

# Modern Slavery & Human Trafficking Policy Statement



## Introduction

This updated statement, post our Financial year ending 31st December 2018, is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Airswift has put in place in order to ensure that modern slavery or human trafficking is not taking place within our business or global supply chain.

For over 35 years Airswift has been transforming lives through the provision of international workforce solutions to the energy, process and infrastructure industries. Our core values are what support our vision, shape our culture and reflect what our company values. They are the essence of our company identity and embedded in everything we do:

- Safe
- Innovative
- Excellence
- Passionate
- Transparent
- Integrity

Accordingly, as Chief Executive Officer I wish to make it clear that I will not tolerate corrupt actions either by those who are employed by Airswift or those who act on our behalf or with whom we deal. All those who work in Airswift are, without any distinction or exception whatsoever, committed to respecting these principles in performing their roles and responsibilities and to making sure that others respect them.

## Organisational Structure & Supply Chain

Airswift Holdings Limited is a private limited company headquartered in the UK and is an international workforce solutions provider within the energy, process and infrastructure industries with over 600 employees worldwide. Airswift Holdings Limited is the parent company for the following UK companies for which this statement also applies:

- Air Energi Group Holdings Limited
- Air Energi Group Holdings Limited
- Air Resources Limited
- Swift Engineering (Azerbaijan) Limited
- Swift Technical (Europe) Limited

Airswift is driven by three corporate hubs in Houston, Manchester and Singapore supporting 60 regional offices and we take seriously the fact that we could potentially be perceived as an easy target for the illegal movement of forced labour with our global reach, and we are committed to ensuring that Airswift does not engage in nor can it be seen to engage in any form of forced labour, modern slavery or human trafficking.

With a worldwide presence Airswift is aware of the importance of managing the supply chain. We therefore have in place a list of approved suppliers that can be used across the global business, this ensures that we maintain consistency in our supply chain and safeguards our ethical practices.

## Our Policies

We have in place a number of internal policies to ensure that we are conducting business in an ethical and transparent manner, these include:

Modern Slavery & Human Trafficking Procedure  
Anti-Bribery & Anti-Corruption Policy  
Confidential Reporting Procedure  
Code of Business Ethics

## Due Diligence Procedures

We conduct due diligence on all 3rd Party suppliers before allowing them to become an approved supplier. Airswift is aware of the importance of ongoing assessment of the supply chain, and therefore performs annual reviews of approved suppliers, which considers their provision and risk ratings to observe if any changes have occurred.

Before placing any candidates Airswift always carries out background checks to ensure that the candidate has the right to work in the relevant location. Airswift also conducts monthly Contractor Satisfaction Surveys for new contractors, those celebrating annual employment anniversaries, and those who have recently finished their assignments. These surveys provide individuals with the opportunity to give open, honest, and confidential feedback on their experiences during their assignments.

## Identifying, assessing and managing risk

Due diligence on 3rd Party Suppliers is assessed by the Group Finance Director and/or the Group Operations Director in order to identify any potential slavery and human trafficking. Furthermore, the Airswift Client Services Managers hold regular formal meetings on the client work site both with the client and the contractors, in order to assess work conditions. In locations where there is an in-country office, contractors are encouraged to attend the office to speak with the Service Team regarding any issues that may occur during their assignment. This is in addition to the monthly Contractor Satisfaction Surveys.

## Key Performance Indicators

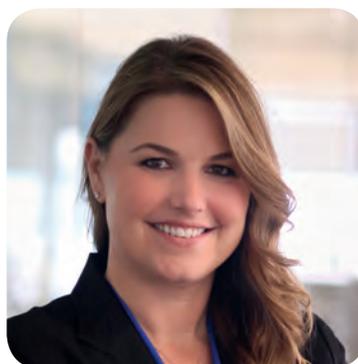
The effectiveness of the steps that Airswift has taken to ensure that any form of forced labour, modern slavery or human trafficking is not occurring within our organisation or global supply chain in 2018 can be assessed by:

- All new employees completing training on Airswift Policies and existing employees completing refresher training in 2018
- No reports being received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified
- Supplier audits not identifying any supply chain link to any form of slavery.

## Training

Communication of policies and procedures is facilitated by either email, briefings, presentations, classroom training, or online training via the Airswift Learning Management System (LMS). The type of training given is dependent upon the scale and detail of the information to be communicated. Details of training or briefings delivered to employees is held on HR files and/or training registers.

Ethics and business conduct are considered to be core training modules and all employees are required to take these LMS training course as part of their induction process and on an annual basis during their employment with Airswift.



Janette Marx

Chief Executive Officer



[airswift.com](http://airswift.com)

Airswift Holdings Ltd.  
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