

# Aeropeople Limited

## Modern Slavery Act Policy Statement

Aeropeople Limited (Aeropeople) is a wholly owned subsidiary of Marshall of Cambridge Aerospace Limited, a family owned business headquartered in Cambridge United Kingdom. Aeropeople is a leading dedicated Aerospace man-power and support services provider operating globally within a geographical footprint of offices in the United Kingdom, Germany and United Arab Emirates.

Aeropeople, as with all other companies in the Marshall of Cambridge (Holdings) Limited Group, adheres to the core values of:



Consistent with these values, Aeropeople has a zero-tolerance approach to modern slavery in our own business and throughout our supply chain and is committed to acting ethically and with integrity, in line with these values, in all business dealings and relationships. This policy applies to all employees, contractors, suppliers and customers and any other persons or organisations doing business with Aeropeople. Aeropeople complies with the employment laws of every country in which it operates and expects those with whom it does business with to do the same.

Aeropeople has not received any reports of instances of modern slavery over the past financial year but will continue to raise awareness of modern slavery and of the need for proper due diligence and risk assessment processes to be applied by all employees, contract workers, suppliers and customers, in accordance with its policy.

Aeropeople has implemented and enforced effective and proportionate systems and controls to provide reasonable assurance that modern slavery is not taking place anywhere in its own business or in any of its supply chains.

Aeropeople is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. There is an expectation of the same high standards from contractors, suppliers and other business partners, and as part of the Aeropeople contracting processes specific prohibitions are included against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

Our full policy on Modern Slavery can be seen here <http://marshallgroup.co.uk/wp-content/themes/marshall-group/assets/docs/slavery-human-trafficking.pdf>

In addition Aeropeople takes a zero-tolerance based approach to bribery and corruption and as such will not offer or accept bribes in any circumstances and will fully abide by UK anti-bribery legislation and the relevant legislation of any countries in which it is established, operates and trades. The full policy can be seen here <http://marshallgroup.co.uk/stakeholder-relations/code-business-ethics/>

Aeropeople acknowledges the risk within the industry and territories that it operates, however considers the risk of modern slavery to be low due to the nature of its supply chain and the responsibility it takes to combat modern slavery as demonstrated by this policy.

## **Aeropeople Business Process**

- Aeropeople considers it to be everyone's responsibility to prevent, detect and report any instances of modern slavery in any element of its business, including customers and supply chains.
- At the start of a new relationship with another organisation, whether a customer or a supplier, Aeropeople will carry out due diligence activities to ensure that the organisation it intends to enter into a relationship with meets appropriate ethical and professional standards.

Whilst it is important to ensure that the standards are met at the beginning of a relationship, it is equally important to ensure that the same standards are maintained.

Aeropeople will risk assess and determine on a case by case basis the due diligence checks required for each new business relationship, such due diligence includes:

- Ethical Standards
- Independent References
- Sustainability
- Financial Stability

Information is obtained from reputable business information services enabling checks as to whether partners, customers, and suppliers and their key personnel are subject to any sanctions or on any law enforcement databases anywhere in the world as well as any negative media coverage.

Where partners, customers and prospective suppliers are in high risk industries, located in high risk countries or if initial checks indicate cause for concern Aeropeople utilises third party services to investigate a company or individual in more depth.

- Aeropeople has a clause on Modern Slavery in all new customer and supplier contracts. This clause will also be inserted into existing contracts, as and when they are renewed.

The contract clause requires all of our partners to:

- Comply fully with all applicable International Conventions on Forced Labour and Trafficking.

- Comply fully with all legislation applicable in the jurisdictions in which the contract is being performed.
  - Notify Aeropeople of any breach of forced labour law by the company, or its employees.
  - Flow down similar provisions to its supply chains.
- Marshall Group has delivered Modern Slavery awareness training to all personnel responsible for relationships with external organisations.

Further training will be carried out during 2017 and awareness of Modern Slavery will be included within the induction process for all new employees as mandated by the Marshall Group policy on Modern Slavery.