

ANTI-SLAVERY, HUMAN TRAFFICKING & CHILD LABOR

DECLARATION OF CONFORMITY

The following declaration is made on behalf of Universal Avionics Systems Corporation, a Delaware corporation, (collectively, “Universal Avionics”, “UA”, or the “Company”) in compliance with various country and territory laws, including but not limited to:

- the United Kingdom Modern Slavery Act of 2015;
- the Australia Modern Slavery Act of 2018;
- the EU Non-Financial Reporting Directive of 2023;
- the Canada Modern Slavery Act of 2023;
- the US Federal Acquisition Regulation final rule on Combating Trafficking in Persons (52.222-50); and
- the California Transparency in Supply Chains Act of 2023.

Company Overview

Universal Avionics has been in business for over four decades. UA is a manufacturer of avionics systems and performs avionics repair in accordance with various Airworthiness Authorities’ approvals. UA’s commercial avionics products and services are provided to aviation customers, whether individuals or commercial entities, in a worldwide setting, and as such, enter the stream of commerce in many countries. The Company has an environmentally responsible portfolio of products and services as set forth in the Company’s REACH/RoHS/Prop 65 Declaration, which is available upon written request via compliance@uasc.com or at <https://universalavionics.com>. UA is committed to maintaining high standards of corporate responsibility. UA also strives to maintain a global reputation for conducting business with integrity, high ethical principles, and compliance with laws and regulations governing the Company’s activities.

The Company’s Code of Business Conduct and Ethics (“Code”), which applies to all employees, prohibits all forms of human trafficking, child labor and forced labor. The Code also requires certain job tasks within UA to conduct due diligence (or support due diligence efforts), so that UA regularly reviews its supply chain to attempt to eliminate any suppliers who engage in human trafficking, child labor or forced labor. The Company’s Statement of Values reinforces

this Code. Both the Statement of Values and the Code of Business Conduct and Ethics are located on the Company's website at <https://universalavionics.com>. Our parent company, Elbit Systems, Ltd website is located at <https://elbitsystems.com>.

The Company's Supply Chain

Universal Avionics manufacturing facilities are located in the United States, and products are shipped to customers globally. UA sources raw materials, components, assemblies, and other hardware from suppliers across the globe. We work diligently to seek suppliers that share UA's values and endeavor to continually improve their environmental and social conditions for the benefit of their local communities and the entire planet. UA trains our employees, especially those in supply chain management, in the laws and issues regarding child labor, human trafficking, and require them to report any supplier or business partner to a member of the UA Senior Leadership Team through UA's Open Door Policy if a supplier may not be meeting UA's standards.

A. Risk Assessment

Universal Avionics is committed to operating ethically and with professional integrity at all levels of operations. UA supports and respects efforts to protect human rights and advance social and environmental sustainability. the Company's employees work of their own free will and UA does not permit human trafficking, child labor, forced labor, or other any other form of mental or physical coercion in the Company or with our suppliers. All employees of the Company are expected to comply with all applicable laws, rules, and regulations. Universal Avionics proactively seeks business partnerships that align with UA's core values and follow the highest standards of business conduct.

Universal Avionics is aware that a complex global supply chain may increase the risks of human trafficking, child labor, and forced labor when raw materials, components, assemblies, and other hardware pass through multiple tiers of suppliers and multiple countries. The Company will not knowingly conduct business with suppliers who do not comply with the fair, ethical, and legal treatment of workers, and UA adheres to recognized anti-trafficking and anti-forced labor principles and guidelines. If any suppliers are found to be in violation of such regulations, then UA may have to immediately replace such supplier.

B. Risk Mitigation

Universal Avionics' risk mitigation process includes the ability to:

- (i) Investigate potential issues with a supplier.

- (ii) Seek resolution from the supplier by working with the supplier to ensure that any issues or concerns are not actual verified human trafficking, child labor, and/or forced labor risks.
- (iii) If such investigation does show that the supplier is involved in such behavior, our risk mitigation process also includes termination of the supplier, as necessary to maintain the professional and ethical integrity of our supply chain activities, as well as the necessary legal interventions after working with the UA Legal Department and the Senior Leadership Team within UA.

If there are any questions, please reach out to us directly at +1.520.295.2300 or via email at compliance@uasc.com.

**Wendy M.
Bartos**

Digitally signed by Wendy M. Bartos
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Avionics Systems Corporation,
ou=Legal Department,
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Date: 2025.01.30 15:33:02 -05'00'

Signature

Wendy Bartos

Printed Name

General Counsel

Title

30 January 2025

Date