

MODERN SLAVERY STATEMENT

NetJets Europe Group (“**NetJets Europe**”) is committed to combat slavery and human trafficking. NetJets Europe recognises that slavery and human trafficking are still a reality in our society and will not tolerate slavery and human trafficking in our business or supply chain. NetJets Europe is committed to acting ethically and with integrity in all our business dealings and relationships and has taken steps to implement effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains.

Our commitment to integrity and ethical behaviour is of the utmost importance, without which we would be unable to provide the superior air transportation experience that has become our hallmark. In the spirit of this commitment, we manage our business in strict compliance with all applicable laws and regulations of the United Kingdom, European Union, countries and regions in which we operate. We also manage our business in accordance with our high standards of business conduct and society's expectations for ethical behaviour.

Organisation's structure

NetJets Europe is service-led in business aviation, providing aircraft fractional ownership and flight services. Our NetJets Europe Headquarters is based in Paço de Arcos, Portugal.

Our business

With nearly 30 years of leadership, NetJets Europe operates a fleet of over 124 aircraft in Europe.

NetJets Europe's operations are based on 6 balanced operating principles (SAFETY, OWNER VALUE, OPERATIONAL EXCELLENCE, EMPLOYEE VALUE, SHAREHOLDER VALUE, INTEGRITY).

Relevant policies

NetJets Europe operates a number of internal policies to ensure that its business is conducted in an ethical and transparent manner. These include:

Recruitment – NetJets Europe operates a robust recruitment policy, including conducting eligibility checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Code of Business Conduct and Ethics Policy – NetJets Europe's code of business conduct and ethics policy ensures that all employees are required to adhere to the highest level of ethical conduct and fair dealing. NetJets Europe is committed to compliance with all laws in every country where it does business. Our expectations regarding compliance are outlined in such policy. We require all employees to manage their activities to comply with all laws, rules, safety regulations, and corporate policies.

Prohibited Business Practices Policy - This policy sets forth NetJets' position against bribery (UK Bribery Act 2010) and corruption (U.S. Foreign Corrupt Practices Act of 1977), and describes the minimum procedures that must be followed to ensure compliance with such Policy and anti-bribery and anti-corruption laws.

Health and Safety – This policy sets out NetJets Europe’s approach to ensure we provide a healthy working environment for our staff and contractors who work out of our premises.

NetJets Online and Hotline Reporting – Employees can raise concerns about how they or their colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.

Our supply chains

NetJets Europe supply chains are based throughout the world and include, namely but not limited to, aircraft manufacturers, maintenance service centres, training and simulators, catering, handling, facilities, airport, and ground services.

NetJets Europe conducts due diligence on all suppliers before allowing them to start rendering any service or delivering any product. Such due diligence includes assessing regulatory licences and certificates, compliance with such regulatory bodies, checks to determine the financial stability of the supplier, as well as carrying out supplier audits, where appropriate.

Further steps

NetJets Europe intends to continue to take the following further steps to combat slavery and human trafficking:

1. Notify all existing suppliers of NetJets Europe’s expectations and their obligations in relation to the prohibition of modern slavery; Require our suppliers to complete a Code of Conduct questionnaire before engaging in any contracts;
2. Include appropriate measures in NetJets Europe’s due diligence processes for sourcing suppliers, subcontractors, and acquisitions on a risk assessed basis;
3. Provide training to relevant employees to ensure a high level of understanding of the risks of modern slavery and human trafficking; and
4. Where appropriate, NetJets Europe will include a reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes NetJets Europe’s slavery and human trafficking statement for the current financial year.

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NETJETS EUROPE Group
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