

**MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31.12.2018 ISSUED  
PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015**

This statement is made following section 54 of the Modern Slavery Act 2015. Gardner Aerospace Holdings Limited and its subsidiaries, ["Gardner"] is committed to supply Modern Slavery Statement for the financial year ended 31 January 2018.

**Our business, structure and supply chains**

Gardner is an international manufacturer of aerospace finished components, comprising of simple to highly complex and small to very large machined and sheet metal fabricated detailed parts, with substantial speed shop, assembly and kitting capabilities. We employ approximately 2250 people.

Gardner operates through subsidiary companies in UK, Poland, India, France, soon to be China and has a representative in the USA. Our main purchases are materials for aluminium parts, chemicals, standard parts for assembly and tools that have been purchased from European / US manufacturers

This statement is made according to s.54 of the Modern Slavery Act 2015 and sets out the steps that Gardner has taken and is continuing to take to ensure that modern slavery or human trafficking is not occurring within our business or supply chain.

There is no tolerance for modern slavery in our company. We act loyally, ethically and with integrity in all business activities. We put effective systems and controls in place to protect against any type of modern slavery occurring within the business or our supply chain.

**Our policies**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

[HTTP://WWW.GARDNER-AEROSPACE.COM/STRATEGIC-SOURCING/](http://www.gardner-aerospace.com/strategic-sourcing/)

Our Modern Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Relevant policies adopted by the organisation to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in our operations.

- Sourcing Manual
- Occupational Health, Safety & Environmental Manual
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- CSR Policy
- Recruitment & Selection Policy
- Anti-Harassment & Bullying Policy

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## Due diligence processes

Due diligence is undertaken by Gardner including when taking on new suppliers and when reviewing its existing suppliers.

The Supplier Selection process within the Gardner Aerospace supply chain shall:

- Be clear and concise with logical steps
- Review Risk management
- Be transparent in terms identifying the Supplier Selection and task within the process
- Provide a clear indication of the activities required
- The process for escalating issues and concerns within the relevant site
- Identify tools to be used during the process.

## Steps to assess and manage risks

Given the nature of our suppliers, we consider the risk of slavery or human trafficking within our supply chain is low.

Gardner risk assessment considers working with recruitment agencies to be a higher risk area due to the potential for the Workers charged illegal recruitment fees, workers uninformed or misinformed about terms of employment, workers not provided with understandable, legally compliant written contracts, fraudulently charging fees for travel, health checks or work documentation, false Right To Work in the UK documentation

Key suppliers to Gardner are risk assessed and scored across a number of different areas. Suppliers must comply with the Modern Slavery Act 2015 and have a Human trafficking policy in place – this is a binary requirement and failure to comply will result in the supplier not being approved for use.

In addition to this, Gardner's Terms & Conditions of Purchase specifically mandate that the supplier must comply with the Modern Slavery Act 2015.

## Training

All senior managers, supply chain and HR staff will have to complete training on modern slavery.

Gardner training will cover:

- principles of the Modern Slavery Act 2015
- how employers can identify and prevent slavery and human trafficking
- what employees can do to identify and mention certain slavery or human trafficking issues within the Gardner,
- what and where external help can be found

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**Our effectiveness in eliminating modern slavery**

- Guidelines for Checking Recruitment Agencies,
- Gardner Supplier Anti-Slavery & Human Trafficking Declaration
- Supplier Questionnaire
- Supplier Risk Assessment

Gardner will raise awareness with its employees around The Modern slavery act and issue periodic reminders.

**Approval for this statement**

This statement was approved by the Gardner Aerospace Holding Limited, and its subsidiaries, Board of Directors on 15<sup>th</sup> March 2019.

Name (Director)

**Dominic Cartwright**

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Signature



*D. Cartwright*

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