



**AVTRADE**  
THE GLOBAL COMPONENT  
SERVICE PROVIDER

# **Avtrade Group Anti-Slavery & Human Trafficking Policy Statement**

**For the financial year ended 31 July 2022 and published 16 January 2023**

## **INTRODUCTION**

This statement is made pursuant to section 54, part 5 of the Modern Slavery Act (the ‘Act’). In it, we wish to outline the steps taken by Avtrade during the financial year ending 31 July 2022 to ensure that modern slavery is not taking place in any area of our 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 across our Group.

## **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. Avtrade Leasing was established in 1998 to provide commercial aircraft component rental and lease support to airline and maintenance facility customers, it has no employees but utilises the workforce of Avtrade Limited and its processes and procedures mirror those of Avtrade Limited.

Established in 1985, Avtrade Limited is a leading component service provider to the aviation industry, offering bespoke aircraft component support solutions including Inventory Management, Component Support, Repair Management, Pooling, Leasing, Sale, Loan and Exchange. From our UK Headquarters and global offices Avtrade provides an extensive range of services through local support and dedicated account management to customers worldwide. As of 31 July 2022, Avtrade Limited employed over 250 multilingual and multicultural employees.

Avtrade’s supply chains include providers of aircraft components and component maintenance services, as well as packing material and equipment, office and promotional supplies and cleaning materials for our offices and warehouses. We use global suppliers and are committed to ensuring that any provider used by Avtrade complies with the Act, and our Vendor Approval process.

## **POLICIES**

Avtrade continues to provide modern slavery and human trafficking awareness and training for all employees and representatives.

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

Contractual agreements written by Avtrade commit all parties to comply with 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 relevant legislation.

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 goods 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 and third parties working with Avtrade are made aware of the impact of Modern Slavery, as well as Avtrade's commitment to reducing it within our industry. We encourage any employee with concerns to raise issues with their line manager, or directly to our Chief Compliance Officer. Any third party with concerns is encouraged to contact the Chief Compliance 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 our financial year ending 31 July 2023 Avtrade will continue to 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](https://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**

**16 January 2023**