

Modern Slavery and Human Trafficking Statement



Rotron Aerospace Ltd (Ondas Group) – Defence & Aerospace Supply Chain

Financial Year: 2026

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken to ensure that modern slavery and human trafficking are not taking place in our operations or supply chains.

1 ORGANISATION AND BUSINESS

Rotron Aerospace Ltd is a UK aerospace engineering and manufacturing company specialising in propulsion systems and unmanned aerial technologies for defence and industrial applications. It operates as part of the Ondas Holdings Inc. group, a US-listed autonomous systems and critical communications technology organisation.

2 SUPPLY CHAINS

Our supply chain includes aerospace-grade materials, precision manufacturing, electronics, propulsion systems, subcontracted fabrication, and testing services. Suppliers are primarily located in the UK, US, and allied industrial jurisdictions.

3 POLICY FRAMEWORK

We maintain a zero-tolerance approach to modern slavery and human trafficking. Policies include:

- Code of Business Conduct and Ethics
- Supplier Code of Conduct
- Whistleblowing procedures
- Anti-bribery and corruption controls
- Procurement compliance standards

4 DUE DILIGENCE

We apply risk-based due diligence to suppliers including onboarding checks, contractual compliance clauses, and escalation procedures. Enhanced scrutiny is applied to higher-risk geographies and subcontracted labour chains.

5 DEFENCE-SECTOR RISK MANAGEMENT

Given the complexity of aerospace and defence supply chains, we apply layered risk controls including traceability requirements, supplier audits where appropriate, and compliance monitoring aligned to industry best practice.



6 TRAINING


Relevant personnel in procurement, operations, and compliance functions receive training on identifying and reporting modern slavery risks.

7 EFFECTIVENESS

We review supplier compliance, monitor reported concerns, and continuously improve governance frameworks to strengthen supply chain integrity.

8 APPROVAL

This statement is approved by the Board of Directors of Rotron Aerospace Ltd and will be reviewed annually.

Signed:  _____

Director: Alex Head

Date: 16/03/2026

APPENDIX

APPENDIX A – SUPPLIER CODE OF CONDUCT (SUMMARY)

1 Compliance with Laws

Suppliers must comply with all applicable laws relating to labour rights, human rights, and modern slavery.

2 Prohibition of Forced Labour

All forms of forced, bonded, or involuntary labour are strictly prohibited.

3 Child Labour

Child labour is strictly prohibited in accordance with applicable international standards.

4 Working Conditions

Suppliers must ensure safe, fair, and humane working conditions.

5 Wages and Benefits

Workers must receive wages and benefits that meet applicable legal standards.

6 Subcontracting

Subcontracting must not be used to conceal labour violations. Suppliers must ensure transparency across all tiers.

7 Right to Audit

Rotron reserves the right to request evidence of compliance or conduct audits where risk is identified.

8 Reporting Concerns

Suppliers must provide mechanisms for workers to report concerns without fear of retaliation.