

# **SPIRIT AEROSYSTEMS (EUROPE) LIMITED - ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

## **1: OPENING STATEMENT FROM SENIOR MANAGEMENT**

Spirit AeroSystems (Europe) Limited ("Spirit Europe") is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. This same commitment is shared by its parent organisation, Spirit AeroSystems, Inc. ("Spirit").

As stated within Spirit's Code of Conduct issued by its Corporate Compliance Officer, Spirit has a zero tolerance for the use of child labour, forced labour or human trafficking practices. Spirit will not knowingly do business with any subcontractors, business partner, supplier, or other third parties who violate this policy.

Spirit advises every employee to immediately report any concerns relating to child labour, forced labour, or human trafficking practices to their manager or the Corporate Compliance department.

## **2: STRUCTURE OF THE ORGANISATION**

Spirit is a global organisation and is one of the largest independent non-OEM aircraft parts designers and manufactures in the aerostructures sector. For the twelve months ended December 31, 2018, Spirit generated net revenues of \$7,222.0 million, and had net income of \$617.0 million. It is the wholly owned subsidiary of Spirit AeroSystems Holdings, Inc. and is the parent company of Spirit AeroSystems International Holdings, Inc. of which Spirit Europe is a subsidiary. Spirit has business operations in the United States, Scotland, France and Malaysia. Spirit Europe employs 942 employees in Prestwick, Scotland.

In order to fulfil the needs of Spirit Europe's customers, which include Airbus and Boeing, to design and manufacture aerostructures, we work with a range of suppliers across the globe. Spirit Europe works closely with and has developed positive relationships with our key suppliers. Due to the nature of our business and the strict compliance requirements we are subject to, we already engage fully with our suppliers to ensure that they can demonstrate compliance. We have a stable supply base that we work with regularly and have an expanded depth and knowledge of their business. If we engage new suppliers, we have a detailed process to audit their facilities prior to receiving orders. We operate within a very heavily regulated industry that requires the approval of suppliers not only by Spirit Europe but by its customers.

We consider that our sector is low risk due to the skilled nature of our workforce. However, we carry out on-site audits of all of our major suppliers (and have a number of different policies that are aligned with our obligations under the Modern Slavery Act 2015 in the UK, including a Code Conduct and Human Trafficking Policy).

## **3: POLICIES**

As part of Spirit's commitment to combating modern slavery, it has in place an organisation wide general Anti-Slavery/Trafficking Policy, as well as, a UK specific anti-slavery procedure, Modern Slavery Procedure.

Spirit also has a number of policies and procedures designed to comply with other global requirements and, where possible, will develop organisation wide policies and procedures (or adapt these) to ensure that appropriate and coordinated action is taken throughout the organisation.

The following organisation wide policies and/or procedures are relevant to Spirit's commitment to tackle modern slavery and human trafficking:

- Code of Conduct
- Human Trafficking Policy and Procedure
- Ethical Business Conduct Procedure
- Conflict Mineral Policy
- Conflict Minerals Reporting Process

Spirit also makes suppliers aware of applicable policies, and requires them to adhere to the same high standards. We also created a Supplier Code of Conduct incorporating language concerning human rights, which will apply to all suppliers, and will be distributed to suppliers.

Spirit Europe drafted and implemented language for our form supply contracts to include specific modern slavery clauses in new supply contracts entered into and existing contracts as amended. We will evaluate those contracts that do not contain these terms by the end of the following year and work to identify a means to address.

We also evaluate our procurement processes to ensure that we are undertaking appropriate due diligence at the outset of any new relationship with a supplier.

These processes have been developed by our compliance, supply chain and legal teams.

#### **4: DUE DILIGENCE**

As part of Spirit Europe's efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we carry out on site audits of all of our key suppliers on an annual basis. These on-site audits involve, as a minimum, a site tour. We will incorporate factors related to these issues as part of that onsite process for Spirit Europe suppliers.

We issued a survey in 2018 to Spirit Europe suppliers and will re-issue in the future for consistency. We will develop a means to identify gaps and create a plan based on a risk assessment.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

#### **5: RISK AND COMPLIANCE**

Spirit Europe will regularly evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by conducting the risk management activities narrated in the Modern Slavery Procedure.

We do not consider that we operate in a high risk sector due to the skilled nature of our workforce. We will, however, assess geographical risks as we accept that exposure may be greater depending on the geographical location and will take into account the Freedom House categorisation and the Transparency International Corruption Perception Index (CPI).

Where we have identified a potential risk through our risk assessment procedures, we will explore ways of remedying and mitigating these risks through due diligence, improved procurement practices or industry collaboration.

We ensure all our suppliers adhere to our policy prohibiting slavery. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. If we find evidence of a failure to comply with our policy prohibiting these types of acts, we will seek to terminate our relationship with the relevant supplier.

## **6: EFFECTIVENESS**

The effectiveness of our policies and procedures will be kept continually under review in order to ensure that these are robust enough to identify any issues.

## **7: TRAINING**

Spirit mandated training on this subject as appropriate and has and will continue to invest in educating staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees will be encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees will be taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

## **8: FURTHER ACTIONS AND SIGN-OFF**

Following Spirit Europe's review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the further steps narrated above to tackle slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Spirit's slavery and human trafficking statement for the financial year commencing 1 January 2018 and ending 31 December 2018.

Signature:



Scott McLarty

Spirit AeroSystems (Europe) Limited

**Date: 25 March 2019**