



Modern Slavery Statement

Prepared by Airswift Holdings Limited

2023

INTRODUCTION

This updated statement, post our financial year ending 31st December 2022, is made pursuant to Section 54(1) of the UK's Modern Slavery Act 2015 and Section 16 of the Australian Modern Slavery Act 2018 and sets out the steps that Airswift has put in place in order to ensure that modern slavery or human trafficking is not taking place within our business or global supply chain.

Airswift Holdings Limited is a private limited company headquartered in the United Kingdom and is an international workforce solutions provider within the energy, process and infrastructure industries with over 1,000 employees worldwide. Airswift Holdings Limited is the parent company for the following Australian companies for which this statement applies:

Air Consulting Australia Pty Ltd (Australia)	ACN 106 063 674	Level 8, 179 Turbot Street, Brisbane QLD 4000
Competentia Pty Ltd	ACN 143 641 543	Ground Floor, 17 Ord Street, West Perth, WA 6005, Australia
Dare Holdings Pty Ltd	ACN 009 356 692	
Swift Technical (Australia) Pty Ltd (AUS)	ACN 125 300 290	
Energy Resourcing Australia Pty Limited	ACN 076 232 605	Level 17, 141 Walker Street, North Sydney NSW 2060
Swift Worldwide Resources Australia Holdings Corp Pty Ltd (AUS)	ACN 166 473 936	Ground Floor, 1002 Hay Street, Perth, 6000 Australia

Airswift is driven by three corporate hubs in Houston, Manchester and Singapore supporting 60 regional offices, including our Australian offices in Perth, Sydney and Brisbane. We take seriously the fact that we could potentially be perceived as an easy target for the illegal movement of forced labour with our global reach, and we 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.

ABOUT AIRSWIFT

For over 40 years Airswift has been transforming lives through the provision of international workforce solutions to the energy, process and infrastructure industries. Our core values are what support our vision, shape our culture and reflect what our company values. They are the essence of our company identity and embedded in everything we do:

- Life
- Excellence
- Growth
- Integrity

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.

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.

Transforming lives
through the world of work



LIFE



EXCELLENCE



GROWTH



INTEGRITY

**Our core values
are what support
our vision, shape
our culture and
reflect what our
company values.**



Janette Marx
Chief Executive Officer

OUR STRUCTURE

The structure of our organization (right) is built around our geographical reporting regions and our executive functions. Globally, we are over 1,000 colleagues across 60 countries.



James Allen
Business Ethics Officer & President



Jayden Wallis
President - ASPAC

MANAGEMENT & RESPONSIBILITY

The board is responsible for setting the objectives, identifying key risks and establishing the agenda for all aspects of our governance program. The board plays an active role in the oversight of the company financial performance, long and short-term strategy, enterprise risk and various environmental, social, and other sustainability factors.

We have also established a compliance and risk steering committee as a subgroup appointed by the board and tasked with identifying, reviewing and mitigating risks for the business.

The committee meets quarterly to look at all elements of risk across the business, as part of the ISO 9001 program.

Each quarter the committee reviews, heatmaps, analyzes, and discusses business operations to identify important external and internal risk factors and ensures the correct resources, initiatives and strategies are implemented across the business to mitigate them.

GOVERNANCE

HUMAN RIGHTS

We conduct our business in a manner that respects the human rights and dignity of all people. Our Human Rights Policy is guided by internationally recognized human rights, as set out in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Our Human Rights Policy outlines our commitments with regards to:

- Governance
- Ethical recruitment
- Employment contracts
- Working conditions
- Non-discrimination
- Modern slavery and human trafficking
- Safe working environments
- Child labor and young workers
- Freedom of association and collective bargaining
- Grievance mechanisms and disciplinary procedures

Our anti-slavery policy is embedded into our compliance program to make sure we continue to work ethically and avoid introducing human trafficking and slavery into any part of our supply chain or network.



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:

- **Modern Slavery & Human Trafficking Procedure:** which states our commitment to eliminating all forms of slavery in our business and supply chain.
- **Anti-Bribery & Anti-Corruption Policy:** This policy covers all our business interactions and association involving Airswift and read together with our Code of Business Ethics (CoBE) and Anti-Bribery and Corruption Procedure (ABC). It defines the principles for ethical conduct we are committed to. We have zero tolerance for bribery and corrupt activities.
- **Whistleblowing Policy:** This policy lays out the steps you can take to report, in good faith, any real and genuine concern of any Improper Conduct in the business whilst protecting the person making such disclosures from any reprisal and / or detrimental action.
- **Code of Business Ethics:** detailing equal opportunity, our commitment to diversity and our intolerance to modern slavery, discrimination, harassment, and bullying.

DUE DILIGENCE PROCEDURES

We conduct due diligence on all 3rd Party suppliers before allowing them to become an approved supplier. Airswift is aware of the importance of ongoing assessment of the supply chain, and therefore performs annual reviews of approved suppliers, which considers their provision and risk ratings to observe if any changes have occurred.

Before placing any candidates Airswift always carries out background checks to ensure that the candidate has the right to work in the relevant location. Airswift also conducts monthly Contractor Satisfaction Surveys for new contractors, those celebrating annual employment anniversaries, and those who have recently finished their assignments. These surveys provide individuals with the opportunity to give open, honest, and confidential feedback on their experiences during their assignments.



IDENTIFYING, ASSESSING AND MANAGING RISK

Due diligence on 3rd Party Suppliers is assessed by the Group Finance Director and/or the Business Ethics Officer in order to identify any potential slavery and human trafficking.

Furthermore, the Airswift Client Services Managers hold regular formal meetings on the client work site both with the client and the contractors, to assess work conditions.

In locations where there is an in-country office, contractors are encouraged to attend the office to speak with the Service Team regarding any issues that may occur during their assignment. This is an addition to the monthly Contractor Satisfaction Surveys.



KEY PERFORMANCE INDICATORS

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 can be assessed by:

- All new employees completing training on Airswift Policies and existing employees completing refresher training.
- 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.

TRAINING

Communication of policies and procedures is facilitated by either email, briefings, presentations, classroom training, or online training via the Airswift Learning Management System (LMS). The type of training given is 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.

Ethics and business conduct are considered to be core training modules and all employees are required to take these LMS training course as part of their induction process and on an annual basis during their employment with Airswift.



LOOKING FORWARD

Next Reporting Period Initiatives for Modern Slavery Risk Reduction:

Airswift's commitment for the upcoming reporting period involves efforts to mitigate modern slavery risks. The key initiatives we will focus on include:

- **Publication of Updated Modern Slavery Policy:** We will publish an updated Modern Slavery policy, which will be integrated into our larger group policy updates.
- **Ongoing Supply Chain Assessment:** Our commitment extends to the continuous evaluation of our supply chain through the use of our supplier questionnaire.
- **Industry Collaboration:** We will persist in collaborating with industry peers to learn from and contribute to best practices in the fight against modern slavery. This collaboration is facilitated through our membership with RCSA.
- **Employee Training:** Our workforce will undergo annual refresher training using our new system. This system allows real-time tracking of test results and automated reminders for completing annual refresher training.

This Modern Slavery Statement has been officially approved by the Board of Directors of Airswift Holdings Limited (along with associated Australian entities) on 17 October 2023.



Janette Marx
Chief Executive Officer

airswift
TRUSTED WORLDWIDE



airswift.com

Airswift Holding Limited
Modern Slavery Statement
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