

## Modern Slavery & Ethical Behaviour Policy Statement

Written by DUY NGUYEN	Signature 	Date 03 MAR 2022
Checked and Approved by 	Signature 	Date 07 MAR 2022
Checked and Approved by D. SPENKER	Signature 	Date 03 MAR 2022
Released by DUY NGUYEN Quality Use only	Signature 	Date 08 MAR 2022

## Revision Record

Issue	Details of Change	Written By	Date
1	Initial Release	David Spencer	04 Feb 2021
2	<i>Annual review. No changes required</i>	<i>Duy Nguyen</i>	<i>03 Mar 2022</i>

This annual statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sabeti Wain Aerospace Limited's (SWA's) modern slavery and human trafficking statement for the year ending December 2022.

Modern Slavery is a global issue and affects every country, sector and industry. SWA understands that multinational efforts are required to end all forms of slavery and our Senior Management Team ensures that the company has a zero-tolerance approach to modern slavery within our business operations and within our supply chain.

## Organisational Structure & Supply Chains

SWA is a global designer and manufacturer of aviation seat covers, foams and ancillary seat parts. Since 1983, SWA has established a globally recognised brand, with a reputation as one of the world's leading innovators in the global market for aircraft seating soft furnishings. We make over 80 ship sets of seat covers per month for more than 50 global clients. Our business has been founded on innovation, utilising significant management experience in aviation, airlines & engineering.

The majority of SWA supply chain is based in the UK and Europe, with some specific materials sourced from the USA. We continue to pursue our policy of best price and quality and scour the market accordingly to locate the most appropriate suppliers to suit our customer's needs. SWA understands that it is our corporate responsibility to continue to develop policies and procedures to manage the way we obtain goods & services to keep our supply chain robust and ensure that the people working in them are treated in accordance with the latest laws.

## Policies

SWA has Whistleblowing Policies so that all employees are encouraged to report any case of fraud, misconduct or wrongdoing by co-workers or any other functions within the company and raise any concerns that they may have about the way in which the business is run, including but not limited to: criminal offence, miscarriage of justice, risk to health & safety, damage to the environment and breach of any legal obligation. SWA promotes an open and honest relationship and communication between the company and our staff and hopes that most matters of concern can be resolved by early discussion.

Our openness to discussion of the above stated concerns also provide staff with a secure way of seeking advice about any modern slavery or human trafficking issues personally affecting them or their families.

SWA checks that all staff can demonstrate their eligibility to work in the UK. In addition, SWA requires all contractors to undergo an eligibility check before commencing work.

## Due Diligence

SWA recognises that our supply chain is fundamental to our ability to meet our customer and shareholder requirements therefore we aim to engage with our suppliers through long term agreements that secure partnership. Our intention is to ensure that our supply chain is aligned to our current and future needs by communicating our values, objectives, future demands and capacity requirements.

SWA are currently developing a Supplier Quality Operations Manual (SQOM). The document describes Supplier Code of Conduct requirements, including those related to compliance with laws and regulations, ethical standards, employment standards and material compliance.

SWA requires suppliers to employ all employees on a voluntary basis and not to use any prison, slave, bonded, forced or indentured labour, or engage in any forms of compulsory labour, or any other forms of slavery or human trafficking. We require our suppliers to comply with the Modern Slavery Act and flow down applicable requirements to their sub-tier suppliers to ensure that slavery and human trafficking is not taking place in any part of the supply chain. Suppliers shall inform SWA, and applicable government officials, of any credible information received from any source alleging an employee, subcontractor, subcontract employee, or agent has engaged in conduct that violates the Modern Slavery Act, along with the actions taken against said employee, subcontractor, subcontract employee or agent.

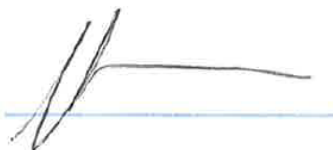
SWA ensures as well that anti-slavery requirements are included in our General Terms & Conditions of Purchase. We expect that our suppliers conduct business the same way we do: ethically and with respect to the law.

To monitor supplier's compliance with SWA requirements, we carry out due diligence and audits of our supply chain. We are incorporating corporate responsibility and code of conduct into the supplier auditing process. SWA reserves the right to conduct announced and unannounced on-site independent third-party audits of supplier's facilities, operations, books, and records and conduct confidential worker interviews in connection with such audits.

### Training

Modern Slavery awareness training is provided to relevant staff, where required.

Approved by the Board of Directors of SWA and signed on their behalf by:



Nick Wain  
Accountable Manager /  
Technical Service Director



Paymen Sabeti  
Operations Director



Mahnoush Sabeti-Wain  
Business Service Director

## Appendix A - Training Competence Checklist

Training Competence Checklist		
Enter Tasks Associated with this Document		Tick
I have read and understood this policy		
<i>If you are a manager signing as a trainee the relevant document owner will be responsible for the approval. If you are the manager and the document owner, strike through the approval box and sign the trainee box only.</i>		
Name (Trainee)	Signed:	Date (DD MMM YYYY)
Name (Manager)	Signed:	Date (DD MMM YYYY)

To be completed in accordance with the requirements of SWA-SOP-17

Training Effectiveness and Evaluation		Y/N
Do you remember what you learned during the training?		
Has the training been effective in meeting its objective?		
Do you feel confident in being able to apply the learning from the training into your workplace?		
Do you have a good understanding of the subject?		
Do you require any further follow-up training?		
Trainee Notes / Comments:		
Trainer's assessment method:		
Name (Trainer)	Signed:	Date (DD MMM YYYY)
Trainer Notes / Comments:		