



# Modern Slavery Transparency Statement

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Financial year ending 31 December 2020

# Modern Slavery Statement f/y 2019-2020

## Introduction

In January 2020, Wesco and Pattonair merged and have since rebranded as Incora™, a leading, global provider of innovative supply chain solutions, managing all aspects of the supply chain from procurement to warehouse management to on-site customer services. This is the second combined modern slavery statement for Incora™ and is made pursuant to section 54(1) of the Modern Slavery Act 2015. This statement is made by the board of directors for Wesco Aircraft EMEA, Limited, Pattonair (Derby) Limited and Pattonair Limited (together referred to herein as “Incora™”) for the financial year ending 31 December 2020.

Incora™ has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically in all our business dealings and relationships. This statement details the ways in which Incora™ combats slavery and human trafficking and its aspirations for the future in this regard.

## Organisational Structure

Incora™ operates across the world in multiple locations supporting a global customer base. Our global headquarters are in the United States and our European headquarters in Derby, United Kingdom. Our services range from traditional distribution to the management of supplier relationships, quality assurance, kitting, just-in-time delivery, warehouse management and point-of-use inventory management.

## Our Supply Chains

We are mindful of the fact that our suppliers present the greatest potential exposure to modern slavery and we therefore have risk assessment processes to understand and minimise such risks. Incora has approximately 8000 vendors around the globe and their effective management is at the heart of our business. Our supply chain includes suppliers that we manage directly and those that we deal with on behalf of our customers. Incora deploys a robust supplier selection and management process that starts with numerous audits to ensure compliance to appropriate quality standards as well as environment and legal requirements. In addition to price, quality and delivery performance, suppliers are selected based on their compliance to the required legal and ethical standards, including modern slavery.

When we engage with a strategic supplier, a Supplier Profile Survey is undertaken to ensure appropriate due diligence. A key part of this survey assessment is to determine whether or not the supplier has appropriate policies and procedures in place to deal with modern slavery. Throughout the relationship we carry out an ongoing risk analysis, looking at the geographical location of the strategic supplier and their extended supply chains, the type of product supplied and the type of supplier (specifically whether they are an Original Equipment Manufacturer or a distributor). There are also internal approval processes in place prior to the placing of purchase orders. Supplier approvals are reviewed at regular intervals.

If any supplier is unable to comply with our supplier standards, including those regarding slavery and human-trafficking, we will take appropriate action. This may include the cancellation of purchase orders, escalation of concerns within Incora™ and alerting local authorities of any suspected or confirmed illegal activity where appropriate.

### **Our Policies**

The integration of policies continues and there is a comprehensive ethics and labour policy in the legacy Wesco business which prohibits the use of forced, bonded or indentured labour and regulates the use of agents. There is also an Anti-Slavery and Human Trafficking Policy in place in the legacy Pattonair business. The consolidation and standardisation of processes across the group is continuing as the pandemic diverted resource from this over the past 18 months, but our focus remains on taking the best practice from legacy Wesco and Pattonair and rolling this out across the Incora™ group.

### **Training**

In addition to inclusion in the Onboarding Handbook, training has been rolled out to members of our Strategic Procurement team to raise awareness of the company's obligations under the Modern Slavery Act and what constitutes modern slavery, potential signs to look out for and what to do in the event that an instance of modern slavery is suspected. Our intention is to consolidate training across Incora™ to increase awareness and to support our policies in this area.

Approved by the board of Pattonair (Derby) Limited:



Approved by the board of Pattonair Limited:



Approved by the board of Wesco Aircraft EMEA, Ltd.



Dated: October 28, 2021