

Modern Slavery Human Trafficking 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 is taking in order to ensure that modern slavery or human trafficking is not

taking place within our business or global supply chain.

With the International Labour Organisation (ILO) estimating that almost 21 million people - 3 out of every 1000 people - being victims of modern slavery across all continents of the globe and growing concerns around the role of unscrupulous employment agencies we take seriously the fact that that we could potentially be perceived as any easy target for the illegal movement of forced labour with our global reach and we at Airswift 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.

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.

I can do no better than quote from the foreword to our Code of Business Ethics;

“Airswift operates in many institutions, economic, political, social and cultural environments that are in constant and rapid development. Activities must be performed in full respect of the law, in fair competition, with honesty, integrity and good faith, with due respect for the legitimate interests of its employees, shareholders, commercial and financial partners and the communities where it is present.”

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.

A handwritten signature in black ink, reading 'Janette Marx'. The signature is fluid and cursive, with a large, sweeping flourish at the end.

Janette Marx
Chief Executive Officer

Policies and Procedures

Organisational Structure

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 in 52 offices worldwide. Airswift Holdings Limited is the parent company for the following UK companies for which this statement also applies:

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

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:

- Anti-Bribery & Anti-Corruption Policy
- Confidential Reporting Procedure
- Code of Business Ethics.

Supply Chain Assessment

We conduct due diligence on all 3rd Party suppliers before allowing them to become a supplier. Before placing any candidates Airswift always carries out background checks to ensure that the candidate has the right to work in the relevant location.

Training

Communication of policies and procedures is facilitated by either email, briefings, presentations or classroom training, dependent upon the scale and detail of the information to be communicated. Detail of training or briefings delivered to employees is held on HR files and/or training registers.

Assessing Effectiveness in 2018

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.

This statement has been approved by the Board of Directors of Airswift Holdings Limited and is applicable to all companies within Airswift.



airswift.com

Airswift Holdings Ltd.
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Date: 6th December 2018
Version: 02
Owner: Senior HR Business Partner