



MODERN SLAVERY ACT COMPLIANCE REVIEW, POLICY AND WEBSITE STATEMENT

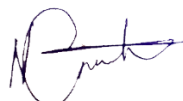
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AUTHORISATION

The table below is a record of the approval of this document.

Role	Name	Date	Evidence/Signature
Author	Nigel Cranston, Senior Commercial Manager	03/07/24	
Contributor	Kate Todd, Head of Human Resource	15/07/24	
Contributor	Cindy Knight, Head of Procurement	03/07/24	
Authoriser	Sophie Thomas, Chief Commercial Officer	15/07/24	
Approver	Michael Stoller, CEO	16/07/2024	
Circulation & Acknowledgement	Aquila Board		
Authoriser	Controlled in AQUILA SharePoint.		

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The table below is a record of all the changes made to this document.

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3.0	April 2019	Annual Review	As above
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6.0	February 2022	Annual Review	As above
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REFERENCE DOCUMENTS

Ref	Document Reference	Issue	Issued By	Document Title
[Ref. 1]				
[Ref. 2]				
[Ref. 3]				
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NOTE 1: This document does not reference any external documents.

GLOSSARY

Acronym.	Definition
ATM	Air Traffic Management
CSR	Corporate and Social Responsibility
KPI	Key Performance Indicator
LRQA	Lloyds Register Quality Assurance
MOD	Ministry of Defence
UK	United Kingdom

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1 ANNUAL REVIEW STATEMENT FINANCIAL YEAR ENDING MARCH 2023

1.1 OVERVIEW

(1) Aquila Air Traffic Management Services Limited (Aquila) has undertaken its annual review of what the Modern Slavery Act 2015 (the **Act**) means practically to our business, and to understand how the Act may manifest itself within our Supply Chain and Human Resource activities. This document summarises the business's review of the period and includes our policy which has been updated to reflect continued activity in the prevention of slavery or human trafficking.

(2) In 2024 and beyond, Aquila remains committed to ensuring that slavery or human trafficking does not happen in any part of its business – including in the supply chain. This includes proactive steps to avoid these happening as well as processes which enable Aquila to take swift and robust action in the event that any evidence relating to slavery or human trafficking in our supply chain is identified.

(3) The Aquila executive team assesses that the key risk area of encountering modern slavery for Aquila lies where Aquila does not have direct management control i.e. within our Supply Chain, particularly tier 2 and 3 suppliers in the supply chain.

(4) Aquila is a Joint Venture owned 50:50 by NATS and Thales UK. One of the key benefits of ownership is the ability to replicate the levels of engagement, due diligence and audit for suppliers, where Aquila are audited regularly against ISO9001 accreditation, Lloyds Register Quality Assurance (LRQA), and the parent companies periodically for compliance against acceptable standards, including Corporate and Social Responsibility (CSR) compliance.

(5) Aquila has reviewed its Modern Slavery Policy (Annex 1) in accordance with the 2015 Act and the statement that must appear on our external website. The statement for 2024 appears as Annex 2 to this document.

1.1 SUPPLY CHAIN

- (1) Aquila remains committed to procuring goods and services from suppliers that demonstrate ethical principles in the way they conduct their business, and we engage with suppliers on standards of quality, safety, environmental responsibility and human rights. Aquila continues to review our contracted suppliers to verify supply chain visibility and CSR compliance.
- (2) To ensure that the companies who are suppliers to Aquila are operating in an ethical and responsible manner suppliers are required to demonstrate CSR compliance which includes a requirement that they shall not use any form of slave, child labour, bonded, forced, involuntary prison labour or engage in human trafficking or exploitation. Aquila has worked collaboratively with suppliers to improve supply chain standards.
- (3) Aquila continues to review existing supplier contracts and behaviours, including smaller or ad-hoc contracts, to ensure anti-slavery and human trafficking are adequate. We work collaboratively with our suppliers to raise CSR awareness, audit findings and focus on continual improvement with the suppliers further down the supply chain.

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- (4) Before Aquila sets up any new relationship with a potential supplier, checks are always undertaken to make sure their values align to ours in the context of this policy. These checks cover a broad range of policy areas including CSR compliance, accessibility, and pre-employment vetting.
- (5) Being signed up to JOSCAR as a Buyer, Aquila are provided with annually updated and validated statements from registered suppliers regarding their compliance with Modern Slavery legislation and their policies. Where suppliers are not registered in JOSCAR we work directly with suppliers to obtain the same level of assurances. Where we believe a supplier may be at risk Aquila undertakes further due diligence to obtain assurance or support any corrective actions to that the supplier has reached Aquila's required standards. This confirms that suppliers are aware of the Act and have processes in place to prevent modern slavery.
- (6) In reviewing the policy for 2023/24, Aquila has no current major concerns around the supply chain's working practices. Reviewing performance over the past 12 months demonstrates that Aquila's suppliers have a good awareness of the dangers of modern slavery.

1.2 RESOURCING

- (1) Aquila continues to have a carefully controlled resource supply strategy which is made up of the:
 - Recruitment of permanent Aquila resources: managed by Thales HR and one carefully chosen employment agent;
 - Recruitment of contingent resources: a small number of recruitment agencies have been introduced to improve the reactivity of the business and increase the pool of candidates to join the business; and
 - Recruitment of Seconddees: managed by either NATS or Thales HR departments depending on the Seconddee's employer.
- (2) Aquila's processes require suppliers of contingent resources to ensure all employment statutory checks are undertaken within the supply chain. Subcontracts with contingent worker agencies follow the same policy and are reviewed against legislative compliance, including compliance with the Act, to identify any areas in which these suppliers are non-compliant.
- (3) All new employees are processed and documented through the Human Resources system, Workday. In all cases, Aquila verifies an employee's right to work in the United Kingdom before they are actively engaged in meaningful employment.

Table 1 2022/23 Key Performance Indicators – Modern Slavery:

Area	Measure	Events in 2022/23
Supply Chain	215 suppliers used to supply goods and services during 2023/24. Our top 10 suppliers provided 78% of goods and services. This provides context regarding the weighting of risk within our supply chain. As with all suppliers, these suppliers are requested to confirm any instances of non-conformance within their own supply chains. With Aquila being part of the JOSCAR Buyer community since 2022, this provides an additional source of supplier compliance data. 86% of Aquila's supplier spend in 2023/24 was with suppliers that confirm in the JOSCAR platform that they comply with national or international modern slavery guidelines into their organisations policies. Aquila received goods and services from 8 countries outside of the UK, namely USA, Austria, Cyprus, Germany, Italy, Norway, Belgium and France. Depending on materiality the suppliers from these countries are requested to provide data and information that underpins Aquila's compliance with the Act. Non-UK suppliers accounted for 5% (in value) of the goods & services Aquila procured. Overseas suppliers are requested to provide data and information that enables Aquila to be compliant with the Act.	Audits carried out by our suppliers confirm there have been Zero recorded instances during this period.
Aquila resourcing	53 permanent recruitments and 8 fixed term recruitments completed; 24 contingent workers delivered services.	Zero modern slavery events noted in this period
Employee engagement and awareness	Each year Aquila provides to all staff (be they permanent, contingent or secondees) the business standards relating to Ethical Behaviour and associated policies, this includes any changes to Aquila's approach to the Modern Slavery Act.	Zero modern slavery events noted in this period
Legal Compliance	The Ethics Committee of Aquila noted no evidence of modern slavery in its annual review in December 2023.	Zero modern slavery events noted in this period

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ANNEX 1 – MODERN SLAVERY POLICY

X.1.1 AIMS OF THIS POLICY

- (1) This policy supports our commitment to eradicating the risk of modern slavery that may occur within our business or infiltrate our supply chains or any other business relationship.
- (2) The policy applies to all persons working for or on behalf of Aquila in any capacity, including employees, directors, officers, agency workers, contractors, consultants, volunteers and any other third-party representative.
- (3) We expect all who have, or seek to have, a business relationship with the company to familiarise themselves with this policy and to act, at all times, in a way that is consistent with its values.

X.1.2 INTRODUCTION

- (1) Modern Slavery is an international crime, affecting an estimated 29.8 million adults and children around the world. It is a global problem that transcends age, gender and ethnicities.
- (2) Slavery is not an issue confined to history, nor is it a problem that only exists in certain countries. It is an abhorrent practice that is being perpetrated all around the world today and regrettably the UK is no exception, as is all too often evidenced in the media. In the UK today people (be they victims that have been brought in from overseas or vulnerable members of society) are being forced to illegally work against their will in many different sectors.
- (3) This statement sets out the Aquila Air Traffic Management Services Limited (Aquila) approach to understanding all potential modern slavery risks related to our business and identifies how the company intends to ensure that there is no slavery or human trafficking in either Aquila or its supply chain. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.
- (4) As an integral part of the provision of services and assets to Ministry of Defence (MOD) Air Traffic Management (ATM) Service Provision, Aquila acknowledges its responsibility to take a zero-tolerance approach to slavery and human trafficking in accordance with legislation. As a result, Aquila has taken a number of steps, such as putting in place a supply chain and human resources processes and policies, which incorporate preventive measures to remove the risk of trafficking across the business.
- (5) Aquila is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring, as far as is practicable, that its supply chain is also free from slavery and human trafficking.

X.1.3 THE BASIC PRINCIPLES OF THE MODERN SLAVERY ACT 2015

- (1) Modern Slavery is defined in the Modern Slavery Act 2015 (the **Act**). Essentially it is any conduct that constitutes the offences of Slavery (where ownership is exercised over a person); Servitude (the obligation to provide services imposed by coercion); Forced or Compulsory Labour (work or service exacted from any person under the menace of a penalty and for which the person has not offered him/herself voluntarily) and Human Trafficking (arranging or facilitating the travel

of another with a view to exploiting him/her) or would constitute an offence if the conduct took place in the UK.

X.1.4 POLICY SCOPE

(1) This Policy covers the activities of Aquila as follows:

- Provision of military ATM capability at all MOD-operated Marshall airfields and flying ranges in the UK and overseas;
- Provisioning of services to the UK Windfarm Industry; and
- Provision of critical services associated with ATM and other safety critical systems to other UK and overseas customers in both civil and public sectors.

(2) Aquila is contracted to supply goods and services in the UK, Gibraltar, Cyprus, Ascension Island and the Falkland Islands on behalf of the MOD and others.

(3) Aquila has assessed the services and activities in the UK and overseas and considers its activities to be very low risk in relation to slavery or human trafficking. In reaching this conclusion Aquila has assessed both its own practices and the practices of its suppliers through the supplier engagement process and on-going supplier reviews throughout the lifetime of their engagement.

X.1.5 HOW AQUILA EMPLOYEES CAN REPORT POTENTIAL SLAVERY OR HUMAN TRAFFICKING ISSUES

(1) Should an Aquila employee have a reasonable belief that an individual working for or engaged in provision of services to Aquila may be involved with slavery or human trafficking, they have a moral and legal duty to take appropriate action and report their concerns via one or more of the following routes:

- Report the matter to their line manager; or
- Report via the 'Report it' button on the internal Signals home page
- Make a disclosure in accordance with the Aquila Whistleblowing policy; or
- Contact the modern slavery helpline on 0800 0121 700; or
- Contact the police; or
- Make an online disclosure: <https://modernslavery.co.uk/>

X.1.6 HOW AQUILA COMPLIES WITH THE ACT

(1) To ensure Aquila prevents modern slavery activities within its own business, and those of its suppliers, it has various policies in place which include measures to prevent such practices such as the:

- Promotion of fair employment practices;
- Provision fair and competitive wages; and
- Prevention of harassment, bullying, and discrimination, the use of child or forced labour or trafficking in persons for any purpose.

(2) In particular, Aquila operates the following policies and health checks (that comply with industry and best practice standards and include due diligence activities at the point of engagement with suppliers):

X.1.6.1 Whistleblowing:

(1) Our Whistleblowing Policy encourages all its workers to report instances where they suspect practices that are of concern. The Aquila Whistleblowing policy is designed to make it easy for workers to make disclosures without fear of

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recrimination. In the past year one such event, not relating to Modern Slavery, has occurred and been thoroughly investigated.

- (2) Our customer, the Ministry of Defence, as a public body is obliged under the Act to highlight to us directly any practices, they suspect may have human trafficking connotations for Aquila. Other business partners are required to notify Aquila of any modern slavery risks or breaches in accordance with our supply chain contracts, supply chain policy, ISO90001, Environmental plans, and under the requirements of the Public Interest Disclosure Act (PIDA).

X.1.6.2 Employee code of conduct:

- (1) Aquila's Employee Code of Conduct makes clear to employees the actions and behaviours expected of them when representing the organisation. Aquila strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK or abroad and when managing its supply chain.

X.1.6.3 Recruitment:

- (1) Aquila uses only reputable employment agencies to source labour and always verifies the practices of any new agency it may use before accepting workers from that agency. The resourcing partners are obliged to adhere to the Aquila Resourcing policy which is regularly reviewed to for compliance with the Act. Aquila have a primary agreement in place with recruitment agency Copello where 95% of current recruitment is undertaken.

X.1.6.4 Supplier Conduct requirements:

- (1) Aquila continually reviews the Supply Chain procurement policies it uses to assess suppliers and potential suppliers in order to identify and prevent modern slavery or human trafficking.
- (2) In addition, Aquila's organisational structure is set up to ensure pro-active anti-slavery and human trafficking initiatives with the continual improvement of policies, investigations/due diligence and awareness raising programme detailed in the following three paragraphs.

X.1.6.5 Continual improvement of Policies:

- (1) Aquila Human Resources is responsible for monitoring and updating policies in relation to the Act on an annual basis.

X.1.6.6 Investigations/Due Diligence:

- (1) For internal issues, Aquila has an established policy and procedure for just and fair independent investigation.
- (2) For supply issues, the Aquila procurement department is responsible for investigations and due diligence in relation to any suspected instances of slavery or human trafficking within the supply chain. Aquila undertakes due diligence in the tender process when considering taking on new suppliers and regularly reviews its existing suppliers. Aquila's due diligence and reviews include:
 - Ensuring suppliers are contracted to the appropriate commercial governance that requires compliance to legislation for the Act;
 - Regular Audits through the supply chain on compliance to the Act;
 - Evaluating the modern slavery and human trafficking risks of any new supplier;

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- Conducting supplier audits or assessments through Aquila's own staff or a third-party auditor including ISO9001 auditing;
 - Using details of ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- (3) A system for reviewing its existing supply chain which is in place whereby Aquila re-evaluates all existing suppliers at least annually.

X.1.6.7 Breaches of this policy

- (1) The breach of this Modern Slavery policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.
- (2) Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.
- (3) If any part of this policy is unclear, clarification should be sought from Supply Chain or Human Resources.

X.1.6.8 Status of this policy

- (1) This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

X.1.6.9 Board Member approval

- (1) The statement in Annex 2 has been approved by Aquila's Board of Directors who will review and update it annually.

ANNEX 2 – MODERN SLAVERY STATEMENT FOR EXTERNAL WEBSITE

X.2.1 INTRODUCTION

- (1) This is Air Traffic Management Services Limited's (Aquila) slavery and human trafficking statement for the financial ending 31 March 2024, pursuant to the Modern Slavery Act 2015.
- (2) Aquila fully supports the principles of the UK Modern Slavery Act of 2015 (Modern Slavery Act) and we are absolutely committed to preventing slavery and human trafficking in our corporate activities and through our supply chains.
- (3) As an integral part of the provision of services and assets to Ministry of Defence (MOD) Air Traffic Management (ATM) Service Provision, we acknowledge our responsibility to take a zero-tolerance approach to slavery and human trafficking.
- (4) We continue to implement this approach by adhering to our internal and supply chain practices and policies which incorporate within them appropriate preventive measures.

X.2.2 BUSINESS STRUCTURE AND SUPPLY CHAINS

X.2.2.1 Aquila's Business Scope

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- (1) Aquila is a joint venture owned 50:50 by NATS and Thales UK.
- (2) We have approximately 344 staff, most of whom are based in the United Kingdom. More than 99% of our staff are directly employed with the remainder seconded from NATS or Thales UK. They are not in the category which is generally seen to be vulnerable to modern slavery, so our focus is mainly to ensure there are suitable policies and procedures in place for our contractors and suppliers.
- (3) We are contracted to supply the Ministry of Defence military ATM capability, goods and services at all MoD-operated airfields and flying ranges in the UK and at permanent RAF bases overseas. The permanent overseas RAF bases are in Gibraltar, Cyprus, Ascension Island and the Falkland Islands.
- (4) We also provide limited military ATM mitigation services to the UK windfarm industry and similar services to other UK companies, as well as support services for other MoD requirements.
- (5) Our customers are required to comply with the Modern Slavery Act and are therefore obliged to highlight any practices they suspect may have human trafficking connotations to us directly.
- (6) Our Ethics Officer is responsible for ensuring compliance with our obligations under the Modern Slavery Act 2015 and with our rules under our Modern Slavery Policy. Compliance is reviewed formally, annually. The Ethics Officer is an additional role held by a member of the executive team reporting directly to our Chief Executive Officer. The current incumbent is the Chief Commercial Officer.

X.2.2.2 Aquila's Supply Chain

- (1) Our supply chain contracted with 215 suppliers of goods and services during 2023/2024.
- (2) Goods and services were received from seven countries outside of the United Kingdom, namely USA, Austria, Belgium, Cyprus, Germany, Italy, Norway and France. These non-UK suppliers accounted for less than 5% of the goods and services we procured.
- (3) Our Supply Chain department engages with our suppliers on all standards of quality, safety, environmental responsibility and human rights. Our Supply Chain department is also responsible for investigations and due diligence in relation to any suspected instances of slavery or human trafficking within the supply chain.
- (4) Our Supply Chain undertakes due diligence in its tender processes when considering taking on new suppliers and regularly reviews our existing suppliers.
- (5) One of the key benefits of our shareholding structure is that we are able to leverage our shareholders' processes, levels of engagement, due diligence and auditing for suppliers.

X.2.2.3 Resourcing of Staff

- (1) We continue to have a carefully controlled single source supply strategy for staff:
 - 95% of Aquila recruitment for permanent staff is conducted through recruitment specialists Copello, we also have access to Thales HR resourcing team;

- A small number of specialist recruiters carry out the recruitment of contractors and temporary staff who undertake sourcing, including statutory employment checks; and
- Our shareholders NATS and Thales HR carry out the recruitment of secondees for their own employees.

(2) In addition to the checks that the resource suppliers are contracted to undertake, we also verify for ourselves an employee's right to work in the United Kingdom before they are actively engaged in meaningful employment whether on a temporary or permanent basis – this is also necessary for security clearances.

(3) Once an employment offer is made, all new employees are processed and documented by Thales HR using an online Human Resources Information System tool called 'Workday'.

X.2.2.4 Internal Aquila Policies

- (1) To ensure we minimise the risk of modern slavery activities within our own business and our supply chain, we have policies and practices that:
 - Promote fair employment practices;
 - Promote fair and competitive wages; and
 - Prevent harassment, bullying, discrimination, the use of child or force labour or trafficking people for any purpose.
- (2) All of the following policies have been signed off by the Board of Directors:
 - **Modern Slavery Act policy:** which is reviewed annually and sets out a list of initiatives that we have already implemented to meet and maintain the principles of the Modern Slavery Act;
 - **Fair employment practices:** covering flexible working, maternity leave, and performance reviews;
 - **Prevention of harassment, bullying, and discrimination:** policy on anti-harassment and bullying and disciplinary and grievance procedures;
 - **Whistleblowing policy:** designed to enable employees to make disclosures without fear of recrimination;
 - **Code of conduct and Ethics policy:** both clarifying the high standard of actions and behaviours expected of employees when representing the organisation; and
 - **Recruitment policy:** we have a Primary Resource Partnering Agreement with recruitment agency Copello who undertake 95% of our recruitment.
- (3) We continue to make our staff aware that breach of the Modern Slavery Policy may lead to disciplinary action and serious breaches may lead to immediate dismissal.

ANNEX 3 - DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

- (1) As a business we are audited annually against ISO9001 accreditation by Lloyds Register Quality Assurance, and for compliance against other standards.
- (2) Before we set up any new relationship with potential suppliers, we always undertake checks to make sure the potential supplies values align with ours in the context of modern slavery.
- (3) Our Supply Chain department is responsible for assessing the information submitted by suppliers and always carries out a risk assessment specifically focused on modern slavery.
- (4) Should a supplier fail to provide the information requested or to meet our expectations, we will take appropriate action, which may include not entering into a relationship or terminating the relationship with the supplier concerned. In the first instance we would seek to work with the supplier to identify the issues and remedy the situation.
- (5) We utilise a Pre-Qualification Questionnaire or JOSCAR which directly addresses a prospective supplier's approach to modern slavery. As part of the questionnaire our prospective suppliers are required to demonstrate that they will not use any form of slave, bonded, forced, involuntary or prison labour nor engage in human trafficking or exploitation.
- (6) During the term of the contract, we continue to monitor each supplier in our supply chain and carry out audits of our supply chain.
- (7) Each year we revalidate our key suppliers either through JOSCAR or asking specifically if they can:
 - Reconfirm their adherence with the UK Modern Slavery Act 2015;
 - Advise on what steps they have taken during the past 12 months to minimise any opportunity for Modern Slavery to occur within their Supply Chain; and
 - Confirm whether there have been any breaches of the Modern Slavery Act within their Supply Chain in the previous financial year.
- (8) Where we believe that a supplier may be at risk, we undertake further due diligence as is necessary.

ANNEX 4 - RISK ASSESSMENT AND MANAGEMENT

- (1) Aquila's ongoing risk management process involves identifying any internal and supply chain practices that may unintentionally increase the risk of or permit modern slavery abuses, doing all it can to prevent such abuses, and mitigate and account for any such abuses.
- (2) Aquila continues to review performance for the past 12 months at the end of each financial year and the review for the 2023/24 financial year has given no current major concerns.
- (3) Our top 10 suppliers provide us with 78% of the goods and services we procure.
- (4) Having specifically reviewed our own practices and the practices of these key suppliers, we continue to assess our business and activities to be a very low risk in relation to slavery or human trafficking. For example:

- We do not do business in a high-risk sector;
- We do not do business with countries with questionable human rights reputations;
- We do not have complex employment arrangements; and
- We do not have vulnerable workers.

(5) We manage the risks associated with our procurement process to reduce the potential failures using monthly key performance indicator analysis e.g. cost, quality and delivery risks.

ANNEX 5 - PROGRESS AND EFFECTIVE ACTION TAKEN TO ADDRESS MODERN SLAVERY

- (1) We have not identified any examples of modern slavery or human trafficking in the 2023/24 financial year and we are confident that our suppliers have a good awareness of the dangers of modern slavery.
- (2) We undertook an internal compliance review in January 2023 and the review made no additional recommendations in relation to the Modern Slavery Act.
- (3) We have incorporated an environmental protection eLearning training within our staff training programme.
- (4) We continue to work collaboratively with suppliers to improve our supply chain standards.

ANNEX 6 - TRAINING ON MODERN SLAVERY AND TRAFFICKING

- (1) We continue to raise awareness of modern slavery and human trafficking issues internally throughout the organisation by distributing our modern slavery policy and ensuring our staff understand:
 - The basic principles of the Modern Slavery Act;
 - How employees can identify and prevent slavery and human trafficking;
 - What action employees can take to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
 - What external help is available, for example through the modern slavery helpline or modern slavery website for online disclosure.

ANNEX 7 - CONCLUSION AND LOOKING FORWARD

- (1) Aquila is fully committed to the combat of modern slavery and human trafficking both within our supply chains and in treating our own employees with equality, dignity and respect in accordance with our Ethics Policy.
- (2) We have assessed our services and activities in the UK and overseas and consider our activities to carry a very low risk in relation to slavery or human trafficking. In reaching this conclusion we have assessed both our own practices and the practices of our suppliers; an assessment which will be repeated throughout the lifetime of the business.
- (3) We are confident that we have appropriate measures in relation to our immediate supply chain, but we recognise that further development and refinement will be

required to address all our supply chain risks, particularly at 2nd and 3rd tier levels and in all the countries where we purchase goods and services.

- (4) We will particularly focus on suppliers who have lengthy and complex supply chains as we recognise that they are at higher risk relation to slavery or human trafficking. We continue to review the contractual requirements we have in place for suppliers with complex supply chains to ascertain whether further provisions are required to reduce our supply chain risks.
- (5) We will consider whether additional staff outside our supply chain department should undertake formal training on modern slavery and human trafficking prevention. We will also consider whether to bring in an e-learning course for all our employees to cover modern slavery, which many of our suppliers are already doing with their employees.
- (6) We will continue to report on developments and improvements to our modern slavery programme on an annual basis.

ANNEX 8 - APPROVAL

- (1) This Modern Slavery statement has been approved by the Board of Directors of Aquila in June 2024.
- (2) Signed for and on behalf of the Board of Aquila Air Traffic Management Services Limited.

A handwritten signature in blue ink, appearing to read "M Stoller", is placed over a light blue rectangular background.

Michael Stoller
Aquila Chief Executive Officer
June 2024

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