



Millennium

MILLENNIUM AERO DYNAMICS PVT. LTD.

MODERN SLAVERY AND ANTI-HUMAN TRAFFICKING STATEMENT

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This statement is made regarding the Modern Slavery Act 2015, which requires employers to be transparent about their efforts to end slavery and human trafficking in their supply chain. Millennium Aero Dynamics Private Limited (herein after written as MADPL) continues to see high ethical standards in the conduct of our business activities and within our supply chain.

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. MADPL has a zero-tolerance approach to any form of modern slavery. This includes making sure that our company practices are compliant with human rights and employment legislation in all areas that our business operates.

We are committed to end modern slavery and are taking the appropriate steps to make sure that everyone who works for MADPL benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

The information in this statement details policies, statements, and actions we have taken to make sure that slavery and human trafficking are not taking place in our supply chains or any part of our own business. At MADPL, work is undertaken by our Human Resources and Senior Management team to assess compliance with our labour, ethics and human rights management processes, identifying the adequacy of current controls, and recommending any applicable corrective actions required. Our Senior Management team has the responsibility of reviewing the effectiveness of actions taken.

OUR BUSINESS

Millennium Aero Dynamics Private Limited has been operating as a trustworthy service provider to the Indian Aviation Industry since last three decades and has successfully transformed itself from a traditional agency set-up into a sophisticated end-to-end solutions provider.

From a modest beginning with a staff of just 3 people, Millennium has today built a robust team of more than 600 people including sales professionals, engineers, consultants, industry experts, technicians, and support staff. Moreover it has grown to represent more than 25 international principals and has been successful in becoming a frontrunner in introducing high technology products in the Indian Transportation Infrastructure Segment.

As a strategic vertical integration move, Millennium has strengthened its Marine division by acquiring a reputed company engaged in Heavy Fabrication named 'C4 Fabricators Pvt. Ltd'. The company has a strong track record of executing several high tech projects within various Defence & Non-defence shipyards and have already supplied more than 50 HULL UNITS for the Indian Navy.

Today, Millennium is expanding rapidly and extending its core expertise and commitment into other business segments. Millennium now has structured operating procedures, a strong commitment to its quality policy, and dynamic vision to transform the Transportation Infrastructure Segment in India.

OUR POLICIES

MADPL has policies and statements in place to support us in ensuring modern slavery is not taking place in our supply chains or business:

<https://www.millennium.in/quality-policy-and-certification.php>

- Human Rights Policy
- Code of Conduct & Ethics Policy

We continue to review our policies, practices and how we identify any risks of modern slavery and other human rights as part of our continued commitment to ethical and responsible business practices. Over the next 12 months, MADPL will be scrutinising our procurement policy and reviewing our purchasing practices, with a particular emphasis on recognising any areas of our procedures that might exacerbate the risks of forced labour in our supply chain.

OUR RISKS

As an international business with suppliers and customers worldwide, we recognise that the highest risk to our business regarding modern slavery lies within countries in which we or our suppliers operate where human rights are less protected. We have identified the countries at high risk of forced labour and the vulnerable groups of workers within our supply chain which may include the use of migrant workers and students.

We believe that the actions we take to regulate our supply chain help to offset and negate this risk. We have conducted a risk analysis to identify areas of high risk and have applied controls to mitigate those risks associated with our business activities. This has allowed us confidence in our continued compliance with relevant legislation including the Modern Slavery Act 2015.

OUR SUPPLY CHAIN

MADPL is committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our supply chain is made up of long-term business relationships with products and services that we use in our business; employees, partners, suppliers, and contractors. We continue to work with a diverse set of suppliers who are financially stable and ethically responsible. As part of our initiative to identify and mitigate risk, our procurement team strives to continuously improve and support our business to have an effective sight of our supply chain. We will assess the suitability of businesses within our supply chain, ensuring checks are conducted before approving companies onto our approved supplier list, this includes checking supplier modern slavery statements and their compliance to the Act.

We conduct due diligence on all suppliers and contractors by continually monitoring our supply chain. We ensure that we only work with businesses, who treat their obligations towards modern slavery with the same importance we do. Where suppliers and contractors do not meet the standard required, we would ask them to demonstrate the action they are taking to improve and then subsequently terminate the business relationship if the required improvement is not forthcoming. Where a supplier or contractor is found to have had any involvement in modern slavery, we would immediately end the business relationship and take further action if necessary. Measures we have taken provide us with the reassurance that our suppliers and contractors have the same level of commitment to ending slavery and human trafficking as we do.

OUR EMPLOYEES

All of our employees worldwide share our commitment to eradicating modern slavery. We acknowledge that modern slavery poses a risk to all areas of our business. We highlight the crucial role our employees play in helping us to ensure that modern slavery is not taking place by placing posters throughout the business to raise awareness and to inform employees about the issue.

We conduct training for our Management and Procurement teams so that they understand the risks associated with human trafficking and forced labour in supply chains and how to effectively carry out our policies and standards. Training is provided on what to do if they suspect that it is taking place within our supply chain. All of our employees are encouraged to identify and report any potential breaches of our anti-slavery stance.

Our HR Manual details our commitments to labour and working rights. MADPL provides fair working conditions for all our employees including terms and conditions of employment, pay, working hours, health and safety, resting time and holiday entitlements. Forced or compulsory labour is prohibited, and coercion at work is not tolerated within our business. All employees are required to read and abide by our employee handbook, which details how employees can raise any uncertainties. Slavery and human trafficking are considered ethical concerns and employees are encouraged to express concerns openly and in confidence at any time.

OUR COMMITMENT

This statement fulfils the requirements of Section 54 (Transparency in supply chains) of the Modern Slavery Act 2015 and covers the period of March 2020-February 2021. This statement has been established and implemented with the approval of the Chairman and Chief Executive Officer as a sign of the Company's commitment at the highest level.

Milan R Zatakia

Chairman and Chief Executive Officer
MADPL

20th January 2021