

## ***Midland Anti-Slavery Statement***

The statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015, and sets down Midland Aerospace limited commitment to preventing slavery and human trafficking within our business activities. We have put steps in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. employees are expected to report their concerns and management to act upon them.

### **Statement from our Managing Director**

Slavery and human right trafficking are abhorrent practices that have no place in our global society. Midland strongly opposes any such abuses that cause loss of a person's fundamental rights and liberties. We all have a collective responsibility to be alert to these practices no matter how small. Midland actively work with our employees and our supply chain is free of such practices.

### **Organisational structure and supply chains**

This statement covers the business activities of Midland Aerospace Limited which are as follows:

Midland Aerospace is a specialist manufacture of aerospace components and assemblies for a variety of applications. Midland continuously seeks new and progressive ways to adapt our product to meet the demands of modern manufacturing. Our products are supplied on a worldwide basis and we operate out of the United Kingdom. Our products are used many of the major aerospace manufacturers including Airbus, GE Aviation, BAE Systems and GKN Aerospace. The company's website is [www.midlandaerospace.com](http://www.midlandaerospace.com).

Midland Aerospace is part of the Calder Group and forms and integral part of the precision engineering arm. The Calder Group is a pan-European engineering group, active in specialist engineering, lead engineering and the manufacture and distribution of lead sheets. Calder supplies a world-wide customer base in aerospace, construction, healthcare, nuclear power, oil and gas and other markets.

The aerospace supply chain is a very complex and highly regulated compared to other industries. There are often multiple suppliers between the aircraft maker and the source of raw materials that enter the manufacturing process.

The vast applications within the aerospace supply chain make it challenging to effectively manage business and sustainability issues. Our key supply chains involve manufacture and purchasing of raw metal alloy in the form of mainly billets but component parts e.g. nuts, bolts and rivets. We source our materials mainly from USA, UK, France, Germany and Holland. We report on our supply chains via our internal and external audits process. This is a comprehensive auditable assessment required by the aerospace sector which allow external

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and internal sources to audit and ensure compliance to regulations and requirements.

Respecting human rights and environmental issues in the supply chain is ultimately our supplier's responsibility. Our role is to ensure development of practices that are aligned Midlands own expectations and values and this is clearly communicated and understood by our suppliers.

### **Policies relating to slavery and human trafficking**

Our business ethics and standards reflect our commitment to ensuring we have effective procedures and control to minimise the risk of human trafficking and other modern-day slavery practices infiltrating or supply chain or operating practices. Midland Aerospace is committed to acting with integrity and ethically in all of our business activities and relationships.

We are also committed to working with our supply chain to be aware of our business ethics and standards and ensure that our suppliers adhere to our values and standards.

All of our policies have been developed in partnership with our management and employees across all our Corporate locations.

### **Risk Assessment**

Midland carry out supplier audits along with supplier self-assessments prior to engaging any new supplier. Our supply chain is audited and monitored by our Quality Team, Purchasing Team and Finance Team both locally and internationally. We are bound by all aerospace quality standards AS9100, AS91110, ESAS to name a few, all require annual audits.

Based upon these processes we have identified the following activities to be at highest risk of infiltration in relation to slavery and human trafficking:

Buying billets on the open marketing and purchasing scrap metal if provenance cannot be verified. We currently issue our purchase order in line with our business ethics and values. We ensure that we outline our expectations clearly, concisely and complete regular reviews with our current suppliers on a regular basis.

Midland constantly review our supplier operations to ensure that the risk of non-compliance to our anti-slavery and human trafficking is reduced and create an annual risk portfolio.

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### **Due Diligence**

Midland require all our suppliers to complete an annual compliance check which is maintained by our Purchasing Teams. We will ask questions about business conduct, environmental management and labor practices included discrimination, child and forced labor, freedom of association, remuneration, working hours and health and safety.

Midland Aerospace will invoke sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

### **Staff Training**

We provide training to our employee to ensure that they are aware and understand the risk of modern day slavery and human trafficking infiltrating our business or supply chain.

This is to ensure that our employees can effectively operate to our business policies and procedures and aimed at mitigating this risk.

Midland have made specific provision for the protection of those who whistle-blow in relation to issues of modern slavery in our whistleblowing policy.

### **Revision**

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Mr. Eamon Lyons

Position: Managing Director

Date: 17/10/2017

Signature:

