MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

This Modern Slavery and Human Trafficking Statement is issued pursuant to Section 54(1), Part 6 of the Modern Slavery Act 2015 ("Act") and relates to actions and activities for the financial year ending 31 December 2022.

AerFin Limited (the “Company”, “we”, “us” or “our”) has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in all of its business dealings and relationships.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Act.

2. Organisational Structure

The Company has business operations in the UK and is therefore subject to the provisions of the Act.

We operate in the commercial aviation sector supplying aircraft spare parts and repair management services to airlines and other third parties based around the globe.

Our supply chain includes suppliers of aircraft components, component maintenance services (including aircraft and engine disassembly services), packing material and equipment, office and promotional supplies and cleaning and maintenance of our offices and warehouses. Suppliers are based globally and we are committed to ensuring that any supplier used by the Company complies with the Act, and our approved supplier process.

3. Due Diligence

We acknowledge that the biggest exposure to modern slavery and human trafficking is most likely to occur in our supply chain. As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chain, we have adopted the following due diligence procedures:

- Internal supplier approval and audit processes; and
- The addition of contractual obligations in supplier contracts which include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our due diligence procedures aim to:
- Identify and action potential risks in our business and supply chain;
- Monitor potential risks in our business and supply chain; and
- Reduce the risk of slavery and human trafficking occurring in our business and supply chain.

Other relevant policies include our Whistleblowing Policy and our Code of Conduct.

4. Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its supply chain using the due diligence procedures outlined above.

We do not consider that we operate in a high risk environment because the business operates in a highly regulated industry with suppliers predominantly located in lower risk jurisdictions (mainly the UK, the EU and the USA). Regular supplier audits are undertaken by the Company in any event.

We do not tolerate slavery and human trafficking in our supply chain. Where there is evidence of failure to comply with our procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

5. Next Steps

During the next twelve (12) months, we will continue to raise awareness of modern slavery and human trafficking by ensuring that our employees are aware, understand and reject modern slavery and human trafficking. This will be done by rolling out formal training to employees on this matter and by reiterating the Company’s commitment to reducing the risk of modern slavery and human trafficking within our industry and our business specifically.

If you have any queries in relation to our Modern Slavery and Human Trafficking Statement, please contact enquiries@aerfin.com or call our head office on +44 (0) 2920 109 890.

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Simon Goodson - CEO

Approved by the Board of Directors of the Company on 22nd June 2023.

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