Supplier Code* in performing work for UTC, including on-site inspection of facilities. The *Supplier Code* is available [here](#).

Supplier Assessment: 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, UTC may conduct site visits with selected suppliers. However, in the ordinary course of business, UTC does not conduct site visits or otherwise evaluate 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 in complete confidence through UTC's Ombudsman Program.

This statement has been approved by our Executive Leadership Team on 18 February 2020.

Signed by **Christoph T. Feddersen – Vice President & General Counsel**

Collins Aerospace

31 March 2020

Collins Aerospace United Kingdom Operating Companies

Atlantic Inertial Systems Limited
B/E Aerospace (UK) Limited
BE Aerospace (UK) Europe Holdings Limited
BE Aerospace Global Holdings Limited
BE Aerospace Holdings (UK) Limited
BE Aerospace International Holdings Limited
BE Aerospace Thermal and Power Management Holdings (UK) Limited
Claverham Group Limited
Claverham Limited
Crompton Holdings Limited
Crompton Technology Group Limited
CT Group Limited
Delavan Limited
Goodrich (Great Britain) Limited
Goodrich Actuation Systems Limited
Goodrich Aerospace UK Limited
Goodrich Control Systems
Goodrich Controls Holding Limited
Goodrich Holding UK Limited
Goodrich Inertial Holdings Limited
Goodrich Limited
Goodrich Systems Limited
Hamilton Sundstrand UK Holdings Limited
HS Marston Aerospace Limited
Kidde Graviner Limited
Microtecnica Actuation Technologies Limited
Page Aerospace Limited
Page Engineering (Holdings) Limited
Pulse.Aero Limited
Quest Flight Training Limited
Rockwell Collins UK Limited
Rohr Aero Services Limited
Rosemount Aerospace Limited
Rosemount Aerospace Properties Limited
Silicon Sensing Products (UK) Limited
Silicon Sensing Systems Limited
Simmonds Precision Limited
Sonic.Aero Limited
SWAP (One) Limited
SWAP, United Kingdom
WASP Membranes Limited
Wessex Advanced Switching Products Limited

