



The Aerotron Groups Modern Slavery Act Statement Fiscal year 2019/2020

Introduction

The Aerotron Group of Companies are committed to raising awareness of modern slavery and Trafficking and improving our procedures and policies to maintain, improve and comply with the legislation of the slavery act 2015 and have robust procedures in place to enable compliance.

Organisation Structure and supply chain

The Aerotron group of companies provide Manufacturing, supply, repair and support services to the aviation industry.

The Aerotron Group of companies are: Total Aircraft Product Support (Holdings) Limited, Aerotron Limited, Aerotron Avotec Limited, Aerotron Leasing Services Limited, Aerotron Leasing Ireland, Aerotron Consumable and Military Services Limited, Aerotron Rotary Limited, Aerotron Pte Limited, Aerotron Composites Limited and Aerotron Engine services (Ireland) Limited.

Our supply chain mainly consists of airlines and aviation related repair shops with Small ancillary suppliers for stationary and other day to day equipment needs.

The Aerotron Groups Policy with regards to Modern Slavery

It is the intention of the Aerotron Group of companies to follow the guidance, as laid out in our Anti-Slavery policy, to ensure that our suppliers are monitored for compliance.

Monitoring suppliers is already part of our quality system and as a new improvement to this we are adding references to our modern slavery policy requirements for our suppliers. We will also be seeking a commitment from those suppliers that they conduct their business in compliance with our ethical business practices.

- 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.



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Training

All new employees are advised of the group policy on Slavery and human trafficking at induction and are instructed to read the Groups Anti-Slavery policy.
Existing employees are reminded of this policy and statement on an annual basis at their review meeting.

The Aerotron Groups Commitments

We shall be a group of companies that expects everyone working with us or on our behalf to safeguard against modern slavery:

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

We are Committed to the prevention, detection and reporting of modern slavery in any part of our organisation or supply chain.

Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of our Anti-Slavery policy.

We are committed to having a zero-tolerance approach to modern slavery in our organisation and our supply chains.

Monitoring and reviewing

We will continue to ensure that all existing and new suppliers fully comply with the Modern Slavery act 2015 and the groups' Anti-slavery policy as part of our supplier review and approval process.

The Aerotron Group may amend this policy at any time so as to improve its effectiveness at combatting Slavery, Human trafficking and indentured servitude.

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

Neil Westley
Operations Director Aerotron Group
07/08/2020