

## ACRO Modern Slavery Act Statement

### Fly in the Future

Ref. HR-POL-643



## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Acro Aircraft Seating Ltd's modern slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2021

Modern Slavery is a global issue and affects every country, sector and industry. Acro understands that multinational efforts are required to end all forms of slavery and our Executive Leadership Team ensures that the company has a zero-tolerance approach to modern slavery within our business operations and within our supply chain.

All of the policies and codes referenced within this statement are included in our companywide Business Management System. This statement is available as well on our Acro website [www.acro.aero](http://www.acro.aero)

## Organisational structure and supply chains

Acro is a global designer and manufacturer of airline passenger seats. Since 2007, Acro has established an award-winning brand, with a reputation as one of the world's leading innovators in the global market for economy aircraft seats. Over the past 14 years Acro have designed, certified and manufactured more than 100,000 seats. We make over 3,000 seats a month for more than 20 global clients. Our business has been founded on innovation, utilising significant management experience in aviation, airlines and engineering.

The majority of Acro supply chain is based in the UK and Europe. During the last financial year, we have started doing business with China. Acro understands that it is our corporate responsibility to continue to develop policies and procedures to manage the way we obtain goods and services to keep our supply chains robust.

## Policies

Acro has Grievance (HR-POL-370) and Whistleblowing (HR-POL-204) Policies so that all employees are encouraged to report any cases of fraud, misconduct or wrongdoing by co-workers or any other functions within the company and raise any concerns that they may have about the way in which the business is run, including but not limited to: criminal offence, miscarriage of justice, risk to health and safety, damage to the environment and breach of any other legal obligation. Acro promotes an open and honest relationship and communication between the company and our staff and hopes that most matters of concern can be resolved by early discussion.

Our Employee Assistance Programme also provides staff with a secure way of seeking advice about any modern slavery or human trafficking issues personally affecting them or their families.

Acro checks that staff can demonstrate their eligibility to work in the UK. In addition, Acro uses a preferred supplier list to source temporary workers and requires all contractors and agency staff to undergo an eligibility check before commencing work.

## Due Diligence

Acro recognises that our supply chain is fundamental to our ability to meet our customer and shareholder requirements therefore we aim to engage with our suppliers through long term agreements that secure partnership. Our intention is to ensure that our supply chain is aligned to our current and future needs by communicating our values, objectives, future demands and capacity requirements.

During the previous financial year, Acro has established a Supplier Quality Manual (QA-MAN-422). The document describes Supplier Code of Conduct requirements, including those related to compliance with laws and regulations, ethical standards, employment standards and material compliance.

Aero requires suppliers to employ all employees on a voluntary basis and not to use any prison, slave, bonded, forced or indentured labour, or engage in any other forms of compulsory labour, or any other forms of slavery or human trafficking. We require our suppliers to comply with the Modern Slavery Act and flow down applicable requirements to their sub-tier suppliers to ensure that slavery and human trafficking is not taking place in any part of supply chain. Suppliers shall inform Aero, and applicable government officials, of any credible information received from any source alleging an employee, subcontractor, subcontractor employee, or agent has engaged in conduct that violates the Modern Slavery Act, along with the actions taken against said employee, subcontractor, subcontractor employee or agent.

Aero ensures as well that anti-slavery requirement is included in our General Terms and Conditions of Purchase (SC-REQ-226). We expect that our suppliers conduct business the same way we do: ethically and with respect to the law.

To monitor supplier's compliance with Aero requirements, we carry out due diligence and audits of our supply chain. We are introducing Corporate responsibility and code of conduct into the supplier auditing process. Aero reserve the right to conduct announced and unannounced on-site independent third-party audits of supplier's facilities, operations, books, and records and conduct confidential worker interviews in connection with such audits.

## Performance Indicators

Aero currently measures and reviews on a monthly basis performance indicator related to voluntary staff turnover. In due course we aim to use additional indicators to measure the effectiveness of modern slavery strategy, including percentage of staff that have attended training sessions (e-learning) on modern slavery and number of reported incidents of modern slavery.

## Training

Modern slavery awareness training is provided to all staff through our online learning system. This is provided upon joining the business and refreshers, as necessary.