

**MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 31.12.2021 ISSUED
PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015**

Our business, structure and supply chains

Gardner Group Limited ["the Group"] is an international manufacturer of aerospace finished components, comprising of simple to highly complex and small to very large machined and sheet metal fabricated detailed parts, with substantial speed shop, assembly and kitting capabilities. We employ approximately 1500 people.

The Group operates through subsidiary companies in UK, Poland, India, France, soon to be China and have a representative office in USA. Our main purchasers are materials for aluminium parts, chemicals, standard parts for assembly and tools that have been purchased from European / US manufacturers

This statement is made according to s.54 of the Modern Slavery Act 2015 and sets out the steps that Gardner Group Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not occurring within our business or supply chain. There is no tolerance for modern slavery in our company. We act loyally, ethically and with integrity in all business activities. We put effective systems and controls in place to protect against any type of modern slavery occurring within the business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our policies

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.

<https://gardner-aerospace.com/about-us/corporate-responsibility/>

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.

Relevant policies adopted by the organisation to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in our operations.

- Sourcing Manual
- Occupational Health, Safety & Environmental Manual

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- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- CSR Policy
- Recruitment & Selection Policy
- Anti-Harassment & Bullying Policy

Due diligence processes

Due diligence is undertaken by the Group including when taking on new suppliers and when reviewing its existing suppliers.

The Supplier Selection process within the Gardner Aerospace supply chain shall:

- Be clear and concise with logical steps
- Review Risk management
- Be transparent in terms identifying the Supplier Selection and task within the process
- Provide a clear indication of the activities required
- The process for escalating issues and concerns within the relevant site
- Identify tools to be used during the process.

Steps to assess and manage risks

Given the nature of our suppliers, we consider the risk of slavery or human trafficking within our supply chain is low.

The Group risk assessment considers working with recruitment agencies to be a higher risk area due to the potential for the Workers charged illegal recruitment fees, workers uninformed or misinformed about terms of employment, workers not provided with understandable, legally compliant written contracts, fraudulently charging fees for travel, health checks or work documentation, false Right To Work in the UK documentation

Key suppliers to Gardner are risk assessed and scored across a number of different areas. Suppliers must comply with the Modern Slavery Act 2015 and have a Human trafficking policy in place – this is a binary requirement and failure to comply will result in the supplier not being approved for use.

In addition to this, Gardner Aerospace Terms & Conditions of Purchase specifically mandate that the supplier must comply with the Modern Slavery Act 2015.

Training

All senior managers, supply chain and HR staff will have to complete training on modern slavery.

The Group training will cover:

- principles of the Modern Slavery Act 2015

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- how employers can identify and prevent slavery and human trafficking
- what employees can do to identify and mention certain slavery or human trafficking issues within the Group,
- what and where external help can be found

Our effectiveness in eliminating modern slavery

- Guidelines for Checking Recruitment Agencies,
- Gardner Supplier Anti-Slavery & Human Trafficking Declaration
- Supplier Questionnaire
- Supplier Risk Assessment

The Group will raise awareness of modern slavery within emails send across the Group's employees. Reminders will be sent periodically.

Approval for this statement

This statement was approved by the Gardner Group Limited Board of Directors on 11th January 2022
Name (Interim CEO)

Antony Upton

Signature



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Gardner Aerospace | Victory Park | Victory Road | Derby | DE24 8ZF | UK

T: +44 (0) 1332 274 700 | F: +44 (0) 1332 274 701