

## **BBA AVIATION'S MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR ENDING 31<sup>ST</sup> DECEMBER 2016**

BBA Aviation plc provides global aviation support and aftermarket services through our network of on-airport fixed based operations, our engine repair and overhaul facilities and our service and support of legacy aerospace components.

### **Our Ethical Compliance Policies**

BBA Aviation's commitment to ensuring that modern slavery and human trafficking is not taking place in its businesses or supply chains is embodied in our suite of ethical conduct policies, including our Code of Business Ethics and the Ethics Implementation Policy. These policies are central to our values and set out our commitment to the highest level of ethical conduct in the way that we do business, including our relationships with employees, customers, suppliers and all of our stakeholders. We recognise the importance of human rights and the principles set forth in the UN Universal Declaration of Human Rights and are committed to treating people according to merit and contribution, refraining from coercion and never deliberately causing harm to anyone.

Our Disclosure of Unethical Conduct Policy requires our people to report any suspicions they may have of any unethical conduct, including any violations of law, any danger to the health and safety of an individual and any action that they consider inconsistent with BBA Aviation's values or policies. Such concerns or suspicions may be raised via internal channels or our ethics hotline, and can be on a named or anonymous basis. Matters raised are reported to the highest executive levels within BBA Aviation and we are committed to addressing any such concerns that are raised, will investigate accordingly and take appropriate action. Retaliation for reporting is strictly prohibited.

### **BBA Aviation's employment practices**

Our employees are core to what we do and BBA Aviation is committed to investing in and empowering our people and helping them to achieve a fulfilling career.

BBA Aviation promotes fair employment practices and fair and competitive wages, and prohibits harassment, bullying, discrimination, use of child or forced labor, or trafficking in persons for any purpose. These employment policies and practices are applied strictly throughout our businesses and it is the responsibility of all managers and supervisors to ensure that they are complied with. Our human resources and legal teams provide support, advice and training in order to achieve this.

### **Our Supply Chain management**

Our businesses each have dedicated sourcing and supply chain teams responsible for sourcing and managing our supplier relationships, and BBA Aviation has an established Procurement Council with representatives from across all of our businesses. One of the remits included in the Procurement Council's approved charter is advocating the enterprise wide compliance with all federal laws, regulations, and policies as well as BBA Corporate Policies and Procedures.

### **Our Due Diligence policies and processes**

The BBA Aviation Ethics Implementation Policy requires our businesses to carry out appropriate due diligence when engaging a new business partner, including on the appointment of new suppliers. Further, the BBA Aviation Third Party Vetting policy provides guidelines to our businesses regarding the conduct of due diligence before entering into an arrangement with a third party. Our due diligence processes are designed to ensure that we take all reasonable measures to conduct business only with ethical and responsible partners. Utilizing a risk-based approach, due diligence—and, in many cases, enhanced due diligence—is conducted on all business partners. To the extent

any evidence of modern slavery or human trafficking were uncovered during the due diligence process, that supplier would not be engaged. We also require our businesses to periodically repeat the vetting process and reassess their business relationships based on the updated results.

### **Supplier Adherence to our values and Ethics policies**

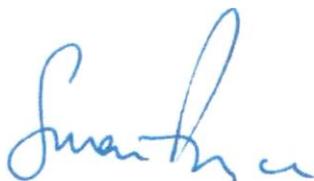
The Code of Business Ethics makes it obligatory that our suppliers undertake contractually to act consistently with the law and our Ethics policies. We will assess any instances of non-compliance on a case-by-case basis, but they may ultimately jeopardise a supplier's relationship with BBA Aviation.

In order to further emphasise BBA Aviation's commitment to managing and addressing unethical conduct within our supply chains, throughout 2016 we have been working with our businesses and the Procurement Council to develop a Supplier Code of Conduct which specifically addresses modern slavery and human trafficking, compliance with which will be mandatory for our suppliers. In addition to addressing the Modern Slavery Act the Code also addresses prohibitive behaviours, acts of bribery and corruption, fair employment, compliance of Import/Export requirements and human rights to name a few.

### **Training**

During the course of 2016 we conducted Ethics training for over 1,500 employees across the BBA Aviation group, which specifically addressed the requirement to assess the risk of human trafficking and modern slavery within our businesses and supply chains and highlighted the need for employees to be alert to these issues and to raise any concerns they may have in relation to this.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the BBA Aviation group's modern slavery statement for the financial year ending 31<sup>st</sup> December 2016 as approved by the Board on 28 February 2017. Signed on the Board's behalf by:



Simon Pryce

Group Chief Executive