



SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR NORDAM EUROPE LTD FOR THE YEAR ENDED 31 DECEMBER 2019

INTRODUCTION

The NORDAM Standard for Ethical Business Conduct is the foundation of our corporate culture, reinforcing our core values and guiding ethical decision-making. We are committed to improving our practices to combat slavery and human trafficking.

“Our position is, we’ll never compromise integrity... Let me put it this way: Never cross the line. And to remove all doubt, stay six feet behind the line.”

—Meredith Siegfried Madden, NORDAM CEO and Director NORDAM Europe Ltd

OUR ORGANISATION AND ITS STRUCTURE

NORDAM Europe Ltd is a provider of maintenance, repair and overhaul services to the commercial airline and air freight markets situated within the European, Middle Eastern, African and Asia Pacific regions.

The company is approved and regulated by, among others, European Aviation Safety Agency (EASA) and Federal Aviation Authority (FAA) to perform maintenance, repair and overhaul services to Thrust Reverser and Nacelle systems. Repairs are performed within the company’s location in Wales or in certain circumstances, on-site at customer’s aircraft location.

OUR ORGANISATION STRUCTURE

NORDAM Europe Ltd, a Wales and England private company limited by shares, is a Joint Venture company whose ultimate parent companies are:

The NORDAM Group, LLC one of the world’s largest privately held aerospace companies, headquartered in Tulsa, Oklahoma; and

The General Electric Company, the American multinational conglomerate corporation, headquartered in Boston, Massachusetts.

NORDAM Europe Ltd’s direct parent companies are NORDAM UK Limited and GE Aircraft Engine Services Limited.

OUR SUPPLY CHAINS

Being in the aerospace sector, the company’s supply chain is predominantly pre-manufactured aircraft components purchased from the OEM (original equipment manufacturer) or alternatively airworthy regulated and approved repair stations located in Europe, Singapore and the United States of America.



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NORDAM Europe Limited is registered in England Number 3279042 VAT Registration Number GB 642 2074 57





OUR POLICIES

NORDAM requires that all stakeholders behave ethically in all business transactions. To this end, NORDAM Europe Ltd applies the NORDAM Standard for Ethical Business Conduct. It is required that each NORDAM stakeholder be knowledgeable of and comply with this Standard. Likewise, we only do business with other companies that share this commitment to being the benchmark for ethical behaviour. NORDAM requires, as a condition of contract, that all suppliers commit to comply with applicable laws and regulations, including laws that prohibit Human Trafficking and Slavery. In addition, supplier contracts communicate NORDAM's expectations that NORDAM is committed to conducting its business fairly, impartially, and in an ethical and proper manner.

NORDAM leaders set the example by fostering a culture in which applicable statutes, regulations, internal policies and ethical business practices are at the core of all NORDAM business activities. Applicable policies which assist in combatting modern slavery and human trafficking include:

- Human Trafficking and Slavery Policy
- Equal Employment Opportunities
- Anti-Harassment Policies
- Environmental, Health and Safety Policy
- International Trade Policy
- Conflict Minerals Policy

All stakeholders and anyone working on our behalf must complete the NORDAM Standard for Ethical Business Conduct training, which emphasizes an individual commitment to business conduct that is beyond reproach. NORDAM further requires all suppliers and its own stakeholders to (a) read, (b) acknowledge that they understand and (c) will comply with NORDAM's Standard for Ethical Business Conduct.

In an effort to mitigate risks within the supply chains of products, NORDAM at least annually trains its management and non-management stakeholders who have a direct responsibility for supply chain management and quality on human trafficking and slavery. In general, the training includes training on NORDAM's Human Trafficking and Slavery Policy, awareness of warning signs, and how to identify and report potential violations.



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To facilitate an open and accountable culture, NORDAM encourages confidential reporting of any ethics or compliance-related concerns via a toll-free helpline, a web-based reporting system, or if the stakeholder prefers, by contacting the Ethics and Compliance Officer in person.

NORDAM Alert-line (<https://nordam.alertline.com>)

NORDAM Toll Free Help-lines:

USA	1-866-549-4983
Mexico	01-855-677-5809
Singapore	800-110-2072
United Kingdom	0808-234-6537

Proof of a violation isn't required – only the honest belief that a violation may have occurred – and while we won't tolerate retaliation against any stakeholder who reports possible misconduct in good faith, reporting stakeholders may remain anonymous. We investigate all reports to the extent that is reasonably possible.

NORDAM seeks to source its suppliers in a responsible manner and fully expects and requires its suppliers to operate compliance with all applicable laws. NORDAM Human Trafficking and Slavery Statement explicitly communicates that any violation would be a justifiable reason for supplier relationship termination. Compliance with the applicable laws forms the basis for supplier approval and is fundamental within our terms of business.

Given the environment within the aerospace sector, which undergoes regular audits by Government Airworthy authorities, customers and vendors as a basis for continued regulatory approved status, and our policies, NORDAM does not believe that there is a significant risk of Slavery and Human Trafficking within the supply chain.

SUMMARY OF SPECIFIC ACTIONS TAKEN DURING 2019

- New employees underwent photographic ID confirmation checks, eligibility to work in the UK and denied party screening checks. All employees received written employment contracts and have been provided with NORDAM Photographic ID cards to gain access to the site.
- New and existing employees were provided with the annual ethics and compliance training and certified compliance of the company's ethical standards and policies
- Management and non-management stakeholders who had a direct responsibility for supply chain management or supplier quality received additional training on NORDAM's Human Trafficking and Slavery Policy, including awareness of warning signs, and how to identify and report potential violations.
- New suppliers continue to be required to commit to comply with applicable laws and regulations, including laws that prohibit Human Trafficking and Slavery.



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- The company continued to maintain its open to all, 24/7 ethics and compliance-related hotline and alert system.
- Raised awareness of the Human Trafficking and Slavery Statement and the Modern Slavery Act by publishing the Human Trafficking and Slavery Statement on NORDAM's website.
- Reconfirmed company responsibility for the Human Trafficking and Slavery Statement by receiving unanimous Board approval of the 2018 Statement.

NORDAM takes very seriously human rights laws and we will continue to take measures to enhance our efforts to promote fair and ethical working conditions of our stakeholders and of our product suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes NORDAM Europe Ltd's Slavery and Human Trafficking Statement for the financial year ending 31 December 2019.

A handwritten signature in blue ink, appearing to read "THS", written over a horizontal line.

T. Hastings Siegfried, Director

Date: *JUNE 29, 2020*



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