

MODERN SLAVERY TRANSPARENCY STATEMENT – 2025

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 2025 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’s primary activity is the delivery of fixed-wing aircraft and associated support for the UK Ministry of Defence’s Military Flying Training System (MFTS) under contract with Ascent Flight Training. This includes the procurement of aircraft and support equipment, as well as the continuing purchase of spares, maintenance, overhaul services, and technical support necessary to maintain airworthiness.

Our operations rely on three aircraft platforms, each supported by OEMs located in Germany, Brazil, and the USA. We also work with specialist suppliers for the overhaul of engines, landing gear and mission-critical equipment. Given the nature of aerospace manufacturing and our well-established supply base, Affinity assesses the inherent modern slavery risk within its supply chain as low; however, we remain vigilant and committed to continuous improvement.

Our values & policies

Affinity is committed to conducting business ethically, transparently, and in full compliance with applicable laws and regulations. We recognise modern slavery as a severe violation of human rights that can take many forms, including slavery, servitude, forced labour, and human trafficking.

We maintain a zero-tolerance approach to modern slavery in all its forms and continue to strengthen the systems, controls, and culture that support responsible business conduct. Our stance is embedded in our Code of Business Conduct and Ethics, Anti-Bribery & Corruption Policy, and Whistleblowing Policy, each of which outlines the standards expected from employees and suppliers.

Since our initial risk assessment in 2018, we have continued to enhance our due-diligence framework and supplier oversight processes to ensure that any potential risks are identified, escalated, and addressed.

Actions taken with continuous improvement

During 2025, Affinity continued to take proactive steps to mitigate the risk of modern slavery and human trafficking across our business and supply chain:

- **Supplier communication:** We have written to all major suppliers (identified by spend) to reinforce our modern slavery expectations, share our policies, and request evidence of their compliance and flow-down of requirements to their own supply chains.
 - **Zero-tolerance messaging:** Our procurement processes explicitly reinforce our zero-tolerance approach at the start of all new business relationships.
 - **Supplier Code of Conduct:** All new suppliers receive the updated Supplier Code of Conduct, which requires adherence to applicable anti-slavery and human-trafficking legislation.
 - **Pre-Qualification Questionnaires:** Our supplier onboarding process includes a mandatory PQQ, which contains specific questions relating to anti-slavery compliance and ethical business conduct.
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- **Ongoing supplier engagement:** Modern slavery compliance forms part of our three-yearly review cycle for all active suppliers. We continue to engage with suppliers to confirm their own due-diligence arrangements and risk controls.
- **Supplier visits:** Confirmation of Modern Slavery Act compliance, along with discussion of any supply-chain concerns, is a standard agenda item during supplier visits.
- **Contractual controls:** All Purchase Orders issued by Affinity include terms and conditions requiring compliance with the Modern Slavery Act 2015 and related legislation.
- **Transparency:** A link to our Modern Slavery Transparency Statements is available on the Affinity website.
- **Whistleblowing:** Affinity operates a confidential whistleblowing service accessible via our website for internal and external stakeholders to report concerns, including suspected modern slavery.
- **TISC reporting:** The Company continues to publish its annual statement on the Transparency In Supply Chains (TISC) register.
- **Training and awareness:** All employees undertake annual Code of Business Conduct training, which includes modules on modern slavery awareness and related procedures.
- **Induction programmes:** New employee inductions include training on human rights, ethical conduct, and Affinity's stance on modern slavery to ensure standards are embedded from day one.
- **Recruitment controls:** Our recruitment and temporary staffing policies include appropriate right-to-work checks and due-diligence measures to mitigate the risk of forced labour.

Affinity recognises that modern slavery is a dynamic and evolving risk. We are committed to regularly reviewing our policies, procedures, and risk assessments to ensure they remain proportionate, effective, and aligned with the size and nature of our business operations.

Board approval

This statement is made for the financial year ending 31st December 2025 and was approved by the respective Boards of Directors on the 29th April 2026.

Signed on behalf of the Boards:



Mr Peter Meffan
Chairman
