



## Rockwell Collins Canada, Inc.

### MODERN SLAVERY STATEMENT

Rockwell Collins Canada, Inc. is committed to ensuring human trafficking, forced labor, and child labor (collectively, “modern slavery”) are not taking place in our business or supply chains. This statement sets out the actions taken for the financial year ending 31 December 2023 by Rockwell Collins Canada, Inc. to ensure modern slavery is not taking place in any part of our operations or supply chain.

#### Our Corporate Structure

Rockwell Collins, Canada Inc. is a part of RTX Corporation (“RTX”) and has federal registration with extra provincial registrations in Ontario and Quebec, Canada.

RTX is incorporated under the laws of the State of Delaware, USA and listed on the New York Stock Exchange (Ticker Symbol: RTX). RTX is an aerospace and defense company that provides advanced systems and services for commercial, military, and government customers worldwide. RTX, formerly known as Raytheon Technologies Corporation, is headquartered in Arlington, Virginia, U.S.A. As a global technology and innovation-driven company, we depend on a highly skilled workforce comprised of approximately 185,000 employees.

RTX consists of three principal business segments: Collins Aerospace Systems, Pratt & Whitney, and Raytheon; with each segment comprised of groups of similar operations.

- Collins Aerospace is a leading global provider of technologically advanced aerospace and defense products and aftermarket service solutions for civil and military aircraft manufacturers, commercial airlines, and regional, business and general aviation, as well as for defense and commercial space operations.
- Pratt & Whitney is among the world’s leading suppliers of aircraft engines for commercial, military, business jet, and general aviation customers.
- Raytheon is a leading provider of defensive and offensive threat detection, tracking and mitigation capabilities for U.S. and foreign government and commercial customers. Raytheon designs, develops, and provides advanced capabilities in integrated air and missile defense, smart weapons, missiles, advanced sensors and radars, interceptors, space-based systems, hypersonics, and missile defense across land, air, sea, and space.

Rockwell Collins Canada, Inc. is organized under Collins Aerospace.

As a part of the RTX family, we benefit from global, enterprise-wide policies and procedures aimed at preventing and mitigating the risk of modern slavery from occurring in our operations and supply chains (these are described in more detail in the below section titled, “Managing Modern Slavery Risks”).

## **Our Operations**

Rockwell Collins Canada, Inc. is committed to Canadian aerospace and defence as demonstrated by our ongoing investment in Canada for the development, production and support of advanced avionics and communications systems. Rockwell Collins Canada, Inc. in Ottawa specializes in the design, development, support, modeling and simulation of wireless, ad-hoc networking technologies for tactical applications used by the Royal Canadian Navy, coalition partners around the world, and the Canadian Army. The Ottawa facility also serves as a focal point for all Collins systems, services and repairs for Government of Canada customers. Rockwell Collins Canada, Inc. also maintains a substantial systems engineering presence in Montreal, providing system engineering services to Bombardier, one of the world's largest commercial and business aircraft manufacturers.

## **Our Supply Chain**

Rockwell Collins Canada, Inc. 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 a low risk for modern slavery and human trafficking (e.g., North America (U.S. and Canada), and Western 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.

## **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, forced labor, and child labor (collectively, “modern slavery”). 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 recognize that modern slavery has the potential to intersect with our supply chain where we do not have visibility, such as actors involved in the mining or extraction of certain raw minerals – many tiers removed from our suppliers. As described below in more detail, we have established policies and procedures to mitigate these risks.

### **Managing Modern Slavery Risks**

Rockwell Collins Canada, Inc. 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.

### RTX Human Rights Council

RTX established a Human Rights Council (HRC) consisting of leaders from each of the company's three business units and its relevant corporate functions. The HRC is responsible for overseeing a common framework to identify, assess, and address human rights risks associated with the company's operations and products.

### RTX Human Rights Policy

Respecting and protecting human rights is fundamental to how our people and businesses operate globally. In 2022, the Committee on Governance and Public Policy of the Board of Directors for RTX approved an enterprise-wide policy on human rights. A copy is available on RTX's website ([www.rtx.com](http://www.rtx.com)) under the heading "Our Responsibility – Resources."

### RTX Code of Conduct

RTX's global Code of Conduct (the "Code") is intended to inspire, guide and support our best performance – individually and collectively. The Code provides information about how we should conduct our business and hold ourselves to the highest standards of business conduct. 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 onboarding;*
- *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*
- *Formalize 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

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

RTX 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 RTX 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](#).

RTX 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

RTX recognizes 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 available to all employees training that is designed to raise awareness of the potential risks of modern slavery in global supply chains and how to identify “red flags” (based on the International Labour Organization’s Indicators of Forced Labor) and report concerns. In 2023, all RTX employees in the supply chain function were assigned this training.

## Supply Chain Expectations and Assessment Processes

Rockwell Collins Canada, Inc.'s 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.
- **RTX 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 RTX 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 RTX.
  - To allow RTX and/or its representatives to assess the supplier's compliance with the expectations set forth in the *Supplier Code* in performing work for RTX, including on-site inspection of facilities.

The *Supplier Code* is available in many languages under the "Suppliers" section of RTX's website ([www.rtx.com](http://www.rtx.com)).

- **RTX 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.
- **RTX Conflict Minerals Compliance Program:** RTX takes seriously reports that armed groups in the Democratic Republic of the Congo region partially finance the violent conflict by exploiting and trading of certain metals known as conflict minerals through forced labor to mine these minerals. RTX participates in and supports initiatives that encourage smelters and refiners across the globe to become validated through an independent third-party assessment as having management systems and sourcing practices that conform with an OECD-aligned due diligence program, such as the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Program (RMAP). As part of a RTX global enterprise-wide compliance program, each business segment

conducts risk-based due diligence on the origin of potential conflict minerals using an internationally recognized framework. Additional information can be found in the *RTX Conflict Minerals Policy Statement* available under the “Suppliers” section of RTX’s website ([www.rtx.com](http://www.rtx.com)).

- **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 is encouraged to 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:** Each of RTX’s three business segments are in the process of rolling out specific human rights-related questions in onboarding requirements for strategic suppliers and supplier certifications. Suppliers will be asked to certify whether they have policies and procedures in place to promote the protection of human rights within their operations and prohibit all forms of child labor, forced labor, or human trafficking in connection with the goods and services they provide to their customers.
- 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.

### **Measuring the Effectiveness of Our Actions**

The main mechanism for assessing the effectiveness of our controls against modern slavery resides within our Global Ethics & Compliance organization. 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.

### **Remediation Measures (not applicable)**

We have not identified any actual instances of modern slavery, including forced or child labor, in our activities and supply chains. As such, we have not needed to take remediation measures at this time.

### **Continuous Improvement Efforts to Mitigate Risk**

Since December 31, 2023, Rockwell Collins Canada, Inc. has taken, or intends to take the following steps as part of our regular business operations to continue to ensure modern slavery is not taking place in its organization or supply chain.

- 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 RTX Supplier Code of Conduct;
- Provide employees with training resources designed to increase awareness of ethics and compliance matters generally, as well as on recognizing 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 RTX or Rockwell Collins Canada, Inc.'s 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.

### **Applicability<sup>1</sup>**

This policy statement is consistent with the disclosure requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act..

### **Statement Approval and Attestation**

This statement has been approved by our Board of Directors on May 21, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above."

- Steven Mills
- Associate Director Engineering & Site Lead
- May 21, 2024



- I have the authority to bind Rockwell Collins Canada, Inc.

---

<sup>1</sup> For transparency, our ultimate parent company, RTX Corporation, also publishes a Statement on Modern Slavery and Human Trafficking under the "suppliers" section of its website ([www.rtx.com](http://www.rtx.com)) and some of our affiliates provide similar publications in response to the California Transparency in Supply Chains Act, the United Kingdom's Modern Slavery Act, Australia's Modern Slavery Act, or Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.