

Slavery and Human Trafficking Statement

May 2026



NATS

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Introduction

As a responsible business, we are committed to ensuring that modern slavery and human trafficking have no place in our operations or supply chains. We recognise our responsibility to uphold human rights, taking proactive steps to combat these issues and to fully comply with the requirements of the Modern Slavery Act 2015. This, and all future annual statements, will be published on our website at nats.aero as well as being added to the UK Government's Modern Slavery Statement Registry.

This statement covers the financial year ending 31 March 2026, during which time we have undertaken the following activities:

- Completed our annual assessment of the risk of modern slavery within our supply chains
- Collaborated with three other companies in the defence and aerospace sector to deliver a consistent message across the industry as part of Anti-Slavery Week in October 2025
- Raised awareness of the risks of modern slavery with 40 of our key suppliers from around the world as part of our quarterly NATS Supplier Sustainability Forum
- Run awareness training sessions to internal teams.
- Assisted our subsidiaries with assessment of the risk of modern slavery within their supply chains
- Undertaken an internal audit of the processes we have in place to assess and report on the risks of modern slavery within the supply chain

This statement has been approved by the Board of NATS Holdings Limited at its meeting on 21 May. 2026



Martin Rolfe
Chief Executive, NATS

About us: Our organisation, structure, and supply chains

We are the UK's leading provider of air traffic control services. Our purpose is advancing aviation and keeping the skies safe. Each year we handle around 2.5 million flights and over 300 million passengers travelling in UK airspace.

Our organisation is a public private partnership between the Airline Group, which holds 42%, NATS staff who hold 5%, UK airport operator LHR Airports Limited with 4%, and the Government which holds 49% (the golden share). The Airline Group comprises: USS, British Airways PLC, Pension Protection Fund, easyJet Airline Company Limited, Virgin Atlantic Airways Limited, Deutsche Lufthansa AG and TUI Airways.

We generate income from Air Traffic Control (ATC) and related services in the UK and overseas, mainly through NATS En Route (NERL) and NATS Services Ltd (NSL). NERL is our main business and accounts for 81% of the group's revenue. It is the sole provider of ATC services for aircraft flying en-route in UK airspace and the eastern part of the North Atlantic. NERL operates through a licence granted under the Transport Act 2000 as amended by the Air Traffic Management and Unmanned Aircraft Act 2021 and is economically and safety regulated by the Civil Aviation Authority (CAA). The CAA also sets targets and provides incentives for service and also environmental performance. NSL is the commercial arm of NATS and operates in contestable markets, servicing both UK and international customers. Together with its subsidiaries, NSL accounts for 19% of the Group's revenue.

NATS Group companies are shown below, and the definition 'NATS' used herewith includes the following legal entities:

NATS Holdings Limited	NATS Limited	NATS (En Route) PLC
NATS (Services) Limited	NATS Solutions Limited	NATSNV Limited
National Air Traffic Services Limited	NATS Aviation Services DWC-LLC	NATS (USA) Inc
NATS Services (Hong Kong) Limited	NATS Services (Asia Pacific) Pte Limited	NATS Services (India) LLP
NATS (Services) Canada Inc	Searidge Technologies Inc	

We have around 4,900 employees working across our companies; that includes 1,800 Air Traffic Controllers, 700 Air Traffic Service Assistants, 1,000 engineers, and 1,400 other specialists.

We value diversity and strive to create a positive and friendly working environment where everybody is encouraged to make the most of their potential.

Further information on our business is available on our website www.nats.aero.

Where we source from

Our supply chains consist of approximately 1,000 approved suppliers, with around 80% of our spend being with 40 organisations. Our suppliers primarily provide us with the technology we require to undertake our air navigation service provision, as well as the facilities, logistics and support personnel required to run our business.

The nature of aviation and air traffic means we have a number of suppliers with whom we have long term relationships, the most critical of which we manage under the ISO44001 Collaborative Business Relationships standard.

Our activities, and those of our tier 1 suppliers, are predominantly not within high-risk sectors. Where limited areas of elevated risk exist (for example, construction or manufacturing) we look to work with organisations who have published modern slavery statements or have relevant policies in place.

Over 90% of our spend is with suppliers who are located within the top ten countries identified by the Global Slavery Index as having governments taking the most action to combat modern slavery.

Our Policies

We regularly review our internal policies to ensure that they reflect best practice and comply with legislation in the countries in which we operate. The policies we have in place include:

- an anti-slavery and human trafficking policy,
- a responsible business policy,
- a company-wide code of ethics and professional behaviours,
- comprehensive HR and recruitment policies,
- a code of conduct covering all employees,
- a whistleblowing policy open to all employees and third parties, including customers and suppliers, and
- extensive supply chain governance, policies and procedures.

Compliance with the above is monitored by senior management and we provide an independent whistleblowing hotline to which employees and third parties can report concerns or suspicions. This facility is advertised so that employees and third parties are aware of it. We have not received any complaints about modern slavery through our whistleblowing line.

We also adopt an open and collaborative approach with the recognised trades unions representing our staff, and aim to adopt the highest standards in recruitment, both of permanent employees and temporary workers.

Our Due Diligence Processes

All new suppliers are subject to appropriate due diligence prior to trading with us. Since 2015 we have been utilising the aviation and defence industry-wide supplier assurance questionnaire, JOSCAR, to inform our due diligence assessments. JOSCAR is an information portal that requires suppliers to provide information on their compliance with a range of legislation, including compliance with the Modern Slavery Act. Once onboarded, we use a range of online monitoring tools to maintain due diligence surveillance on our suppliers.

Our Risk Management and Assessment

In addition to our normal supplier due diligence processes, we also undertake an annual risk assessment specifically in relation to modern slavery and human trafficking. The risk assessment and assurance processes are undertaken in line with Home Office guidance that recommends suppliers are assessed according to:

1. the countries in which they operate (referring to the Global Slavery Index to determine the list of the countries where slavery is most widespread); and
2. the market sectors in which they operate.

Findings are reported to, and reviewed by, an annual Executive-led Oversight Forum, where membership includes our General Counsel, HR Director, and Supply Chain Director.

Our Approach to Training

Appropriate training is provided to relevant staff when they first join the company and every two years thereafter. Our computer-based training package on modern slavery is undertaken by staff who work closely with suppliers, including Supply Chain Managers, Project Managers, and Contract Managers.

In the period covered by this report, we have reviewed and updated our computer based training package, incorporating up to date statistics and best practice.

KPIs and Effectiveness

Higher-Risk Suppliers	Number of suppliers identified as having a potentially elevated-risk by either geographical area or industry sector	201 (18% of all suppliers)
	Number of suppliers identified as having a potentially elevated-risk who do not have a suitable modern slavery policy in place	9
	Total spend with suppliers identified as higher-risk who do not have a suitable modern slavery policy in place	£840,388 (0.3% of total spend)
Sampling audit	Number of lower-risk suppliers sampled in line with HMG Guidance	83 (7% of all suppliers)
	Number of lower-risk suppliers sampled of concern	0
Reported issues	Number of reports to the Whistleblowing hotline relating to modern slavery or human trafficking	0
Training Completion	Number of relevant employees who have completed training relating to risks of modern slavery risk	459 (91% of relevant employees)
Senior Accountability	Annual Executive led review of modern slavery risks and actions held	<i>Oversight Group held on 28 April 2026</i>
	Annual Board review and approval of Group Modern Slavery Statement	<i>Approved at Board meeting held 21 May 2026</i>

Being a service business, our risk assessment of March 2026 confirmed that our first-tier suppliers are low risk, and that 87% of our current suppliers, and over 90% of spend is with suppliers who are based within the top ten countries identified by the Global Slavery Index as having governments taking the most action to combat modern slavery.

In the period up to the date of this statement (May 2026), we are not aware of any slavery or human trafficking taking place in our business or supply chain.