

Weston Aerospace Ltd

Slavery and Human Trafficking Statement

Weston Aerospace Ltd is committed to supporting fundamental human rights and believes in the dignity and worth of all individuals. We do not use or allow the use of slave or forced labour or human trafficking in our business activities and expect our suppliers and business partners to adhere to these same principles. We condemn any degrading treatment of individuals.

This statement is made pursuant to Section 54 of the United Kingdom's Modern Slavery Act of 2015 and details the steps Weston Aerospace Ltd has taken to ensure that slavery and human trafficking is not taking place in our business and supply chains. It constitutes our slavery and human trafficking statement for the fiscal year ending on 30th September 2020. We will review, update, and publish this statement annually.

As of 14th March 2019, Weston is a wholly owned subsidiary of TransDigm Group Inc., a \$4 billion turnover US public company, which operates in the Aerospace and Defence market.

Organisational Structure and Supply Chains

Weston Aerospace Ltd, part of the Auxitrol Weston brand name is a world leading supplier of engine and aircraft sensors to both original equipment manufacturers and aftermarket MRO shops and airlines. We provide a wide range of highly reliable sensors including high accuracy temperature, speed and pressure sensors. Our history dates back more than sixty years with a proven track record in supplying into the commercial, military, aero derivative and industrial markets. The Auxitrol Weston team provides a high added value service to our customers that starts with our design and development and carries through to production. Our service also includes our worldwide aftersales and maintenance facilities in Europe, the United States, China and Singapore. We have manufacturing facilities in the UK and Mexico. We have approximately 250 employees located in the UK. We work with over 200 vendors from countries around the world to source both raw materials and components to fabricate and assemble our products. We have long-term contracts with most of our key suppliers given the highly regulated nature of the industries in which we operate. As a contractor and subcontractor to the US government, we are subject to various laws and regulations that are more restrictive than those applicable to private sector businesses. The long term nature of our customer relationships is reflected in our supplier base, which is also stable over time.

Organisational Policies

We have a global Code of Business Conduct and Ethics and Whistle-blower Policy that can be found at: <https://transdigmgroupinc.gcs-web.com/corporate-governance>

The Code of Business Conduct and Ethics communicates our human rights standards, including freedom from forced labour and human trafficking. This code applies to everyone in Weston Aerospace Ltd at all levels and in all countries where we do business. Employees are required to sign a Code of Conduct Certification annually to demonstrate their commitment and compliance with this Code. This code is further supported by a specific corporate policy on human rights.

We have a Combating Trafficking in Persons Policy, which can be found at in the quality management system, which prohibits Weston, our employees, agents, subcontractors and subcontractor employees from engaging in activities that are known enablers of human trafficking as identified in Federal Acquisition Regulation (FAR) 52.222-50 - Combating Trafficking in Persons. These activities include charging recruitment fees, withholding employee identity or immigration documents and using misleading or fraudulent practices during the recruitment of employees, as well as providing arranged housing that fails to meet host country housing and safety standards. This Policy was published in August 2018 and is now being implemented across all subject business units.

Weston Aerospace Ltd.

124, Victoria Road, Farnborough, Hampshire, GU14 7PW, United Kingdom

Tel: +44 (0)1252 544433 - www.auxitrolweston.com

Weston Aerospace Ltd. Registered office: 5 New Street Square, London, EC4A 3TW.UK - Registered in UK - No 04740406 - VAT number 811 2795 42

All Weston Aerospace Ltd supervisors, managers, and executives are required to read and adhere to our Policy and related procedures. We are committed to updating our business conduct and ethics policies periodically to include lessons learned and reflect new insights into improving our effectiveness in the fight against slavery and human trafficking.

We also have a Supplier Code of Conduct (Code) that applies to all Weston Aerospace Ltd suppliers, subcontractors and service providers and to all supplier facilities performing work for Weston Aerospace Ltd. Weston Aerospace's suppliers are subject to periodic supplier quality audits whereby they are expected to comply with our code of conducts and terms and conditions. We expect our suppliers to adhere to our human rights standards, including our Policy regarding slavery and human trafficking, and to have management systems in place to support compliance with the Code. The Code expects our suppliers to have documented ethics and compliance policies, to implement their own code of conduct, and to flow down the principles of their code to their own supply chain.

Due Diligence and Assessing and Managing Risk

Weston Aerospace Ltd assessed our supply chain for risk of human rights abuse throughout our global operations after launching our human rights program in October 2017. The risk assessment process takes into consideration country and sector risks and will recur annually. As we identify risks in our supply chain associated with specific facilities, we will develop mitigation plans to help ensure these facilities are meeting our human rights standards. The results of the assessment will inform any further company-wide training and support needs.

Weston Aerospace Ltd is working with a third-party provider, Assent Compliance, to help us address risks of modern slavery and human trafficking, especially throughout our global supply chain. We are using a modified version of the Slavery and Trafficking Risk Template (STRT)2 to survey our suppliers to assess the risk of slavery and human trafficking. This risk screening approach directly engages suppliers and, as such, fosters constructive dialogue and further raises supplier awareness of our expectations with regards to protecting workers from slavery and human trafficking. It also collects data in a standardised, efficient manner flowing down and gathering information through deep supply chains.

We are currently evaluating our exposure to slavery and human trafficking risk based on the responses received and intend to develop a strategy to work with suppliers that have an elevated risk. We are committed to working with our suppliers to address identified risks. Weston Aerospace Ltd also detects risks through its Ethics Helpline and is open to company employees, suppliers' employees, and contractors to report suspected violations of Weston Aerospace Ltd policies, including its Policy and Code. A link to the Helpline is available at <https://app.convercent.com/en-us/LandingPage/4b13043f-c9f4-e411-8122-00155d621509>. All reports are treated as confidential, whether provided through telephone or website, and reporters may remain anonymous where permitted by law. Weston Aerospace Ltd is committed to fostering an environment where people feel free to raise issues, including issues regarding slavery and human trafficking, and we will investigate as appropriate to the issue raised. We will not tolerate disrespectful behaviour or other forms of retaliation aimed at an individual who makes an ethics report in good faith or provides truthful information in an investigation.

Key Performance Indicators

After completing its initial supply chain risk screening process in fiscal year 2017, Weston Aerospace Ltd has established and is monitoring key performance indicators to measure progress in reducing its risks of modern slavery and human trafficking. These KPI's include the percentage of our suppliers evaluated by Assent, the number of issues related to human trafficking identified, and the percentage of management training completed during the year. We will know the effectiveness of our approach if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

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Training

Weston Aerospace Ltd employees at subject manufacturing facilities are required to complete the Weston Aerospace Ltd Combating Trafficking in Persons General Awareness Training every three years, in addition to annual refresher training during the interim years. In fiscal year 2018, we rolled out awareness training for management and procurement staff specific to slavery and human trafficking to further supplement the training that we already provide our employees.

The Senior Leadership team of Weston Aerospace Ltd recognises the importance of the provisions of the Modern Slavery Act 2015 and the Directors aim to ensure that slavery and human trafficking have no part in the company's operations and supply chain. Weston has always been vigilant about employee welfare and aims to be transparent in its practices. We welcome the opportunity to state our firm commitment to a zero tolerance approach to modern slavery and human trafficking.

Approval

This statement was approved on behalf of Weston Aerospace Ltd by the undersigned on 8th January 2020.

Gareth MOORE
Site Director

Thierry MOTTIN
Global Trade Compliance Sr. Manager

The Slavery and Trafficking Risk Template (STRT) is an industry standard open-source template available at www.sraglobal.org

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