

**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 building a more sustainable global economy and continuing to strengthen our business strategies and operations in the areas of environment, social and governance.

2. Commitment to the United National Sustainable Development Goals

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

3. Our Employees

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.

We support the provisions of the United Nations Framework and Guiding Principles on Business and Human Rights and we prohibit the employment of child, forced or compulsory labour. All employees complete and sign the employment application form to verify key personal information including their age. In 2022, no operation or major supplier is identified as having significant risks of child labour, young workers exposed to hazardous works, or forced or compulsory labour. We have implemented controls to ensure there is no forced or child labour in our Company.

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.

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 mainly on original equipment manufacturers and aerospace support services providers, the majority of which we have a long-term contract with. The Company 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 2022, 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 areas of child or forced labour. In 2022, all our major suppliers confirmed they are in compliance with labour standards.

5. Risk Management and Internal Control

BOC Aviation is firmly committed to a culture of transparency and compliance and conducts its business affairs with honesty and 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.

Exposure to risk is identified on a 360° basis. It is then evaluated, monitored and managed in all key areas of our business and new risks are updated using heat mapping. The management team has established separate lines of defence to mitigate risks the Company may be exposed to in its business operations. The Company uses key risk indicators to assess the effectiveness of the Company's risk management, and to regularly report to the Board. The Board Risk and Audit Committees regularly review existing and emerging risks in the Company, which are then discussed at the Board. Both the Board Risk and Audit Committees are chaired by independent, non-executive directors. Key risk indicators are incorporated in the Company's targets to drive good performance.

BOC Aviation has specific policies and procedures against illegal and unethical behaviour such as an anti-bribery policy, an anti-corruption statement and an anti-money laundering policy. We also have policies and procedures in place that are designed to monitor and ensure compliance with international sanctions and other applicable laws and regulations. "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 2022. 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 2022 and as at 31 December 2022, unless otherwise indicated.

Please refer to the Company's 2022 Environmental, Social and Governance Report available at 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 2022.



Robert James Martin
Managing Director and Chief Executive Officer

28 April 2023