

DEFENCE · CHAIN EVIDENCE · JUL 2026

Can I prove my chain is clean if asked tomorrow?

A sanctions name-screen can come back clear by exact text and still leave the buyer without public proof of full chain cleanliness.

1 LIVE SUPPLIER CHAIN · 1 PSC STOP · 1 SFO DPA PACK · 2 LIST SCREENS

RECORD FACTS ON THE FACE OF THE READ

0 hits

EXACT TEXT SCREEN ACROSS UKSL AND RETIRED OFSI CSVS FOR NAMED CHAIN TERMS

1

COMPANIES HOUSE PSC STATEMENT WHERE THE PUBLIC CHAIN STOPS

£10.083m

DPA FINANCIAL PENALTY COVERED BY PARENT UNDERTAKING IF NEEDED

§00

THE QUESTION

A compliance or commercial lead has to evidence chain cleanliness on demand, using public records first.

— THE BUYER QUESTION

Can I prove my chain is clean if asked tomorrow?

The short answer is bounded. The public record can evidence a named chain, a sanctions name-screen, a Companies House PSC stop and a parent undertaking in an SFO DPA pack. It cannot turn those records into a full proof of cleanliness.

The worked read is Ultra Electronics Limited, company number 02830644. It is active. Its public PSC path runs up through UK holding companies to Cobham Ultra Limited, company number 13552009. At that point Companies House records no active registrable PSC or relevant legal entity, only an active statement that there is none.

AT A GLANCE What can be evidenced before private diligence starts.

02830644	13552009	0	2029
ULTRA ELECTRONICS LIMITED	COBHAM ULTRA LIMITED PSC STOP	EXACT TEXT SANCTIONS-LIST HITS IN THIS SCREEN	DPA TERM END DATE IF NOT TERMINATED

SOURCE – Companies House profiles and PSC pages for 02830644, 14538792, 02830397, 13552764 and 13552009; SFO DPA pack; UKSL and OFSI CSV screens; all rechecked 2026-07-07.

READING CONTRACT

This is a **public-record evidencing read**. It is **not a forecast**, not legal advice, not sanctions advice, not investment advice, and not a finding that any named entity is sanctioned, excluded, debarred, non-compliant or unfit. The question is what the public record can evidence.

§01

FALSIFICATION

The failed hypothesis was tested first. It did not become the report.

— FALSIFICATION FIRST

The first idea did not survive. That is the point of the keel.

●BUILT

The current UK Sanctions List is the governing list.

GOV.UK says the UK Sanctions List is now the single source for all UK sanctions designations. The OFSI consolidated list closed on 28 January 2026.

●BUILT

The old delta route did not land.

The prior attempt could not find a defence-chain counterparty clean on the retired OFSI list but exposed on the governing UK list.

●INDICATED

The new screen returned zero hits.

Exact text screens of the named Ultra / Cobham / Advent terms returned no hits on both CSVs on 2026-07-07.

●BUILT

Zero hits are not the same as proof.

A list screen is a bounded search result. It does not evidence beneficial ownership or Procurement Act status.

THE LOCKED ANCHOR

The report is not a sanctions-list-delta story. It is a proof story: what a buyer can and cannot evidence from public records tomorrow morning.

SOURCE – GOV.UK UK Sanctions List page, modified 2026-07-07; GOV.UK single-list guidance; UKSL CSV report date 07-Jul-2026; retired OFSI CSV last updated 03/06/2026; aborted attempt record read 2026-07-07.

Aborted order record + list screens

E1

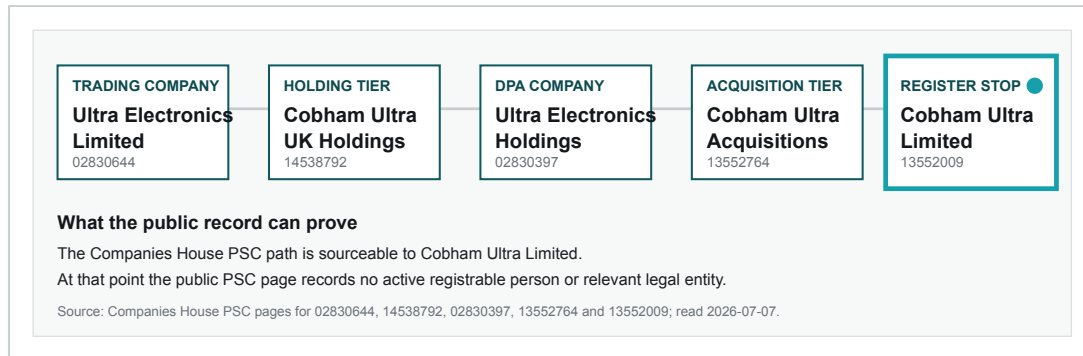
— THE READ · CHAIN

FINDING 1

The public chain can be walked across Companies House PSC pages.

The named supplier path reaches a Companies House PSC stop.

E1 Public PSC path from Ultra Electronics Limited to Cobham Ultra Limited.



Credit: Lansary document-plate schematic from Companies House PSC pages. Licence: original schematic from public records. Source pages rechecked 2026-07-07.

SOURCE – Companies House PSC pages for 02830644, 14538792, 02830397, 13552764 and 13552009; rechecked 2026-07-07.

The chain is not speculative. Each hop is on the Companies House PSC register. The register also defines where the public chain stops: Cobham Ultra Limited is active, but its PSC page does not name another registrable person or relevant legal entity.

That is not a fault claim. It is an evidencing limit. A buyer can document the stop, but cannot convert it into full beneficial-ownership proof without more material.

BUYER ANSWER

If asked tomorrow, the buyer can evidence the chain to Cobham Ultra Limited and the register stop. The buyer cannot evidence the whole control picture from Companies House alone.

E2

FINDING 2

The stop is not a guess. It is the active Companies House statement.

— THE READ · REGISTER STOP

The chain stops on a no- registrable-person statement, not on a named apex.

E2 What the Cobham Ultra Limited PSC page records.

<p>●BUILT</p> <p>Company number 13552009.</p> <p>Cobham Ultra Limited is active and was incorporated on 6 August 2021.</p>	<p>●BUILT</p> <p>0 active PSCs.</p> <p>The PSC page does not list an active registrable person or relevant legal entity.</p>
<p>●BUILT</p> <p>1 active statement.</p> <p>The statement says the company knows or has reasonable cause to believe there is no registrable PSC or RLE.</p>	<p>●INDICATED</p> <p>Proof gap for a buyer.</p> <p>The buyer can evidence the statement. The buyer cannot evidence full beneficial ownership from that statement alone.</p>

SOURCE – Companies House profile and PSC page for Cobham Ultra Limited, company number 13552009; rechecked 2026-07-07.

This is the point where a sanctions-only workflow is too thin. A list screen can say the screened names did not appear in the list text. The Companies House chain says the public PSC route has reached a statement rather than a named apex.

For a compliance lead, those are different evidence objects. One is a no-hit search result. The other is a register stop that needs private confirmation if the buyer has to evidence full chain cleanliness.

WHAT CHANGES IN THE FILE

The evidence file should show the PSC stop explicitly. If it only stores a sanctions-screen screenshot, it has not answered the buyer question.

E3

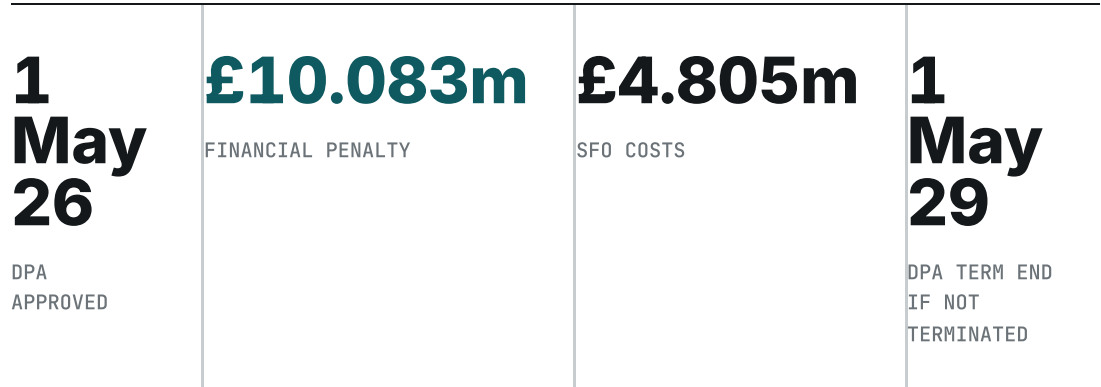
— THE READ · UNDERTAKING

FINDING 3

Cobham Ultra Limited is not just the PSC stop; it is the parent undertaking party in the DPA pack.

The same parent name carries public DPA obligations.

E3 The public DPA pack changes what "clean proof" has to hold.



SOURCE – SFO DPA with Ultra Electronics Holdings Limited; Cobham Ultra Limited undertaking dated 2026-04-28; GOV.UK SFO news page published / updated 2026-05-01; parsed and rechecked 2026-07-07.

The undertaking by Cobham Ultra Limited says it has to ensure performance of Ultra Electronics Holdings obligations under the DPA. It also has to assume responsibility for the specified penalty and costs if Ultra Electronics Holdings fails or is unable to pay, and keep Ultra Electronics Holdings valid, registered and within Cobham Ultra control or ownership for the term.

The DPA caveat matters. The court did not make findings of fact and did not determine individual culpability. The Statement of Facts also records that the Cobham / Advent acquisition post-dates the conduct described. The report therefore treats the DPA pack as a public probity and obligation record, not as a current-owner misconduct claim.

BUYER ANSWER

A public chain-clean file should not stop at sanctions lists. It should also hold the parent undertaking record that sits on the same public chain.

E4

FINDING 4

The no-hit result is useful. It is not the same as a chain-clean proof.

— THE READ · LIST SCREEN

Two list screens returned no hits, but the proof question remains open.

E4 Screened terms and result boundary.

<p>UK SANCTIONS LIST</p> <p>Report date 07-Jul-2026.</p> <p>Exact text screen returned zero hits for Ultra Electronics, Ultra Electronics Holdings, Cobham Ultra, Cobham Group, Advent International, AI Convoy and Lockheed Martin.</p>	<p>RETIRED OFSI CSV</p> <p>Last updated 03/06/2026.</p> <p>The same exact text screen returned zero hits. The file is not the governing list after the 28 January 2026 closure.</p>
<p>USEFUL EVIDENCE</p> <p>A bounded name-screen can be stored.</p> <p>The file can show date, list version, terms screened and zero-hit result.</p>	<p>BOUNDARY</p> <p>No clearance certificate.</p> <p>The result does not evidence beneficial ownership, associates, control, Procurement Act status, or non-public facts.</p>

SOURCE – <https://sanctionslist.fcdo.gov.uk/docs/UK-Sanctions-List.csv> downloaded 2026-07-07; <https://ofsistorage.blob.core.windows.net/publishlive/2022format/ConList.csv> downloaded 2026-07-07; GOV.UK single-list guidance.

The screen is still worth doing. It is just not the same evidence object as a chain-clean proof. The current list is the list that matters, and the retired OFSI file is only useful here as a falsification check against the failed old anchor.

A good file says exactly what was screened and what was not. It names the list, the report date, the terms and the search method. It does not overstate the result.

WHAT CHANGES IN THE FILE

The file should read "no exact text hits for named terms on this date", not "supplier clean".

§02

PERIMETER

The legal frame explains why evidence matters; it is not used to make a legal conclusion.

— THE LEGAL PERIMETER

The Procurement Act question is an evidence question before it is a conclusion.

E5 What the public report can safely say.

<p>●BUILT</p> <p>Section 57 sets the exclusion / excludable supplier frame.</p> <p>The Act uses exclusion grounds, associated persons, continuing circumstances and debarment-list entries.</p>	<p>●BUILT</p> <p>Bribery Act section 7 is a failure-to-prevent offence.</p> <p>The SFO DPA and indictment record section 7 counts for Ultra Electronics Holdings.</p>
<p>●INDICATED</p> <p>The public pack creates diligence work.</p> <p>It gives a buyer public obligation and probity records to document.</p>	<p>UNPROVEN</p> <p>The report does not decide exclusion status.</p> <p>That is a legal and authority-specific decision outside this public-record read.</p>

SOURCE – Procurement Act 2023 section 57 and Schedule 6, as enacted; Bribery Act 2010 section 7; SFO DPA and indictment PDFs; read 2026-07-07.

The distinction keeps the report inside its lane. Public records show the DPA, the undertaking, the PSC chain and the list screen. They do not let this report decide whether a supplier is excluded, excludable, debarred, sanctioned or non-compliant.

That boundary is commercially useful. The buyer can ask for a proof pack without turning a public record read into legal advice.

BUYER ANSWER

The file should separate facts, screens, register stops and legal conclusions. Only the first three are public-record deliverables here.

§03

ACTION FILE

A clean chain file is an evidence pack, not a sentence in a CRM note.

— THE ANSWER

What a buyer can put in the file by tomorrow morning.

●BUILT · CHAIN

Companies House path.

Store the dated profile and PSC pages for each tier from Ultra Electronics Limited to Cobham Ultra Limited.

●BUILT · PROBITY RECORD

DPA pack and undertaking.

Store the DPA, Statement of Facts, undertaking, indictment and SFO case/news pages with dates.

●BUILT · STOP

Register - stop evidence.

Store the Cobham Ultra Limited PSC statement and label it as a public-record limit.

●INDICATED · LIST SCREEN

Sanctions evidence.

Store the current UKSL CSV report date, screened terms and zero-hit result; keep OFSI only as retired-list context.

That pack is useful and honest. It answers the immediate public-record question and shows the buyer where the file stops. The private follow-up is then precise: beneficial-owner confirmation beyond the Companies House stop, sanctions counsel sign-off if needed, associate and connected-person checks, DPA-compliance evidence, and procurement-law advice where the buyer faces a live tender or framework decision.

The public record does not close those lines. It gives the buyer a dated, source-backed map of why they need to be closed.

SOURCE – LOCKED-READ claim ledger C01-C25; Companies House, GOV.UK SFO, UK Sanctions List, retired OFSI CSV and legislation.gov.uk sources rechecked 2026-07-07.

§04

SCOPE LOCK

This report is about evidencing cleanliness under time pressure, not ownership tracing for its own sake.

— DE-OVERLAP

This is not Boxer, STS, concentration or a sanctions allegation.

NOT LB-DEF-2026-03 / 04

Not ownership tracing as the product.

The PSC chain is used only because a cleanliness proof has to say where public ownership evidence stops.

NOT LB-DEF-2026-05

Not an M&A target dependency read.

The buyer here is a compliance or commercial lead, not a corp-dev model owner.

NOT LB-DEF-2026-09

Not portfolio concentration.

The report uses one public chain to test provability, not to count exposure across a portfolio.

NOT A SANCTIONS FINDING

No named entity is labelled sanctioned or unclean.

The sanctions screen returned zero exact text hits; the issue is the proof boundary beyond that screen.

APEX FENCE

This framework is not yet adopted as an external mandate. The publication surface is descriptive, not predictive. Named-entity statements are register facts only. The operating method remains private.

THE DISCIPLINE

A chain-clean report should be harder on the word "prove" than on the word "screen".

§05

SOURCE
REGISTER

Every public claim is in the locked read with source URL and date.

— SOURCE REGISTER

Primary sources used in the public read.

S1	Companies House. Ultra Electronics Limited profile and PSC page, company number 02830644; read 2026-07-07.
S2	Companies House. Cobham Ultra UK Holdings / Ultra Electronics UK Holdings PSC page, company number 14538792; read 2026-07-07.
S3	Companies House. Ultra Electronics Holdings Limited profile, PSC and charges pages, company number 02830397; read 2026-07-07.
S4	Companies House. Cobham Ultra Acquisitions Limited profile and PSC page, company number 13552764; read 2026-07-07.
S5	Companies House. Cobham Ultra Limited profile, PSC and charges pages, company number 13552009; read 2026-07-07.
S6	GOV.UK / SFO. SFO news page "SFO secures GBP10m from British defence supplier", published / updated 2026-05-01; read 2026-07-07.
S7	GOV.UK / SFO. SFO case page for Ultra Electronics Holdings Limited, published 2024-11-29 and modified 2026-05-26; read 2026-07-07.
S8	SFO PDFs. DPA, Statement of Facts, Cobham Ultra undertaking and indictment, all on assets.publishing.service.gov.uk; parsed 2026-07-07.
S9	GOV.UK sanctions. UK Sanctions List page and single-list guidance; UKSL CSV report date 07-Jul-2026; read / screened 2026-07-07.
S10	OFSI retired CSV. Consolidated list CSV, last updated 03/06/2026; downloaded / screened 2026-07-07 as retired-list context.
S11	Legislation.gov.uk. Procurement Act 2023 section 57 and Schedule 6; Bribery Act 2010 section 7; read 2026-07-07.
S12	The Gazette. Company search for Ultra Electronics Holdings Limited, company number 02830397; read 2026-07-07.

EVIDENCE STATUS

The fuller claim ledger is locked in defence-06/LOCKED-READ.md. This report uses public records only. No NDA, OSA, client, classified, paid or non-public material was used.

FINAL READ

The public record can support a bounded evidence pack. It can show the named Companies House chain, the PSC stop, the SFO DPA undertaking, and the dated sanctions-list screens. It cannot prove full chain cleanliness on its own.

USE BOUNDARY

This is not sanctions advice, legal advice, investment advice or an assurance opinion. It is a public-record briefing for a buyer who needs to know what can be evidenced before private diligence starts.

METHOD BOUNDARY

the operating method remains private. The customer surface receives the claim ledger, source register, proof statuses and public-record answer only.