

## **AE Aerospace Human Rights Policy & Procedure**

### **1. Introduction**

AE Aerospace is a leading subcontract precision machining company for the Aerospace and Marine markets. The AE Aerospace Human Rights Policy articulates our responsibility to respect all Human Rights in line with the UN Guiding Principles on Business and Human Rights (the UNGPs). This Policy focuses on the areas that have been identified as priorities for our industry.

The Policy is derived from:

- The United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights;
- The International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work;
- The United Nations Global Compact. Together, for the purposes of this Policy, the above documents are called the "International Human Rights Declarations".

### **2. Purpose**

The AE Aerospace Human Rights Policy sets out the principles for our actions and behaviour in relation to human rights. The Policy and associated practices are expected to strengthen over time as the Company's operating procedures create an environment where human rights are respected, and to also help ensure that we do not engage in activities that directly or indirectly violate human rights.

### **3. Scope**

This Policy applies to all employees of AE Aerospace subsidiaries and affiliates worldwide. In addition, our subcontractors working at our sites are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Approved Supplier list, and also by driving industry-based social and environmental standards, and we will also engage customers and joint venture partners on these issues.

The AE Aerospace Human Rights Policy complements and brings together the human rights aspects from other Company policies and guidelines. These include our Business Manual, the Health & Safety, Environment and Human Resources policies and the Anti-Corruption guidelines. In implementing this Policy, we are subject to the laws of the many countries in which we operate and we are committed to comply with all such applicable laws.

Where our Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with our standards. In situations where local law is less stringent than the International Human Rights Declarations, we endeavour to develop a response on a case-by-case basis while using our Policy as a guideline. Where local law prohibits us from upholding certain aspects of this Policy, we comply with these local laws while seeking to respect human rights.

## **4. Specific commitments and provisions**

### **4.1. Commitments to stakeholders**

**Employees:** We are committed to respect the human rights of our employees. We develop our employment policies with the aim to achieve uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations. We are committed to train our employees to be aware of and respect human rights in the workplace and in the local communities directly impacted by our operations.

**Business partners:** We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions. Suppliers operating in, or procuring from, areas where we identify our most severe risks, will be the key focus of this engagement.

**Local communities:** We seek to respect the human rights of local potentially-affected peoples and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations. The AE Aerospace External Stakeholder Engagement Procedure requires us to conduct an open and inclusive dialogue with local communities, including engaging with often under-represented groups such as women, children and Indigenous Peoples.

## **4.2. Specific provisions**

Health and Safety

### **Promoting Health and Safety**

AE Aerospace is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures that promote our philosophy of Safe Sustainable Steel.

Labour

### **Promoting Freedom of Association**

AE Aerospace upholds freedom of association and the effective recognition of the right to collective bargaining. We also work with our subcontractors and suppliers to promote the achievement of this principle.

### **Eliminating Forced or Compulsory Labour, human trafficking and all forms of Modern Slavery**

AE Aerospace opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. We will undertake work with our subcontractors and suppliers including due diligence within our supply chains to avoid indirectly benefitting from or promoting such illegal practices. AE Aerospace is also committed to publicly reporting on progress to eliminate slavery and human trafficking from its own operations and through its supply chain on a yearly basis.

AE Aerospace will ensure that operational grievance mechanisms allow for cases of forced labour to be submitted and addressed.

### **Abolishing Child Labour**

AE Aerospace opposes the use of child labour. We will work in collaboration with subcontractors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child.

### **Eliminating Unlawful Discrimination in the Workplace**

AE Aerospace is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated. The Company seeks to provide each employee with equal opportunity for advancement without discrimination.

### **Eliminating Harassment and Violence**

AE Aerospace is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate.

### **Providing Competitive Compensation and Remuneration**

AE Aerospace aims to pay competitive wages based on local market assessments and at a minimum seeks to provide a commensurate compensation for each employee.

### **Upholding Conditions of Employment**

AE Aerospace complies with all laws regarding conditions of employment including basic and over-time working hours, and will abide by agreements negotiated with our employee representatives.

Local Communities

### **Avoiding Involuntary Resettlements**

AE Aerospace seeks to avoid involuntary resettlements. In situations where it is unavoidable, we commit to comply with the national government's or regional authorities' guidelines on resettlement and rehabilitation and also act in line with international human rights norms on this subject including the International Finance Corporation Performance Standards.

### **Respecting Indigenous Peoples' Rights**

AE Aerospace respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards.

### **Adopting Proportionate Security Arrangements**

AE Aerospace aims to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines, such as the Voluntary Principles on Security and Human Rights. We will adapt our security arrangements to balance the need for safety while respecting human rights.

### **Developing practices for Land and Water use**

AE Aerospace works towards understanding and applying sound practices for land and water use consistent with emerging international practices while respecting human rights, and in support of our Environment Policy.

## **5. Governance and accountability**

Responsibility for the implementation of this Policy lies with the most senior executive responsible for each business segment, and for our centralized procurement system. These executives will report on any human rights hotspots arising within our operations or our supply chain to the Chairman of the Board of Directors at least annually.

## **6. Implementation**

The Company's implementation of this Human Rights Policy occurs through our due diligence procedures as well as targeted interventions and this is expected to strengthen over time as we increasingly focus on the potential for severe human rights issues. Implementation is supported by Procurement, Human Resources, Internal Audit, Compliance, Community, Environment, and Corporate Responsibility functions.

In the event of any employee becoming aware of human rights hotspots within our operations or supply chain, they will inform the senior executive responsible for the relevant business segment as soon as possible, and share this information with the Compliance and Corporate Responsibility teams.

This Policy is the overarching statement for other standards and procedures – such as the Code for Responsible Sourcing, the External Stakeholder Engagement Procedure and the Community Grievance Mechanisms Manual that will be developed as necessary by AE Aerospace on specific human rights matters.

This Policy is endorsed by the AE Aerospace Board of Directors. It is supported by a guidance manual, training and Company-wide communications and

AE Aerospace will share best practices between our operating units on rights-based grievance mechanisms, with the aim of establishing effective channels for redress for local stakeholders in relation to this Policy.

**7. Reporting**

We will report on the performance of these processes in our Annual Review.

**8. Review and monitoring**

AE Aerospace will periodically review the Policy and our implementation with respect to its suitability and effectiveness.

Signed

A handwritten signature in blue ink, appearing to read 'Peter Bruch', is positioned above the printed name.

Peter Bruch  
Managing Director

Date            January 2019

**This policy will be reviewed and revised as required at intervals not exceeding 12 months.**