Human Rights and Modern Slavery Statement

Issued on behalf of Chapman Freeborn Holdings Ltd, including but not limited to its UK based subsidiaries Chapman Freeborn International Ltd, Chapman Freeborn Airchartering Ltd and Magma Aviation Ltd, Intradco Cargo Services Ltd (collectively, the "Chapman Freeborn Group")

1 August 2024

Introduction

This statement ('the Statement') is issued on behalf of Chapman Freeborn Group responding to the requirements of the United Kingdom's Modern Slavery Act 2015, for the financial year ending on 31 December 2023. The full list of entities covered by the Statement can be found in Appendix 1.

Since publishing its first Modern Slavery Statement, Chapman Freeborn Group has increased transparency each year about its approach to human rights and modern slavery whilst also ensuring this approach continues to develop.

Human rights abuses and modern slavery in all its forms are unacceptable to the group. It therefore has a responsibility to both understand and reduce human rights risk within its businesses and supply chain. The group is fully committed to upholding compliance with all applicable laws across all the regions and countries we engage in. Where national law and international human rights standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honour the principles of internationally recognised human rights. Our commitment is based on the following international Human Rights agreements and commitments:

- the Ten Principles of the United Nations (UN) Global Compact;
- the International Bill of Human Rights, which consists of the:
    - Universal Declaration of Human Rights;
    - International Covenant on Economic, Social and Cultural Rights; and
    - International Covenant on Civil and Political Rights;

- the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work and Core Conventions on Labor Standards;
- the OECD Guidelines for Multinational Enterprises;
- the UN Guiding Principles on Business and Human Rights;
- the UN Sustainable Development Goals.

As of 9th April 2024, Chapman Freeborn Group became a subsidiary signatory of the UN Global Compact and expressed our commitment in supporting the ten principles of the United Nations Global Compact on Human Rights, Labour, Environment and Anti-corruption, with the purpose of making them part of our strategy, culture and day-to-day operations of our company.

As a subsidiary signatory we will promote transparency through the reporting of progress against these ten principles, as well as the UN Sustainable Development Goals via our Parent company Avia Solutions Groups Communication on Progress (CoP) as well as their annual ESG Report.

Human rights

Human rights are moral principles and norms for standards of human behaviour and are regularly protected in law. Every human being is entitled to human rights, without discrimination and regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.

Modern slavery

Modern slavery is a violation of human rights, which involves the slavery of people, prevents the right to freedom of movement, and causes other rights violations. The definition of modern slavery is broad and includes forced labour, servitude, slavery, human trafficking, debt bondage, forced or servile marriage, descent-based slavery, and child labour.

Our workforce

At 31 March 2024, Chapman Freeborn Group had 448 direct employees who work across all our offices globally. 33% were based in the United Kingdom. Regionally, the spread consisted of 64% in Europe, 14% in the Americas, 13% in the IMEA region and 9% in the APAC.

Given the nature of Chapman Freeborn Group's business and operations, the workforce is almost entirely office based with employment terms and conditions to match.

We are committed to acting ethically and with integrity in all our business relationships and aim to ensure that our employees, contingent workforce and supply chain 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 Recruitment and Employment

Chapman Freeborn Group has presence on all continents and recruits staff in multiple jurisdictions. Our internal HR processes and governance amongst many endeavours, ensure that we:

- Conduct all checks necessary including 'right to work' documentation;

- Pay at least minimum wages; and

- All payroll is made through bank transfers to the individual and not third parties.

Our Business

Chapman Freeborn Group is 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, Chapman Freeborn specialises in arranging charters and leases of aircraft for a wide ranging client base including freight forwarders, multinational corporations, governments and humanitarian agencies. Chapman Freeborn's 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. 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 or human rights within our businesses or supplier network.

Our Responsibility

Responsibility for the' 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 Chapman Freeborn Holdings Limited;
- **Supplier sourcing/due diligence:** assessment of slavery and trafficking risk as part of supplier due diligence process during onboarding. 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 and human rights infringements are 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.

Our Policies

The Chapman Freeborn Group operates the following relevant policies:

- **Human Rights Statement Policy:** this policy represents a robust reinforcement of our management's and employees' unwavering commitment to uphold human rights in a reasonable and lawful manner.
- **Environmental Social and Governance Statement and Policy:** these reinforce the group's commitment and position the company towards greater sustainable and social growth.
- **Supplier Code of Conduct:** the code enshrines our group's values and commitments throughout our supply chain.
- **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 the group.
- **Anti-Bribery and Anti-Corruption (ABC) and Fraud Policies:** these policies have been adopted by the organisation 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.
- **Whistleblowing Policy:** this policy has been implemented and adopted by the group 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 group. A secure reporting tool Trust-line (trustline - Home (integrityline.com)), 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.

Furthermore, Chapman Freeborn Group operates the following related policies:

- **Sales and Procurement Policies:** these policies have been adopted at group level and place sustainability and Environmental,

Social and Governance ('ESG') considerations as prime considerations in business undertakings by the group.

- **Governance Policy:** the framework ensures the commitments and values are upheld at all levels of the organization.

Our Performance Indicators

Chapman Freeborn Group monitors the effectiveness of our values and commitments by assessing:

- The responses to our Supplier Code of Conduct,
- Any reports of wrongdoing through any channels,
- The trainings completion rates of our organization, and
- An annual review of our policies and this statement.

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.

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 Chapman Freeborn Holdings and will be reviewed and updated annually.

Eric Erbacher

Chief Executive Officer

Chapman Freeborn Group

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The Global Aircraft Charter Specialists

Appendix 1: List of Chapman Freeborn Group entities

ALLTRANS MANAGEMENT PTY LTD
CHAPMAN FREEBORN AIRCHARTERING BV
INTRADCO GLOBAL LIMITED
CHAPMAN FREEBORN AIRCHARTERING CONSULTING (SHANGHAI) CO LTD
CHAPMAN FREEBORN OBC GmbH
CHAPMAN FREEBORN AIRMARKETING GmbH
ARCUS OBC GmbH
ARCUS AIR LOGISTIC GmbH
CHAPMAN FREEBORN HANDCARRY LIMITED
CHAPMAN FREEBORN AIRCHARTERING PRIVATE LTD
MAGMA AVIATION INTERNATIONAL LIMITED
MAGMA AVIATION GLOBAL SERVICES LIMITED
CHAPMAN FREEBORN AIRCHARTERING SP ZOO
CHAPMAN FREEBORN AVIATION LLC
CHAPMAN FREEBORN AIRCHARTERING PTE LIMITED
ARCUS AIR LOGISTIC SRO
CHAPMAN FREEBORN AIRCHARTERING (SOUTH AFRICA) (PTY) LTD
CHAPMAN FREEBORN AIRCHARTERING SL
ARCUS AIR LOGISTIC IBERICA SLU
CHAPMAN FREEBORN HAVACILIK TASIMACILIK TICARET LIMITED SIKRETI (dormant)
CHAPMAN FREEBORN AVIATION SERVICES DMCC
INTRADCO CARGO SERVICES DMCC
MAGMA AVIATION DMCC
INTRADCO CARGO SERVICES LIMITED
MAGMA AVIATION LIMITED
WINGS 24 LIMITED (dormant)
ZEUSBOND LIMITED
CHAPMAN FREEBORN AIRCHARTERING LIMITED
CHAPMAN FREEBORN INTERNATIONAL LIMITED
CHAPMAN FREEBORN AIRCHARTERING (CHINA) LIMITED
CF COURIERS LLC
CHAPMAN FREEBORN OBC INC
CHAPMAN FREEBORN AIRCHARTERING INC
INTRADCO GLOBAL INC