

Modern Slavery Act Statement-Fiscal Year 2022

TrellisWare Technologies, Inc. and its subsidiary, TrellisWare UK Limited (together, “TrellisWare”) is committed to conducting business with customers, suppliers, employees, and the communities in which we are based with the utmost integrity. We respect international principles of human rights, including those in the UK Modern Slavery Act of 2015, and embody these principles and commitments in our corporate policies. This statement sets out the ongoing steps we are taking to address and prevent forced labor, human trafficking, and related activities from taking place, both within our business and our global supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 by TrellisWare Technologies, Inc. (for itself and its subsidiary) for the fiscal year ending 31 March 2022.

TrellisWare’s Structure and Business

TrellisWare Technologies, Inc. is a privately held company based in San Diego, California, USA and incorporated under the laws of the State of Delaware, USA. The company launched in 2000 with an innovative culture striving to push technological boundaries in the areas of wireless communications. TrellisWare is now a leader in highly advanced algorithms, waveforms, and communications systems that range from small form factor radio products to fully integrated multi-function solutions. Our products are developed for and used by defense, emergency response, and commercial/industrial customers worldwide. Based in the UK, TrellisWare UK Limited is a wholly-owned subsidiary of TrellisWare Technologies, Inc. and helps bring TrellisWare solutions to customers in the UK and EU.

TrellisWare does not use slave labor in its own business, nor does it condone forced or compulsory labor, or human trafficking. Our aim is to maintain an inclusive environment where everyone is respected, valued, and welcomed. The majority of our business is within a highly regulated industry with extensive external oversight, and we employ a highly skilled workforce. We also endeavor to monitor our business to prevent such behavior from taking place inside the company. Due to these and other factors, we do not believe that we have a significant risk of modern slavery within our operations or workforce.

Our Supply Chain

Our global supply chain includes suppliers that provide parts, components, software, and services in support our radio and waveform business, subcontractors that provide services and customized products in support of our development contracts, and suppliers that support our internal operations. The products we procure are predominantly high-end technology or commercial off-the-shelf products. We procure from large multinational companies and from small and medium-sized businesses. Our procurement team utilizes various strategies to procure products and services from disadvantaged, women-owned, and veteran-owned businesses.

While we do not have a significant risk of modern slavery within our supply chain due to the nature of the goods and services we procure, the locations where most of our suppliers are located, and our internal due diligence processes, imported products—particularly items from third parties based outside of the USA, UK, and EU—are potentially more at risk of modern slavery issues. We have implemented

various policies and practices intended to manage forced labor and modern slavery risks inherent in a global supply chain that spans many industries. We describe some of those policies and practices below.

Standards of Business Conduct

As part of our commitment to combating modern slavery and human trafficking, we have developed and implemented various policies which are reviewed on a regular basis. Our Standards of Business Conduct (SBC) expresses TrellisWare's values and the behaviors expected of employees in their actions on behalf of the company. TrellisWare strives to maintain the highest standards of employee conduct and ethical behavior in all areas where we do business, and to only enter into supplier relationships which are based on lawful, efficient, and fair practice. Our SBC specifically states that TrellisWare will not knowingly use any supplier who breaks laws or regulations, engages in unethical activities, or engages in the use of forced, bonded or indentured labor, involuntary prison labor, slavery, or trafficking of persons. Copies of the SBC are available to all employees on our company intranet.

Reporting Mechanisms

TrellisWare is committed to a culture where people are encouraged and empowered to report behaviors that conflict with our company policies without fear of retaliation. The TrellisWare Employee Hotline, which can be accessed via phone or online, is a reporting channel to report any type of issue or concern, and reports can be submitted anonymously. Concerns raised through this (or any) reporting mechanism would be directed to the legal department for a thorough investigation. No reports or concerns related to modern slavery or human trafficking were made during the reporting period of this statement.

Internal Training

Our employees receive annual ethics and compliance training. Training packages are available to all employees on our company intranet.

Supply Chain Expectations and Due Diligence Processes

We endeavor to establish and build long-standing relationships with our suppliers and are clear on our expectations of business behavior. TrellisWare has the same expectations of our suppliers for ethics and compliance as we have for our own employees.

- **Supplier Code of Conduct.** It is expected that all suppliers to TrellisWare operate their own businesses in accordance with the highest ethical standards. All TrellisWare suppliers are asked to adhere to our Supplier Code of Conduct or confirm that they have equivalent standards and procedures in their own businesses. In addition to communicating TrellisWare's values, our code mandates full compliance with all applicable laws. Use of forced or involuntary labor (whether in the form of prison labor, indentured labor, slave labor, bonded labor, or otherwise) is strictly prohibited under our supplier code, and suppliers are asked to put adequate policies in place to ensure that their supply chains are also free of such abuses. TrellisWare expects its suppliers to police their own supply chains in order to prevent modern slavery of any kind.
- **Due Diligence / Qualification.** TrellisWare uses appropriate processes to qualify, on-board, and periodically revalidate suppliers to ensure compliance with regulatory and legal requirements.

Suppliers must complete a representations and certifications form which provides basic information about their business and inquires into their compliance environment and history.

- **Contractual Terms and Conditions.** Our standard supplier terms and conditions of purchase require suppliers to comply with all applicable laws and regulations and prohibit the use of forced, prison, or indentured labor. These terms also require the supplier to represent and warrant that all labor used in the creation of the goods and services to be procured comply with laws regarding slavery and human trafficking in the countries in which the supplier does business. Further, suppliers are required under the terms to include these contractual requirements in subcontracts related to the order.
- **U.S. Government Subcontractor Certification.** Subcontracts that directly support U.S. Government prime contracts must include Federal Acquisition Regulation (“FAR”) clause 52.222-50, Combating Trafficking in Persons (48 C.F.R. §52.222-50), where applicable. This clause contains a reporting obligation to notify the U.S. Government 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. It also requires us to take appropriate action against subcontractors that violate the U.S. Government’s policies against human trafficking as described in the clause. Suppliers must submit certifications where required by the FAR.

Going Forward

TrellisWare is committed to improving its policies and practices to combat slavery and human trafficking. We continue to monitor these risks within our business and supply chain and will adjust our anti-slavery and human trafficking initiatives accordingly.

Statement Approval

This statement has been approved by TrellisWare’s Board of Directors, which has authorized the Vice President, General Counsel & Chief Compliance Officer to review and update it periodically, as appropriate.

Signed by: Paul Konopka – Vice President & General Counsel

TrellisWare Technologies, Inc.