Modern Slavery Statement

Modern Slavery and Human Trafficking Statement

Issued on behalf of Chapman Freeborn Holdings Ltd, Chapman Freeborn International Ltd, Chapman Freeborn Airchartering Ltd and Magma Aviation Ltd (collectively, the "CF Entities")

2nd October 2023

Introduction

This statement is issued on behalf of the CF Entities in accordance with the requirements of the United Kingdom's Modern Slavery Act 2015.

The CF Entities continue to recognise that modern slavery is an international issue that forces vulnerable people to work illegally against their will.

We have reviewed our existing commercial activities and processes to determine what preventative measures already exist, and what further measures may be required to support the prevention of slavery and human trafficking taking place in any part of our business or supply chains.

We are committed to acting ethically and with integrity in all our business relationships and aim to ensure that our employees, subcontractors and suppliers understand our commitment to human rights and are able to identify and report indications of exploitation. We expect all those companies who have, or seek to have, a business relationship with us to act at all times in a way, which is consistent with our anti-slavery values.

Our Business

CF Entities are primarily engaged in the arrangement of cargo and passenger aircraft charters, freight air transportation, together with the provision, and arrangement of, aviation support services. In the cargo market, CF Entities specialise in arranging charters and leases of aircraft for a wide ranging client base including freight forwarders, multinational corporations, governments and humanitarian agencies. Our passenger charter activities service the air travel

requirements of multinational corporations, HNWIs, travel industry partners and leading names from the entertainment business.

Our Suppliers

Our supplier network consists predominantly of commercial aircraft operators engaged in the transportation by air of passengers and/or cargo, together with other aviation support services providers, as well as overland and sea transportation companies. The majority of these suppliers are engaged on a short term, transaction specific, basis.

We will not knowingly conduct business with anyone engaged in modern slavery or human trafficking or knowingly permit such conduct to be carried out in any of our supply chains.

We have adopted a risk-based approach to the assessment of our business and supply chain, taking geographical, industry, regulatory and market factors into account in order to identify whether there are in fact categories of supply that present a higher risk of modern slavery being present.

To date, there have been no reported instances of concerns regarding modern slavery within our businesses or supplier network.

Responsibility

Responsibility for the CF Entities' anti-slavery initiatives is as follows:

- **Statement:** The Modern Slavery Statement is updated annually by key personnel and has been approved by the Board of Directors of CFH;
- **Supplier sourcing/due diligence:** assessment of slavery and trafficking risk as part of supplier due diligence enquiries. Our Compliance and Legal Departments are responsible for developing and managing our due diligence and contracting processes in this regard, and work in conjunction with our Human Resources Department in the rollout of such processes to our employees. Modern slavery is part of the searches the Compliance department investigates during the onboarding process of counterparties.
- **Training:** An internal, internet based, training programme has been implemented for all employees. This training is intended to raise awareness and to include identification of modern slavery risks in the supply chain and to promote further transparency and improvements in managing these risks. In addition, an annual reminder is issued to

employees concerning modern slavery. Further training is organized by the Compliance Department with our colleagues to ensure awareness of the risks and prevent engagement with counterparts who do not comply with legal regulations or our group's policies.

Relevant Policies and Employee Handbook

The CF Entities operate the following relevant policies:

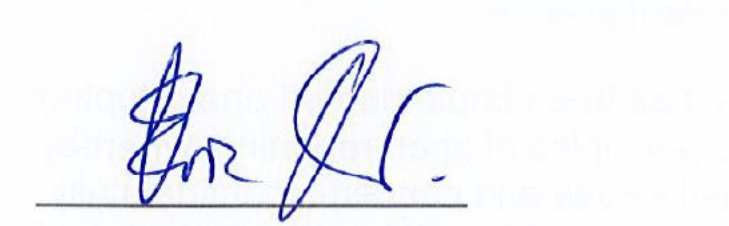
- **Whistleblowing Policy:** this policy has been implemented and adopted by all CF Entities and reinforces the principles of open reporting, whereby employees are able to raise potential issues and concerns confidentially, for thorough investigation and appropriate actions. This policy is designed to encourage reporting of concerns related to the direct activities of, or the supply chains of, the CF Entities. A secure reporting tool Trust-line, which is available on all our websites, has been created to encourage everyone in the group to report any suspected or illegal acts, without concerns of retaliation.
- **Onboarding and Due Diligence Procedure:** modern slavery is a red flag that is searched for against adverse media during the due diligence process when onboarding third parties. This is part of the measures implemented through the Anti-Money Laundering and Counter Terrorist Financing Policy, adopted by all CF Entities.
- **Anti-Bribery and Anti-Corruption (ABC) and Fraud Policies:** these policies have been adopted by all CF Entities to identify and condemn practices and actions originating from bribery, corruption and fraud schemes. These are red flags that may point to indirect involvements and support of modern slavery and human trafficking.

Continuous Improvement

We will continue to review, develop and promote our policies and practices to identify and mitigate risk areas for modern slavery and human trafficking in our business and supply chains. Specifically, we are currently working with our ultimate parent company to adopt a group-wide freestanding and specific policy with respect to modern slavery and human trafficking and further enhance our supplier due diligence enquiries in this area.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, has been approved by the Board of Directors of CFH and will be reviewed and updated annually.



Eric Erbacher

Group Chief Executive Director

Chapman Freeborn Group