

# **Modern Slavery and Human Trafficking Policy**

#### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

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We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BostonAir Group's slavery and human trafficking statement.

### **Organisational structure**

We are a provider of skilled manpower to the wind and aviation sectors, technical services for lifting equipment and technical online training in the aviation sector.

BostonAir Group has its head office in Beverley, East Yorkshire and is made up of;

- Bostonair Ltd
- Boston Energy Ltd
- Boston Renewables Ltd
- Bostonair Technical Training Ltd
- Bostonair GMBH

We operate in the UK and Europe

We have an annual turnover of £25m

#### Our supply chains

We provide services to many international and blue chip companies and our suppliers are mainly UK based; as a provider of predominantly skilled labour, our suppliers are minimal.

# Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery and Human Trafficking Policy which will be shared with our suppliers.

Our Modern Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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# Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk 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.

### Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. Agreements with existing suppliers will be reviewed to ensure compliance with anti-slavery measures and new suppliers will be asked to provide their Modern Slavery Policy or agree to abide by the BostonAir Group Policy

We have a dedicated SHEQ and compliance Manager, who relies on the support of the following departments:

- Finance
- Procurement
- Sales
- Operations

The responsible manager is Katie Monk.

# **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff.

Signed: Date: 14/07/17

Mark Parkes
Managing Director

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