



2021 STATEMENT ON MODERN SLAVERY

Ontic Engineering & Manufacturing UK Limited is a values-based organisation, dedicated to being the world's leading provider of aviation support and aftermarket services with the overarching objective to deliver exceptional, long-term, sustainable value for all our stakeholders. We are committed to improving our practices to combat slavery and human trafficking.

OUR BUSINESS AND SUPPLY CHAINS

Ontic is a leading provider of high-quality equipment and cost-effective solutions for the support of maturing and legacy aerospace platforms with locations in the USA, Europe and Asia.

Currently, Ontic and its affiliated companies operate at five locations on three continents with over 850 employees worldwide.

Each of our businesses has dedicated teams responsible for sourcing and managing supplier relationships for their respective business.

Our supply chain consists of:

- The businesses who provide products to Ontic; and
- The businesses who provide services to Ontic, for example utility providers, IT platform providers, cleaning companies and specialist consultants.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers.

OUR POLICIES

Ontic's commitment to ensuring that modern slavery and human trafficking is not taking place in our businesses or supply chains is embodied in our suite of ethical conduct policies. We recognise the importance of human rights and support the principles set forth in the UN Universal Declaration of Human Rights and we are committed to treating people according to merit and contribution, refraining from coercion and never deliberately causing harm to anyone.



OUR EFFORTS TO IDENTIFY MODERN SLAVERY IN OUR BUSINESSES AND SUPPLY CHAINS

Ontic conducts due diligence on each of our suppliers, contractors and service providers pursuant to our Third Party Vetting Policy and other standard vendor management reviews, which result in a detailed understanding of our business partners, their businesses and what products or services they provide to Ontic businesses.

As a supplier of products, we recognise that our biggest exposure to the risks of modern slavery and human trafficking concerns the suppliers further up our supply chain. We utilise our Third Party Vetting Policy to set out the guidelines and procedures that must be followed in assessing Ontic's business partners through due diligence. Depending on the relative risk identified as associated with a third party (determined using criteria such as country, proposed relationship etc.), we undertake standard or enhanced due diligence on all third parties, including suppliers, contractors and service providers. We also expect our business partners to adopt appropriate measures to combat modern slavery and human trafficking.

Regular due diligence checks are carried out on our existing business partners to ensure they still meet our standards.

THE EFFECTIVENESS OF OUR EFFORTS

To date, we believe Ontic has been highly effective in preventing modern slavery and human trafficking from existing in our businesses and in avoiding undesirable business partners.

It is clear to our business partners that our expectations encompass not only their businesses but their supply chains as well. Given that Ontic has maintained, in general, long term relationships with key suppliers, contractors and consultants and our expectations for ethical business practices have been a constant throughout those relationships, we expect full cooperation from our supply chains if the results of our assessments determine that enhancements to our internal controls are desirable.

We use the following key performance indicators (KPIs) to measure how effective we have been (not every KPI is used in each location) to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Vetting procedures.** The number or percentage of suppliers and sub-contractors that have been vetted for ethical labour practices with any concerns investigated by the legal department.
- **Supplier screening.** The number and type of issues identified on screening suppliers and sub-contractors.
- **Whistleblowing.** The number of reported breaches in the past year.
- **Training.** The number or percentage of staff trained.
- **Remedial action.** The instances of remedial action being needed based on legal advice.



TRAINING

Group policies, standards and internal controls, together with our strong ethical culture and our focus on safety, underpin our approach to risk management. We are committed to being a responsible business and our leaders are responsible for embedding this into how we work.

ASSESSMENT OF EFFECTIVENESS IN PREVENTING MODERN SLAVERY

We understand that the risks around modern slavery will evolve over time and we will continue our approach to mitigating these in the year ahead.

Gareth Hall, CEO

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the board of directors of Ontic Engineering & Manufacturing UK Limited on 14th December 2020.

Ontic’s financial year end is 31st December. This statement covers the period from 1st January 2021 to 31st December 2021.

Version Control

Version	Status	Date	Author	Authorised by	Description of change
1.0	New policy	April 2021	MM		Update from original policy
Next review due December 2021					

This policy does not form part of any employee’s contract of employment and Ontic may amend it at any time.