



Structure, business and supply chains

ETL Systems designs and manufactures RF equipment for critical satellite communications used by satellite operators and teleports around the world. ETL has offices in the UK, US and Canada, and a global customer base and supply chain. The Company operates under the leadership of the board of directors, comprising both executive and non-executive members.

It is the policy of ETL to conduct its business in an honest and ethical manner. ETL's Corporate Criminal Liability Code of Ethics embodies the standards and policies under which we operate. All staff, including directors, employees, temporary personnel, contract personnel, consultants, intermediaries, agents and third parties acting on behalf of ETL are required to comply with ETL's Code of Ethics.

Policies in relation to slavery and human trafficking

It is ETL's policy to comply with all national and international laws and regulations regarding slavery, child labour, human trafficking, labour standards and human rights expectations, including concordance of practice with the Modern Slavery Act 2015.

ETL complies with the International Labour Organisation (ILO) Child Labour Convention. Specifically, the Minimum Age Convention, 1973 (No.138) requirements, and the Worst Forms of Child Labour Convention, 1999 (No. 182) requirements. ETL will not use unlawful child labour, nor knowingly accept commodities, products and/or services from suppliers that employ or utilise child labour.

Due diligence processes in relation to slavery and human trafficking in our business and supply chains

We understand that our biggest exposure to Modern Slavery is in our product supply chains. ETL's **Supplier Management** and **Export Control Policy** mitigate risk of exposure to incidents of slavery and human trafficking through engagement with third parties.

Supplier Management

- **Supplier On-Boarding and Monitoring Process**
New Suppliers are added to a **Supplier Risk Register**, with legislative breach incorporated as a weighted factor. The register accounts for whether the supplier has signed up to ETL's **Supplier Code of Conduct** and/or whether the supplier is in a country that is at elevated risk in terms of governance. Advice supplied by World Governance Indicators is reviewed in relation to supplier locations.
- **Supplier Code of Conduct**
ETL's Supplier Code of Conduct outlines our expectations covering human-rights, employment practices and good governance; to propagate socially responsible business ethics. It is issued in the Supplier On-Boarding Process and addresses the following global legislation:
 - *All national and international laws and regulations regarding slavery, child labour, human trafficking, labour standards and human rights expectations.*
 - *the International Labour Organisation (ILO) Child Labour Convention. Specifically, the Minimum Age Convention, 1973 (No.138) requirements, and the Worst Forms of Child Labour Convention, 1999 (No. 182) requirements.*



Export Control and Sanctions Compliance

- ETL's Export Control Compliance Policies ensure compliance to UK and US export legislation and export controls.
- The Company carries out an annual review of ETL products and technologies against the Export Control Lists.
- A list of countries with Sanctions is published and reviewed by relevant staff to support compliance to sanctions in place.

Risk assessment and management

We have identified the areas that are at risk of slavery and human trafficking within the Company (in addition to the supply chain as addressed above). These are outlined in the sections below along with steps taken to assess and manage risks.

Recruitment

- ETL adheres to the Baseline Personnel Security Standard (BPSS) to safeguard all employees, ensuring rigorous background checks and robust recruitment procedures
- Recruitment staff are properly trained to identify potential signs of modern slavery, such as workers being accompanied by someone they don't know, lack of identification, or workers with inconsistent personal details.
- In cases where recruitment is carried out by an agency, ETL ensures that recruitment agencies are reputable, with a track record of ethical practices and publication of a modern-day slavery statement.

Logistics

- ETL will only engage with transport agents who have Authorised Economic Operator (AEO) status.
- ETL monitors and reviews governance practices of the main freight carriers.

Sales, Marketing and Distribution Network

- Distributors must sign up to Partner Agreements which stipulate compliance to ETL's Supplier Code of Conduct.
- The Sales and Marketing Team have Modern Slavery Training to enable any risks to be identified and flagged when meeting with customers and business partners.

Capital purchases

- ETL's in-house CapEx form requires due diligence to be carried out on new suppliers; for example, whether the supplier has governance statements in place (such as a Modern-Day Slavery Statement, Anti-Bribery and Corruption Statement, Code of Ethics).



Key performance indicators

ETL reports on the following to monitor effectiveness of steps being taken to ensure that slavery and human trafficking is not taking place in the Company or supply chains:

- Any identified cases of severe human rights issues and incidents
- Supplier Risk Register data
- Response rate to the Supplier Code of Conduct

To date there have been zero cases of human rights issues and incidents.

Training

- Modern Slavery training is a mandatory requirement for all staff. The training covers the following areas:
 - Magnitude of the problem
 - Modern Slavery Act 2015
 - Responsibilities under the Act
 - What modern slavery is
 - How to spot the signs
 - How to report it

Policy Review

This policy is reviewed and updated annually by the Board and published on the company website.

Associated documents

[ETL Supplier Code of Conduct](#)

[ETL Corporate Criminal Liability-Code of Ethics](#)

Approved by	Position	Date	Signed
Kevin Dunne	CEO	18 March 2025	