# Triumph Group, Inc. (Company No. 51-0347963) Modern Slavery Act Statement – Financial Year ending March 2019

## An Introduction to Triumph Group

Triumph Group is a global leader in manufacturing and overhauling aerospace structures, systems, and components. Triumph Group designs, engineers, manufactures, repairs and overhauls a broad portfolio of aviation and industrial components, accessories, subassemblies, systems, and aircraft structures.

Further detail on what we do, including our locations can be found at www.triumphgroup.com.

This statement will apply to all subsidiaries of the company which can be found at <a href="https://www.sec.gov/Archives/edgar/data/1021162/000102116218000018/tgi-ex211x3312018.htm">https://www.sec.gov/Archives/edgar/data/1021162/000102116218000018/tgi-ex211x3312018.htm</a> with an annual turnover in excess of £36m per year, which carry on business in the UK.

#### **Our Commitment**

Triumph Group, Inc. and all of its subsidiaries ("Triumph Group") are fundamentally opposed to all forms of modern slavery and are committed to conducting our business in line with this core value, our respect for human rights and our belief that everyone should be treated equally and with dignity.

It is widely recognized that modern slavery can be difficult to detect and control but we are committed to doing what we can as a responsible business to try to ensure that there is no modern slavery in any part of our business or our supply chains and we are engaged in an ongoing process of improving and strengthening our procedures and systems in this regard.

Triumph Group is clear in its expectations and we expect all individuals involved with our business and supply chains to comply with our values. Any instances of non-compliance will be addressed swiftly.

## **Our Supply Chain**

We work with a global supply chain consisting of over 12,000 suppliers spanning more than 50 countries, many of whom will be deploying their own anti-slavery systems.

Our suppliers primarily consist of those providing assembly, fabrications, machining, metals, castings, forgings and composites commodities as well as electrical and engineered items. We also engage with aircraft, electrical, MRO and OEM products, construction materials, and advanced supply chain management and logistics services.

The level of skill and qualification required for much of the activity undertaken in Triumph Group's business and supply chain reduces the risk of slavery or human trafficking occurring, however, we recognise that the length and complexity of our supply chain represents challenges in relation to this issue.

We are striving to do what we can to try to eliminate the risk of modern slavery occurring in our business or supply chain. This includes taking steps to attempt to ensure that our suppliers and partners share the same values as we do, including for example requiring suppliers to comply with our Code of Conduct, our Supplier Quality Assurance Manual and applicable laws, rules and regulations.

#### **Our Staff**

We strive to maintain a fair and ethical workplace for our staff as documented in our Anti-Slavery and Human Trafficking policy, which is available to all Triumph employees via our internal intranet.

We prohibit the use of all forms of forced labour and any form of human trafficking. We currently have the following procedures in place to proactively manage the risk:

- We have robust recruitment processes in line with local employment laws, including relevant document checks and requirement and proof that all employees be at least 18 years of age.
- We provide compensation in line with industry standards which is reviewed annually and adjusted as appropriate to account for inflation, increased responsibility and/or excellent work performance. We also provide industry standard benefits packages, including, where applicable, health and welfare insurances as appropriate for the level of employment.
- We run an anonymous Ethics Hotline which is available to all employees via our internal intranet.
- Triumph Group's Code of Conduct is shared with and applies to all employees and requires compliance with all applicable laws and corporate policies (including our Anti-Slavery and Human Trafficking Policy) which are available via Triumph's Global Policies site.

## **Further steps**

We are continually striving to improve our approach to attempting to eradicate the crime of modern slavery from our business and supply chain. In furtherance of this goal, and as part of an ongoing program of improvements to our approach to this serious issue, we intend to embark on taking following steps:

- Include a specific modern slavery and human trafficking flow down requirement in our Supplier General Terms & Conditions.
- Include a training course on modern slavery and human trafficking in our Triumph Group LearningConnect mandatory training requirement for all relevant supply chain employees.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our firm's slavery and human trafficking statement for the financial year ending March 2019.

This statement was approved by the Board of Directors of Triumph Group, Inc. on [24] April 2019.

Director