

Avtrade Group Anti-Slavery & Human Trafficking Policy Statement

For the financial year ended 31 July 2020 and published 26 January 2021

INTRODUCTION

This statement is made in pursuant to section 54, part 5 of the Modern Slavery Act (the ‘Act’); it outlines the steps taken by Avtrade during the financial year ending 31 July 2020 to ensure that modern slavery is not taking place in any area of its business operation and supply chain.

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

This is Avtrade’s fourth statement made under the Act and has been prepared by C.E.O. Graeme Brooks. Previous statements can be viewed upon request.

ORGANISATION STRUCTURE AND SUPPLY CHAIN

Avtrade Limited and sister company Avtrade Leasing Limited are owned by Avtrade Holdings Limited and this statement covers the business activities of all three entities. For the purposes of this statement, any reference to Avtrade includes Avtrade Limited, Avtrade Leasing Limited, and Avtrade Holdings Limited. Avtrade Holdings Limited was established in 2001, undertakes no trading activity and has no employees.

Established in 1985, Avtrade Limited is a leading global aircraft component service provider to the aviation industry, specialising in bespoke aircraft component support solutions. With a UK Headquarters and global offices in Dubai, Singapore, Moscow, Miami and China, Avtrade provides an extensive range of services through local support and dedicated account management to customers worldwide. As of 31 July 2020, Avtrade Limited employed over 200 multilingual and multicultural employees who delivered a range of global solutions to over 800 airlines, 24 hours a day, 365 days a year. These include Inventory Management, Repairs, Pooling, Leasing and Sale, Loan & Exchange. All employees are governed by the national laws of the country in which they work and Avtrade utilises the expertise of local lawyers to ensure compliance with all relevant employment law legislations.

Avtrade Leasing was established in 1998 to provide component rental and lease support to airline and maintenance facility customers. It employs no personnel but utilises the workforce of Avtrade Limited and its processes and procedures mirror those of Avtrade Limited.

Avtrade’s supply chains include providers of aircraft components, component maintenance services, packing material and equipment, office and promotional supplies and cleaning and maintenance of our offices and warehouses. Suppliers may be based anywhere in the world and we are committed to ensuring that any provider used by Avtrade complies with the Act, and Avtrade’s approved supplier process.

POLICIES

Avtrade continues to provide targeted modern slavery and human trafficking awareness for all procurement and vendor management staff and employees who work in high risk areas.

The C Suite and key individuals understand their roles and accountability in relation to the Act.

All supplier contracts have clauses relating to the Act.

All suppliers and vendors are monitored through Avtrade's quality system and since 2016 supplier audits have included reference to the Act, with requirement for suppliers to commit to complying with all legislation around anti slavery and human trafficking.

Avtrade's requires that its 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 exceeding working hours;
- ENSURE that any sub-contractors or suppliers from whom they source good and services for onward supply to Avtrade adhere to these requirements.

Suppliers who do not comply with the requirements of Avtrade's Modern Slavery Act Policy will be reminded of Avtrade's commitment to adherence to the Act and will be asked to fully conform to Avtrade's requirements or shall have their approved supplier status removed.

Other relevant policies include Avtrade's Code of Conduct, Equal Opportunities and Whistleblowing.

TRAINING AND AWARENESS

It is in raising awareness of the impact of Modern Slavery and through global organisations taking the responsibility of working with their supply chains that Modern Slavery will be eradicated. Avtrade remains committed to ensuring its employees are aware, understand and reject Modern Slavery and Human Trafficking.

All employees, consultants, vendors and suppliers of Avtrade are made aware of the impact of Modern Slavery, as well as Avtrade's commitment to reducing it within our industry. They are encouraged to discuss any concerns they have with their line manager, the compliance department and ultimately the Chief Policy Officer.

Avtrade continues to assess the risks of Modern Slavery on our business and industry, how it is and can be further addressed through policy, awareness and education, and what progress and further training is needed to eradicate it from global society.

NEXT STEPS

Avtrade recognises that all areas of its business and of the wider aviation industry must work together to ensure the eradication of Modern Slavery across the globe.

During 2021 Avtrade will review its due diligence processes and will enhance the Know Your Customer/Counterparty investigations which will include specific areas for modern slavery. Any entity posing a higher risk from modern slavery will go through an enhanced due diligence process.

Avtrade will continue to engage with and monitor all suppliers to ensure they understand what constitutes Modern Slavery and how it is unacceptable in Avtrade's supply chain. Vendor Management processes will continue to be regularly audited to ensure all suppliers are approved in accordance with the Modern Slavery Policy and comply with the Act.

All employees must read and acknowledge Avtrade's Employee Handbook setting out all relevant policies together with attending awareness training on the impact of Modern Slavery.

Avtrade will regularly utilise resources such as antislavery.org, the global slavery index and those suggested by organisations such as the International Labour Organisation, United Nations and the UK Government to ensure any changes to legislation and best practice are understood and implemented by Avtrade as swiftly and effectively as possible.

Graeme Brooks
C.E.O.
Avtrade Group of Companies

26 January 2021