

THE AEROTRON GROUP OF COMPANIES

The Group companies are but not limited to: Total Aircraft Product Support (Holdings) Limited, Aerotron Limited, Aerotron Avotec Limited, Aerotron Leasing Services Limited, Aerotron Leasing Ireland, Aerotron Military Services Limited, Aerotron Consumable Services Limited, Aerotron Rotary Limited and Aerotron Composites Limited.



Anti-slavery and human trafficking policy For the Aerotron Group of Companies

THE AEROTRON GROUP OF COMPANIES

This policy applies to all persons working for the Aerotron Group of Companies, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

The Aerotron Group strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

The Aerotron Groups Commitment.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

We shall be a group of companies that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk based approach we may require:
 - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the code
 - As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

THE AEROTRON GROUP OF COMPANIES

This Aerotron Group of Companies policy is approved by the Aerotron Board; it represents the Aerotron Groups board direction to the business on this topic. Compliance with this policy is mandatory through aligning the Aerotron Groups Management System processes and people behaviours to the commitments made.

Monitoring and reviewing

The Aerotron Group's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

This policy does not form part of an employee's contract of employment and The Aerotron Group may amend it at any time so to improve its effectiveness at combatting Slavery, Human trafficking and indentured servitude.

Signed by the below on behalf of the Aerotron Group Board:

Name: Neil Westley
Position: Operations Director Aerotron Group
Date: 04/04/2019
Signature: 