MODERN SLAVERY STATEMENT

Key Belief:

As a leader in the aerospace manufacturing industry, MB Aerospace (also referred to as the “Company”) recognizes its role and responsibility in adopting a robust approach to preventing slavery and human trafficking.

Introduction:

As a world class manufacturer of complex aero-engine components to the Aerospace and Defense markets, MB Aerospace is committed to the highest standards of ethical conduct and to complying with all applicable laws, including but not limited to FAR Subpart 22.17 Combating Trafficking in Persons and Section 54, Part 6 of the Modern Slavery Act 2015.

This statement sets out the Company’s commitment to address issues of slavery and human trafficking within its supply chains or in any part of MB Aerospace’s business.

Supply Chain:

MB Aerospace is committed to working collaboratively with our supply chain and customers to conduct our business ethically and in compliance with applicable law.

MB Aerospace requires our employees and suppliers to abide by all applicable laws, both in the US and abroad. This includes laws in regard to human trafficking and slavery.

In our standard production procurement process, MB Aerospace issues purchase orders that incorporate our Standard Terms and Conditions (T&Cs). MB Aerospace’s T&Cs require that all suppliers of MB Aerospace adopt and comply with a policy statement or code of conduct regarding business ethics (“Code”). The Code must be suitable for Supplier’s business and as a minimum, must require compliance with all applicable laws and regulations. The Code must also prohibit the use of child or forced/slave labor. More specifically, all suppliers are required to, at all times, comply with the Modern Slavery Act of 2015 (UK) and are expressly prohibited from using any form of forced, bonded, compulsory labour, slavery or human trafficking.

MB Aerospace is currently developing a program to verify or audit our supply base and/or require specific certifications that materials the Company purchases do not involve human trafficking and slavery. Notwithstanding, MB Aerospace’s suppliers are obligated to comply with laws, and also are expected to operate their businesses ethically and fairly. Failure to do so, including violation(s) of law regarding human trafficking and slavery, would constitute a breach
of the supplier’s commitments and obligations under the terms of our contracts and would serve as grounds for MB Aerospace to take corrective actions.

MB Aerospace further acknowledges that we have the responsibility to report trafficking in persons violations by the our employees and to provide employee protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, from reprisal for whistleblowing on trafficking in persons violations.

Finally, MB Aerospace has instituted Codes of Conduct in each jurisdiction to which it maintains a trading unit that commit MB Aerospace employees to (i) operate and engage in business activities that represent the highest degree of ethics and integrity and (ii) report any instances of non-conformance with this guiding principle.

Signed this 21st day of May, 2017

Craig Gallagher  
MB Aerospace  
Chief Executive Officer

Gregor Goodwin  
MB Aerospace  
Chief Financial Officer

William Kircher  
MB Aerospace  
Chief Operating Officer