



# AIT

BUILDING THE FUTURE  
OF AEROSPACE

## MODERN SLAVERY STATEMENT

This statement is pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2023.

Advanced Integration Technology, LP (AIT) is committed to ensuring slavery and human trafficking are not taking place in our business or supply chains. This statement sets out the actions taken by AIT and its operating companies, during the financial year ending 31 December 2023 to ensure slavery and human trafficking is not taking place in any part of our operations or supply chain.

### Our Corporate Structure

Advanced Integration Technology, LP (AIT) is a corporation incorporated under the laws of the State of Delaware, USA. AIT is a leading aerospace and advanced tooling manufacturing company, with its headquarters based in Plano, TX. AIT provides advanced systems and services for commercial, military, and government customers worldwide. As a global technology and innovation-driven company, we depend on a highly skilled workforce comprised of approximately 400 employees.

Advanced Integration Technology consists of six highly specialized businesses: Nova-Tech Engineering Inc., Advanced Integrated Tooling Solutions LP, Advanced Integration Technology S.L., Advanced Integration Technology Europe SAS, and Advanced Integration Technology UMEA AB (Sweden) with each segment comprised of groups of similar operations.

- Advanced Integration Technology LP (Texas) houses its executive offices, automated tooling and integration project management, supply chain management, software development, design engineering, HR, Installation/Maintenance, and financial management functions.
- Nova-Tech Engineering Inc. (Texas) is a designer and integrator of critical assembly automation, materials handling, and friction stir welding equipment and tooling for all the major commercial aircraft manufacturers and is also engaged with defense work and space launch vehicles.
- Advanced Integrated Tooling Solutions LP (Michigan) delivers a broad range of custom equipment, machines, and tooling and provides design services as well as high-precision fabrication, machining, and assembly.

- Advanced Integration Technology S.L. (Spain) provides CATIA, FAE, SolidWorks, and Unigraphics designs as well as stress analysis testing capability. Its experienced mechanical design staff helps AIT provide fast and efficient service, support, and project management to its European projects and customers.
- Advanced Integration Technology Europe SAS (France) provides supportive services to our European customers.
- Advanced Integration Technology UMEA AB (Sweden) specializes in designing, developing, and manufacturing Automated Guided Vehicles and other mobile material handling solutions.
- Nova-Tech Engineering Inc. (Germany) Business development whose purpose is sales and marketing in Europe.

## **Our Operations**

Advanced Integration Technology provides technologically advanced and intelligent solutions for the global aerospace industry. Advanced Integration Technology business units design, develop, manufacture, and support a comprehensive range of solutions for aircraft manufacturers, airlines, business jet operators, and many other customers worldwide.

## **Our Supply Chain**

Advanced Integration Technology seeks to develop strategic relationships with reputable, responsible suppliers that are committed to the highest standards of ethics and business conduct. We rely on a global supply chain to deliver goods and services in a timely and satisfactory manner, and in full compliance with applicable terms and conditions.

Our global supply chain spans many industries. Our suppliers can be divided into two broad categories:

- Product suppliers (a/k/a “direct” suppliers) – i.e., those that support the delivery of services and products to our customers; and
- Non-product suppliers (a/k/a “indirect” suppliers) – i.e., those that support our operations.

The products we procure for the delivery of our programs are predominantly high-end technology or custom products. We procure from large multinational companies and small and medium-sized businesses.

Many of our tier-one suppliers are from regions considered to be low risk for modern slavery and human trafficking (e.g., North America (U.S. and Canada), the United Kingdom, and mainland Europe).

## **Our Exposure to Modern Slavery**

We consider our exposure to modern slavery to be low due to the nature of our business, the marketplaces that we and our suppliers operate in, and our company’s policies and procedures for combatting modern slavery (these are described in more detail in the below section titled, “Managing Modern Slavery Risks”).

## **Risk in Our Operations**

We do not have a significant risk of modern slavery within our operations or workforce. We condemn and prohibit human trafficking as well as forced and child labor. Our internal policies and procedures are designed to provide a positive, safe work environment, ensure compliance with applicable law, and respect and protect human rights. As an aerospace tooling company, we operate in a highly regulated industry, predominantly employ a highly skilled workforce, and do not operate in any sector or industry that has a prevalence to modern slavery risks.

## **Risk in Our Supply Chain**

Because of the nature of the goods and services we predominantly source, where our suppliers are predominantly located, the risk-based due diligence we conduct to ensure potential strategic suppliers are qualified and reputable before onboarding, and our standard terms and conditions of purchase requiring suppliers to comply with applicable laws, we do not have a significant risk of modern slavery within our supply chain. However, we recognize that forced labor and related practices have the potential to intersect with our supply chain, and as described below in more detail, we have established policies and procedures to mitigate that risk.

## **Managing Modern Slavery Risks**

Advanced Integration Technology is committed to responsible and ethical business practices and expects our employees, as well as our customers, suppliers, and other partners, to uphold principles respecting and protecting human rights.

## **Advanced Integration Technology Code of Conduct**

Advanced Integration Technology’s Code of Conduct (the “*Code of Conduct*”) is intended to inspire, guide, and support our best performance – individually and collectively. The *Code of*

*Conduct* provides information about how we should conduct our business and hold ourselves to the highest standards of business conduct. By setting standards and guiding us in line with our AIT values, the *Code of Conduct* helps us to build a strong ethical culture and to achieve our business goals with integrity. It applies to all our directors, officers, and employees, and in certain respects, to business partners such as suppliers, consultants, representatives, and agents. Among other things, the *Code of Conduct* includes the following statements regarding selecting and collaborating with the right partners and the protection of human rights:

*We choose our business partners based on merit and shared values and treat them fairly. We seek business partners who can help us achieve our goals by working collaboratively to provide expertise, resources, efficiency, and innovation. This helps us deliver excellent, reliable products on time and on budget. We expect partners to share our high ethical and safety standards and our passion for making a positive impact in the world. Selecting and collaborating with the right partners means that we:*

- Seek to do business with partners who meet our needs and share our values;
- *Conduct risk-based due diligence to ensure potential partners are qualified and reputable before onboarding;*
- Monitor business partner performance on an ongoing basis;
- *Expect our partners to uphold our values and comply with anti-bribery conventions and all other applicable laws; and*
- Formalize relationships in writing to provide transparency and accountability.

*Respecting and protecting human rights means that we:*

- *Ensure safe and healthy working conditions for our employees, by applying best practices in our day-to-day activities and facilities and ensuring compliance with the most stringent applicable EHS standards;*
- *Promote responsible sourcing practices and hold business partners accountable to the standards we set in our Supplier Terms and Conditions and Code of Conduct;*
- *Work only with business partners who share our commitment to fighting human trafficking and supporting human rights;*
- Condemn and prohibit the use of child or forced labor; and
- *Follow company policies, regulations, and guidance regarding potential conflict minerals.*
- The *Code of Conduct* is available [here](#).

## **Internal Accountability Standards – Reporting Encouraged, without Fear of Retaliation**

Advanced Integration Technology is committed to a culture where people are encouraged and confident to speak up, without fear of retaliation. This is an enterprise-wide Core value.

Advanced Integration Technology promotes behaviors based on trust, respect, accountability, collaboration, and innovation. When employees, contractors, and partners observe or suspect something that conflicts with our values, the *Code of Conduct*, company policies or laws and regulations, we encourage them to speak up and report it. The Advanced Integration Technology Employee Reporting Hotline is an anonymous reporting channel for all stakeholders to report any type of issue or concern. Advanced Integration Technology has zero tolerance for retaliation of activities that impact good-faith reporting, and anyone engaging in retaliatory behavior is subject to disciplinary action.

## **Internal Training**

Advanced Integration Technology recognizes that our people play an important role in building and maintaining a strong ethical culture where we achieve our business goals with integrity, in accordance with our *Code of Conduct*, and applicable laws. All employees receive annual ethics and compliance training. We also make training available to all employees on recognizing and mitigating the risk of human trafficking and modern slavery in supply chains.

## **Supply Chain Expectations and Assessment Processes**

Advanced Integration Technology's suppliers are critical to our success and our ability to provide superior products and services responsibly. As a vital part of our team, we have the same expectations of our suppliers for ethics and compliance as we have for our officers, directors, employees, and representatives.

- **Compliance with all Applicable Laws:** Our standard terms and conditions of purchase require suppliers to comply with all applicable laws and regulations.

Advanced Integration Technology **Supplier Code of Conduct (*Supplier Code*)** establishes the principles and expectations we expect from our suppliers in regard to business conduct, ethics and compliance. Among other things, the *Supplier Code* requires suppliers:

- To ensure child labor is not used in the performance of their work, whether or not related to the Advanced Integration Technology business.
- To comply with laws and regulations prohibiting human trafficking. This includes prohibiting the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery, or trafficking in persons.
- To develop and implement policies and procedures to ensure that employees may perform their work in an environment free from physical, psychological, or verbal harassment or intimidation, or any other form of abusive conduct.
- To pay all workers at least the minimum wage required by the applicable laws and regulations and, at a minimum, provide all legally mandated benefits, as well as to compensate all hourly workers for overtime at the rate required by applicable laws and regulations.
- To flow down the principles outlined in the *Supplier Code* to their business partners providing products or services that will be incorporated in products or services furnished to Advanced Integration Technology.
- To allow Advanced Integration Technology and/or its representatives to assess the supplier's compliance with the expectations outlined in the *Supplier Code* in performing work for Advanced Integration Technology, including on-site inspection of facilities.

The *Supplier Code* is available on the Advanced Integration Technology's website ([www.aint.com](http://www.aint.com)).

- **Advanced Integration Technology's standard terms and conditions** also require a supplier to adopt and comply with a code of conduct or policy statement regarding business conduct, ethics, and compliance that satisfies, at a minimum, the principles and expectations outlined in the *Supplier Code*; a supplier's failure to do so can result in contract termination.
- **Supplier Assessment and Verification (including Audits):** Suppliers are subject to robust selection processes and criteria, including, for example, verification against government denied party lists. Periodically, in the normal course of business, we may conduct a site visit with a supplier. However, in the ordinary course of business, we do not conduct site visits or otherwise evaluate or audit suppliers specifically for the purpose of verifying the eradication of slavery and human trafficking in their supply chains. Anyone who

suspects or observes such conduct is encouraged to ask a question or raise concerns, including in complete confidence, through the resources described above in the section titled, “**Internal Accountability Standards – Reporting Encouraged, Without Fear of Retaliation.**”

- **Supplier Certification:** In the normal course of business, we do not require suppliers to expressly certify that materials incorporated into goods furnished to us comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Sub-tier suppliers that directly support U.S. Government prime contracts must include Federal Acquisition Regulation (“FAR”) clause 52.222-50, Combating Trafficking in Persons, where applicable. This clause contains a reporting obligation to notify the Contracting Officer and the agency Inspector General immediately of any credible information we receive from any source that alleges an employee or subcontractor has engaged in conduct that violates the policy. Suppliers must submit certifications where required by FAR.

### **Measuring the Effectiveness of Our Actions**

Questions or concerns raised through the above-described reporting mechanisms would be directed to Global Ethics & Compliance for a thorough investigation. No such reports or concerns were made during the Reporting Period, and we have not otherwise identified any instances of modern slavery or human trafficking in our business or in our supply chain. This is consistent with our assessment that overall, our exposure to human trafficking and modern slavery is low.

### **Continuous Improvement Efforts to Mitigate Risk**

Since December 31, 2023, Advanced Integration Technology has taken, or intends to take the following steps as part of our regular business operations to continue to ensure modern slavery is not taking place in its organization or supply chain.

- Raise internal and external awareness regarding our corporate policy condemning and prohibiting the use of child and forced labor;
- Seek to do business with reputable, responsible suppliers that are committed to the highest standards of ethics and business conduct;

- Require our suppliers, through our standard terms and conditions of purchase, to represent that they will (1) comply with all applicable laws and regulations (including those that prohibit forced labor and modern slavery) and (2) comply with a code of conduct or policy statement regarding business conduct, ethics and compliance that satisfies, at a minimum, the principles set forth in the Advanced Integration Technology Supplier Code of Conduct;
- Provide employees with training resources designed to increase awareness of ethics and compliance matters generally, as well as on recognizing and mitigating the risks of human trafficking and modern slavery in supply chains;
- Through our Human Rights Authority, thoroughly investigate any concerns or allegations of misconduct submitted to Advanced Integration Technology and, if substantiated, resolved through appropriate corrective action; and
- Monitor the development of new regulations relating to the prevention of modern slavery and human trafficking, to ensure that our policies and procedures remain current and compliant.