

Aerospace Fastener's Modern Slavery & Conflict Mineral Statement

Statement Scope

Aerospace Fasteners LTD have taken careful consideration while constructing this Modern Slavery Statement Referencing material from informed and legitimate sources. Aerospace Fasteners have used and applied the guidelines set out from both the Modern Slavery Act 2015 & the UK Governments Guidelines.

Aerospace Fasteners Supply Chain and Structural Integrity

Aerospace Fasteners LTD are a stockist/distributor of: Aerospace standard fixings, fasteners and seals, Non-Standard and special components. Aerospace Fasteners are based in the United Kingdom and we deal with companies from a vast number of countries both within and outside of Europe. Aerospace Fasteners are a company that consists of less than 100 employees working and performing with high efficiency within the Aerospace & Automotive Industry.

With the nature of business, Aerospace Fasteners have many different suppliers and customers with no manufacturing tacking place within the company. Having such a vast amount of business associates, Aerospace Fasteners pride themselves on conforming to laws and regulations regarding a safe, adequate and law-abiding working environment, which is a practise that is understood and installed into every employee within Aerospace Fasteners who are then asked to complete a New Employee Induction Plan.

When dealing with our supply chain we use affiliated accreditations to determine whether the company is finically stable and have approvals to trade.

Business checks

When a new customer/supplier is set up to become a trade associate with Aerospace Fasteners we require the following details from them.

- VAT / Registration Number/Bank, References and Name of Directors: Aerospace Fasteners request this information for many different reasons. To associate Aerospace Fasteners with customer we must investigate the customer in questions. With this information, we use a government body called Companies House to check that the business is legitimate, financially stable and we can investigate business activity which would highlight breaches of laws and acts such as the Modern Slavery Act 2015.
- DUNS Number: This number allows us to investigate companies using the Dun & Bradstreet's data base which is the largest company database in the world. This data base allows us to understand if a business is reliable and legally viable. This would highlight illegal activity in which a business may operate such as Modern Slavery Act 2015 or the UK government guidelines.

<https://www.dnb.co.uk/about-us/company.html>

<https://www.gov.uk/government/organisations/companies-house>

Aerospace Accreditations

The Aerospace Industry is a vast network containing approvals and accreditations. One of the most commonly used and sort after accreditation is the AS9120A / ISO 9001:2008. Aerospace Fasteners are also audited by external entities, once we pass these audits we then become an approved supplier with that customer.

- ISO 9001 Certificate- This audit is conducted annually and involves an auditor becoming present at Aerospace Fastener's place of work. Although an ISO certificate checks our work processes to ensure we are performing at an efficient and effective level. We use this audit to state that our working environment is clean and tidy and we are abiding to laws and guidelines this is because our ISO certificate is accredited by UKAS (United Kingdom Accreditation Service) Which is a government body who assess the ethical capability of a business. As stated by UKAS below;

“Accreditation is the formal recognition that an organisation is competent to perform specific processes, activities, or tasks (which are detailed in a scope of accreditation) in a reliable credible and accurate manner. The provision of accreditation must:

- **be objective, transparent and effective;**
- **use highly professional competent assessors and technical experts in all relevant fields;**
- **use assessors (and subcontractors) that are reliable, ethical and competent in both accreditation processes and the relevant technical fields.”**

[\(https://www.ukas.com/about/about-accreditation/\)](https://www.ukas.com/about/about-accreditation/)

- Approved supplier- To become an approved supplier from a customer is a great accreditation for Aerospace Fasteners to hold. This states that companies are happy to work with Aerospace Fasteners over other companies. To become approved requires an audit from the customer. This involves a representative from said customer coming into our business and assessing our process.

The assessor would assess the working conditions and employee's competency, as well as general business processes. They will also assess who we work with an if we keep relative records of assessment with them (ISO Approved Accreditations).

Due Diligence

This is broken down into two tiers External and internal. Internally which means within the Aerospace Fasteners. The policies for this is set out in “New Employee Induction Plan” It is stated that should an employee feel threatened, miss treated or have safety concerns they should contact the Manager director or General manager so the issue can be addressed.

The external process is should an employee have concerns regarding customers or supplier working conditions or ethics they have the right and should voice their concern to the General Manger at the earliest opportunity who will then contact the corresponding authorities.

Conflict Minerals / Metal Compliance (3TG Minerals)

Aerospace Fasteners Ltd is committed to sourcing and supplying components to companies that share the same values as us when regarding human rights, ethics and environmental responsibility. We expect all the companies that we trade with to abide by the law and their own code of conduct which should prohibit the abuse of human rights and unethical practices.

Companies need to abide by strict laws and regulations when considering safety of life. Therefore, in August 2012 the U.S Securities and Exchange Commissions (SEC) published a final rule regarding conflict minerals under sections 1502 (The Dodd-Frank Wall Street Reform & Consumer Protection Act). This published document requires public traded companies to report annually the presence of any conflict minerals.

The term Conflict Minerals is regarding four minerals that slaves are forced to mine for within and countries adjoining to the Democratic Republic of Congo (DRC). The four minerals in questions are Tin, Tantalum, Tungsten and Gold (3TG). These four minerals are very well traded throughout a vast number of industries all over the world. As these items are always in such a high demand it is the belief that we can sustain the market from purchasing products from safe and legitimate sources. Unfortunately, not every person shares our belief regarding the abolishment of slavery, so the continuation of trade of these for items from the conflict zone (DRC) will be apparent but our belief falls in line with the stance of the published act that we can eradicate the illegal, slave trading of these parts by monitoring and establishing due diligence, when purchasing items that contain such minerals. We expect every supplier and customer to investigate the sources of which their products originally came from.

We can keep this monitored annually by completing questionnaires and surveys from our customers. We also request manufacturing documentation for all products, which allows us to maintain traceability, so we will be able to track originality. When employees at Aerospace Fasteners are purchasing a product that contain any 3TG they request a Conflict Mineral Statement from the supplier to ensure that we are trading in fair and ethical items.

Aerospace Fasteners understand, believes and acts towards making a better standard of living and environmental cleanliness. We also understand that this will be a process of many years of doing the correct monitoring and installing the correct attitude and understanding within both our company goals and our employees Code of Conduct.

Aerospace fasteners are willing to work closely with both our suppliers and vendors to create a cleaner Aerospace market. Please feel free to contact us at any point if you wish to discuss our values, behaviour and procedures regarding Conflict Minerals.

What do these regulations mean for Aerospace Fasteners?

Aerospace Fasteners have these policies and regulations in place firstly to ensure the safety and security of both their employees and customers. They also allow us to avoid and control the following breaches of the Modern Slavery Act 2015 and The UK guidelines as stated below:

- Engaging in all forms of forced labour and human trafficking
- Engaging with child labour
- The withholding of employee identification and corresponding documentation
- Eradicates the breach of commercial sex acts
- Allows fair terms for migrate workers
- Allows the standard of minimum wage to be applied
- Allows surveillance to keep suppliers/ Customers accredited. (Following investigation if needed)
- It allows freedom of speech and an officer to report to within the company

Should you have any questions or queries regarding Aerospace Fasteners Modern Slavery Statement, please feel free to contact us immediately as these are standards and policies that we as company hold in very high regards.

Many Thanks.

Yours Sincerely



Dean Gendall
General Manager



Nigel Willis
Quality manager

References:

http://www.antislaverycommissioner.co.uk/media/1063/ukpga_20150030_en.pdf

<https://www.ukas.com/about/about-accreditation/>

<https://www.gov.uk/government/organisations/companies-house>

<https://www.dnb.co.uk/>