COMPLIANCE TO MODERN SLAVERY ACT 2015 – TRANSPARENCY IN WESCO AIRCRAFT EMEA SUPPLY CHAIN

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. This statement is made on behalf of Wesco Aircraft EMEA, Ltd. (“Wesco”) for the financial year ending 30 September 2019.

In 2015 the UK Government passed the Modern Slavery Act as part of a wider effort to combat Human Rights abuses across the globe. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Wesco has a zero-tolerance approach to any form of modern slavery. Wesco is committed to acting ethically in all our business dealings and relationships, and establishing effective systems and controls to safeguard against any form of modern slavery in our supply chain.

Our Business
Wesco is the world’s leading independent distributor and provider of comprehensive supply chain management services to the global aerospace industry, based on annual sales. Its services range from traditional distribution to the management of supplier relationships, quality assurance, kitting, just-in-time delivery and point-of-use inventory management.

Our Supply Chains
We continue to monitor risk across our supply chain and the overall risk of slavery within our supply chain remains low. The factors we include in our ongoing risk analysis are the geographical location of the supplier and their extended supply chains, the type of product provided and whether or not they are an aerospace Original Equipment Manufacturer (“OEM”) or a distributor.

The aerospace industry is highly regulated with high entry barriers and material traceability. Wesco’s policy is to only purchase directly from OEMs and their authorised distributors. The majority of our suppliers are based in the United States and Western Europe. We do not use brokers or intermediaries without the express permission of the Director of Quality EMEA & APAC. Further, all suppliers are subjected to an approval process by our Supplier Quality Team prior to the placing of any Purchase Order. Suppliers’ approvals are reviewed at regular intervals.

Our Policies
We have a comprehensive ethics and labour policy which specifically prohibits the use of forced, bonded or indentured labour and regulates the use of agents and the payment of employers’ recruitment fees.
Due Diligence
Our risk assessment is an ongoing process and should we identify a supplier where there is a higher risk, we will conduct on site audits.

Supplier Adherence
As part of our contracting processes, we will continue to include specific prohibitions against the use of forced, compulsory or trafficked labour, or of anyone held in slavery or servitude within our standard terms and conditions. We expect that our suppliers will hold their own suppliers to the same high standards and will report any suspicions to Wesco for investigation.

This statement has been signed by Jan Dobrucki, on behalf of the Board of Directors.