

## 1. About Avtrade:

Serving aviation since 1985, Avtrade is a leading global component service provider to the aviation industry, specialising in bespoke aircraft Component and Support Solutions. With 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.

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.

## 2. Our Policy:

Avtrade Holdings and Avtrade Limited are fully committed to ensuring that neither their employees, contractors nor suppliers use slave labour or engage in human trafficking.

This policy outlines the efforts made to seek to 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 Anti-Slavery and Human Trafficking 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 policy is that our suppliers:

- will not use forced or compulsory labour;
- will ensure that the overall terms of employment are voluntary;
- will comply with all legislation regarding minimum age requirements;
- will comply with all legislation regarding excessive working hours;
- will 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 these requirements 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 policy will be removed from our approved suppliers list with immediate effect.

Violations in Avtrade's Anti-Slavery and Human Trafficking Policy can be reported confidentially to Avtrade and we encourage the reporting of any known issue to [compliance@avtrade.com](mailto:compliance@avtrade.com) or on tel +44 1273 833 330 requesting the Compliance Department.

## 3. Progress made Fiscal Year 2017/2018

We continue working towards the existing policy as displayed on our website [www.avtrade.com](http://www.avtrade.com).

We ensure all existing and new suppliers are in compliance with the UK Modern Slavery Act 2015 as part of Avtrade's supplier approval process.



# Slavery and Human Trafficking Statement Fiscal Year 2017/2018

Suppliers means not only those for the commercial aircraft components we supply to customers, but includes promotional material, packing material, office supplies, equipment supply and the supply of services such as window cleaning and maintenance as detailed below:

<b>Supplies</b>	<b>Percentage of Avtrade's Business</b>	<b>Risk Factor</b>	<b>Action</b>
Window cleaning and maintenance Services	Very small	Low	None
Promotional material and office supplies	Very small	Low	None
Packaging material and equipment	Very small	Low	None

#### 4. Training

All existing employees are regularly reminded of Avtrade's Policy and the requirements contained within and we continue to train all new employees on the Policy to create awareness and understanding of the subject matter and its importance within their organisation.

#### 5. Avtrade Commitment

Avtrade Holdings and Avtrade Limited remain committed to ensuring compliance with all relevant legislation and operate a zero-tolerance approach to modern slavery and human trafficking.

Signature:

Name: GRAEME BROOKS

Position: Director, Avtrade Holdings and Avtrade Limited

Date: 31 July 2018