

## **BOC Aviation Limited Modern Slavery Statement**

### **1. BOC Aviation**

BOC Aviation Limited (the **Company**) is a world-class aircraft operating lessor headquartered in Singapore and listed on the Hong Kong Stock Exchange (HKEX code: 2588). We are committed to achieving a more sustainable business model, contributing to a more sustainable environment, having a positive impact on our communities and achieving excellence in corporate governance.

We believe that a healthy corporate culture, robust governance framework and agile leadership are fundamental to responsible management of the business, which promotes and safeguards the interests of our stakeholders.

### **2. Commitment to the United National Sustainable Development Goals**

BOC Aviation is committed to supporting the United Nations (**UN**) Sustainable Development Goals (**Goals**), which constitute a universal call by the UN to end poverty, protect the planet and improve the lives and prospects of everyone, everywhere by the target date of 2030.

### **3. Our Employees**

As a global organisation, we attract a diverse workforce and provide our global talent pool with opportunities to leverage a cross-cultural working environment. The Company is committed to providing equal employment opportunities to all individuals without regard to race, colour, religion, gender, national origin, age, disability, marital status, or sexual orientation.

In line with the provisions of the United Nations Framework and Guiding Principles on Business and Human Rights, we prohibit the employment of child, forced or compulsory labour. We operate in compliance with all relevant laws and regulations that have a significant impact on the Group relating to preventing child and forced labour.

BOC Aviation is committed to UN Goal 8 (Decent Work and Economic Growth), which aims to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of child labour. UN Goal 8 also features the protection of labour rights and to promoting a safe and secure working environment for all employees. There was no incident of forced or child labour in 2021 and if such an incident were to occur, we would terminate the employment of the relevant person. We have a rigorous hiring process for all employees which are conducted in person to the extent possible. All employees complete and sign the employment application form to verify key personal information including their age. Compliance checks and employment reference checks will be carried out if deemed necessary.

BOC Aviation complies with all applicable employment laws. Employees enter into an employment contract which sets out working hours and rest periods, and the notice period for the termination of employment. The Staff Handbook, which is updated annually and available on the intranet for all employees, sets out in detail the Company's policies and procedures for termination of employment, retirement, working hours and annual and other forms of leave from work.

#### **4. Our Supply Chain**

BOC Aviation has a global network of suppliers to support its business and to diversify risks.

As a global aircraft operating leasing company, BOC Aviation relies on a small number of original equipment manufacturers and aerospace support services providers. The Company also has an extensive global network of third-party suppliers on an as-required basis including maintenance, repair and overhaul services providers, parts suppliers and specialist service suppliers such as engineering design and ferry flight operation providers.

During the year ended 31 December 2021, we surveyed our top suppliers regarding their ESG practices. The survey covered key areas including workplace safety and health, and whether they had policies against child or forced labour. The survey is conducted annually and allows the Company to monitor our top suppliers in the area of child or forced labour. No major supplier is identified as having significant risks of child labour, young workers exposed to hazardous work or forced labour, and all our major suppliers confirmed they are in compliance with labour standards.

#### **5. Risk Management and Internal Control**

BOC Aviation strives to always act ethically and with integrity. The Board and management each has responsibility to identify and analyse risks underlying the achievement of business objectives and to determine how such risks should be monitored, evaluated, managed and mitigated.

BOC Aviation takes a holistic approach to compliance. We have specific policies and procedures against illegal and unethical behaviour such as an anti-bribery policy, an anti-corruption statement and anti-money laundering policy. We also have policies and procedures in place to monitor compliance with international sanctions and will not enter into any transaction that is prohibited by sanctions. 'Know your customer' (KYC) assessments are conducted on all potential counterparties, and we monitor existing customers as part of our regular process. A 24-hour whistleblower hotline and web portal are available for the anonymous reporting of any improper, illegal or criminal activity by our employees or external parties.

All employees completed compliance training for the year ended 31 December 2021. The compliance training is conducted annually and covers topics including fraud and ethics awareness, anti-corruption, anti-bribery and data protection. All employees also certify annually that they will abide by the Company's Code of Professional Conduct, which contains guidelines regarding transparent, ethical and professional behaviour.

**6. BOC Aviation (UK) Limited**

BOC Aviation (UK) Limited is a wholly-owned subsidiary of BOC Aviation Limited, whose principal activities are the leasing of aircraft and the provision of services to its holding company and other related companies. The registered address of BOC Aviation (UK) Limited is c/o Cogency Global (UK) Limited, 6 Lloyds Avenue, Unit 4CL, London, England, EC3N 3AX.

**7. This Statement**

This constitutes the Modern Slavery Statement of BOC Aviation Limited and its subsidiaries, including BOC Aviation (UK) Limited, made pursuant to the UK Modern Slavery Act 2015 and is signed by the Managing Director and Chief Executive Officer. All information reported in this statement are for the year ended 31 December 2021 and as at 31 December 2021, unless otherwise indicated.

Please refer to the Company's 2021 Environmental, Social and Governance Report available at [www.bocaviation.com](http://www.bocaviation.com) for more details of the Company's ESG efforts across our offices in Singapore, Dublin, London, New York and Tianjin for the year ended 31 December 2021.



**Robert James Martin**  
**Managing Director and Chief Executive Officer**

26 April 2022