

Avtrade Group Modern Slavery Act Statement

Fiscal year 2018/2019



INTRODUCTION

Avtrade is committed to raising awareness of and improving procedures and policies to combat modern slavery and human trafficking. We fully understand our obligations under the Modern Slavery Act 2015 and have robust procedures in place to comply with legislation.

ORGANSIATION STRUCTURE AND SUPPLY CHAIN

Established in 1985 Avtrade is the World's largest independently owned commercial aircraft component provider to the aviation industry specialising in bespoke component support solutions. Avtrade Holdings is the parent company to Avtrade Limited and Avtrade Leasing Limited. In accordance with the Modern Slavery Act 2015 this statement and our Policy apply to both Avtrade Holdings and Avtrade Limited.

Avtrade Holdings and Avtrade Limited remain committed to ensuring that there is no modern slavery or human trafficking in our supply chain or any part of our business.

MODERN SLAVERY ACT POLICY

This policy outlines the measures Avtrade has in place to ensure that we eradicate slavery and human trafficking from our supply chains.

Monitoring our suppliers is an integral part of Avtrade's Quality System and since 2016 we have included in our supplier audit documents reference to our Modern Slavery Act Policy together with questions requesting information from our supply chain, and a commitment from suppliers that they conduct their business with the same compliance to ethical business practices as Avtrade.

The requirement of our Modern Slavery Act Policy is that our suppliers:

- DO NOT use forced or compulsory labour;
- ENSURE THAT the overall terms of employment are voluntary;
- COMPLY WITH all legislation regarding minimum age requirements;
- COMPLY WITH all legislation regarding excessive working hours;
- ENSURE THAT any sub-contractors or suppliers from whom they source goods and/or services for onward supply to Avtrade also adhere to these requirements.

Suppliers who do not adhere to the requirements of our Modern Slavery Act Policy will be reminded of Avtrade's commitment to anti-slavery and human trafficking and will be asked to conform to our requirements in order to remain an approved supplier.

Suppliers who fail to remedy any breach in our Modern Slavery Act Policy, or who refuse to comply with the terms of the Policy will be removed from our approved suppliers list with immediate effect.

Suspected breaches of Avtrade's Modern Slavery Act Policy should immediately be reported to Avtrade via email at compliance@Avtrade.com or via telephone on +44 1273 833 330 requesting the Compliance department.

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TRAINING AND AWARENESS

All new employees are given advice and training about modern slavery and human trafficking at induction and instructed to read our Modern Slavery Act Policy and Statement.

Existing employees are regularly reminded of Avtrade's Modern Slavery Act Policy and Statement, the requirements contained within and that compliance to the Policy is the responsibility of all employees.

PROGRESS MADE

Avtrade continues to ensure that all existing and new suppliers fully comply with the UK Modern Slavery Act 2015 and Avtrade's Modern Slavery Act Policy as part of our Supplier Approval Process.

For the purposes of this Statement and Avtrade's Modern Slavery Act Policy, suppliers means not only those suppliers of commercial aircraft components, but includes suppliers of promotional material, packing equipment, office supplies and services such as window and car cleaning and site maintenance.

SUPPLIER / SERVICES RISK ANALYSIS

SUPPLIES / SERVICES	% OF AVTRADE'S BUSINESS	RISK	ACTION
Window cleaning / maintenance	very small	Minimal	None required
Promotional material	very small	Minimal	None required
Office supplies	very small	Minimal	None required
Packing material and equipment	very small	Minimal	None required

COMMITMENT

Avtrade Holdings and Avtrade Limited constantly look at ways to increase awareness and understanding of the requirements of the UK Modern Slavery Act for both our workforce and external suppliers.

The Avtrade Group remains committed to ensuring compliance with all anti-slavery and human trafficking legislation.

GRAEME BROOKS
THE AVTRADE GROUP
31 July 2019