MODERN SLAVERY TRANSPARENCY STATEMENT – 2024

In accordance with Section 54 of the Modern Slavery Act 2015, the following statement sets out the steps that the Affinity has taken during the year ended 31st December 2024 to ensure that there is no modern slavery or human trafficking taking place in our business or supply chains. This statement encompasses the activities of all related Affinity companies, comprising of Affinity Capital Works Limited, Affinity Flying Services Limited, and Affinity Flying Training Services Limited (together, "the Company").

Our business and suppliers

Affinity currently has a single contract with Ascent Flight Training to provide the fixed wing aircraft required for RAF pilot training under the UK's Ministry of Defence (MoD) Military Flying Training System (MFTS). Our business is therefore predominantly comprised of the initial procurement of aircraft and support equipment, followed by the ongoing procurement of spares, maintenance and overhaul services to meet the requirements of continuing airworthiness. Our services are delivered using three different aircraft types, and consequently, our primary suppliers for both the initial aircraft and ongoing spares and technical support are the three associated OEMs who are based in Germany, Brazil and USA respectively. Other key suppliers are engaged for the overhaul of engines, landing gear and specialist equipment.

Our values & policies

Affinity is committed to conducting its business ethically, with integrity, transparency, and in accordance with all applicable laws. The Company recognises that modern slavery is a crime and a violation of fundamental human rights which takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. As such, Affinity has a zero-tolerance approach to all forms of modern slavery and is committed to implementing and enforcing effective systems and controls to safeguard against any form of modern slavery taking place within its business or its supply chain.

Following an initial assessment in 2018, and our continuing due diligence, Affinity views the risks of modern-slavery and human trafficking in its business and supply chain to be low. Affinity has already enhanced its related policies and procedures which are now incorporated into the Company's Code of Business Conduct and Ethics, Anti-Bribery & Corruption and Whistleblowing policies, in order to ensure that any occurrences of modern slavery or human trafficking are identified and remediated.

Actions taken with continuous improvement

- Affinity has previously written to all key suppliers (identified by spend) to promulgate its policies on modern slavery and human trafficking, requesting evidence of their compliance and subsequent flow down of anti-slavery policies and due diligence. Whilst responses to Affinity's enquiries have been limited, the Company has continued to issue its statements and to follow-up on previous correspondence.
- Procurement processes maintain the Company's zero tolerance approach to modern slavery and this is communicated at the outset of every new business relationship.
- All new suppliers receive the Company's revised Supplier Code of Conduct which requires their compliance with any applicable anti-slavery and human trafficking laws.
- As part of its supplier selection process, Affinity completes a Pre-Qualification Questionnaire for all new suppliers, which includes sections on Anti-Slavery compliance.

- Affinity continues to engage with its suppliers to confirm the implementation of modern slavery policies and due diligence as part of its 3 yearly reviews conducted on all active suppliers.
- Confirmation of compliance with modern slavery regulations is an agenda item for Supplier visits, including any concerns relating to the Supplier's own supply chain.
- Similarly, all Purchase Orders issued during the year include terms and conditions which incorporate compliance with anti-slavery and human trafficking laws, including the Modern Slavery Act 2015.
- A link to the Company's Modern Slavery Transparency Statements has been added to Affinity's website.
- The Company's confidential Whistleblowing service is available for the reporting of any modern slavery concerns by both internal and external parties via the Company's website.
- The Company has signed up to Transparency In Supply Chains (TISC) reporting.
- Annual Code of Business Conduct training is delivered to all employees which will include training on modern slavery awareness and Affinity's related policies and procedures.
- Furthermore, awareness of Affinity's stance on modern slavery, together with a review of the relevant policies, is included in all new employee inductions to ensure that respect for human rights and zero tolerance of modern slavery continues to be embedded throughout the organisation.
- Affinity's recruitment and temporary staff hire policies include checks for anti-slavery compliance.

Affinity continues to recognise the continuously changing nature of modern slavery. The Company will therefore continue to review the level of modern slavery risk in its business and supply chain, and to adapt policies and procedures so that they remain proportionate to the identified risk and the size and operations of the Company.

Board approval

This statement is made for the financial year ending 31st December 2024 and was approved by the respective Boards of Directors on the 26 February 2025.

Signed on behalf of the Boards:



Mr Peter Meffan
Chairman