



ACC AVIATION GROUP MODERN SLAVERY STATEMENT 2021

Reporting on the financial year end 31 December 2021

INTRODUCTION

This statement contains a summary of the measures NEWACC (2018) Limited and its subsidiary companies (ACC Aviation) have taken and continue to take this year to ensure that modern slavery or human trafficking is not taking place within our business or supply chain pursuant to the Modern Slavery Act 2015.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ACC Aviation has a zero-tolerance approach to any form of modern slavery. ACC Aviation is committed to the best corporate practices and ethical values. ACC Aviation undertakes to act ethically and with integrity in all its business dealings and relationships and to take all reasonable measures to require the members of its supply chains to do the same.

ABOUT ACC AVIATION GROUP

NEWACC (2018) Limited is the parent company of; ACC Aviation Group; ACC Aviation Limited; ACC Aviation Inc.; ACC Aviation ME FZCO; FLYACC Group Limited. The Directors of each of these subsidiaries are responsible for ensuring that modern slavery or human trafficking is not taking place within our business or supply chain.

Founded in 2002, ACC Aviation is a global aviation services group that provides worldwide solutions to the aviation industry, commerce, governments and private individuals. Our divisions provide expert service in aircraft wet leasing, aircraft charter, asset management and consultancy.

We deliver market-leading solutions and our peerless service and emphasis on reliability has made us one of the world's fastest-growing and most respected aviation service providers.

OUR SUPPLY CHAIN

The suppliers to our Group primarily consist of airline operators and professional services companies (including, but not limited to, IT, legal, consultants, accounting and recruitment agencies). These are typically supplied to us by large organisations that have their own supply chain principles and ethical standards.

Aviation is a technical, skilled and highly regulated industry. Given the nature of the services we provide, the primary locations in which we operate and the suppliers we use, we believe the overall risk of modern slavery in our supply chain is low.

ORGANISATIONAL POLICIES

ACC Aviation is committed to conducting its business in a highly ethical manner and this policy is included in the training of new and existing staff.

ACC Aviation will only work with suppliers that have high standards of environmental and social responsibility and that, when entering into new business relationships or expanding into new business areas, the same standards of business practice are maintained across the Group through appropriate due diligence checks.

ACC Aviation also aims to ensure all activities are carried out with the proper regard for the health and safety of all those involved in its operations and that of the public.

ACC operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy

- We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employee code of conduct

- Our code of conduct makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.

Recruitment policy

- We use only specified, reputable employment agencies to source employees and always verify the practices of any new agency before accepting any workers from that agency. In recruiting new members of staff, we apply appropriate checks (including the relevant 'right to work' documentation) to ensure that our employees enter freely into employment.

All ACC's policies are reviewed and updated annually and are communicated to all employees and workers across the organisation.

RISKS

ACC believe the overall risk of modern slavery in our supply chain is low. ACC Aviation recruits employees and workers in multiple jurisdictions across the world, some of these countries have increased risks of modern slavery and human trafficking; at all times our recruitment policy is adhered to.

CONTINUOUS IMPROVEMENT

ACC Aviation 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. Online training regarding Modern Slavery was introduced 2021 and its renewal is required yearly. We will review our Modern Slavery Statement annually to discuss any areas or new areas of concern.

Any modern slavery or human trafficking concerns are documented and investigated, and disciplinary actions are taken where required.

Know Your Customer and Know Your Supplier procedures are used when engaging with new customers and suppliers.

TRAINING

All employees and workers of ACC are required to complete all online training and sign the policy to say they have read and understood all policies annually.

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 NEWACC (2018) Limited on the 31st August 2022 will be updated annually in line with the Act's reporting requirements.

Philip Mathews

Philip Mathews
Chief Executive Officer

ACC Aviation Group Modern Slavery Statement reporting on 2021 v1

Final Audit Report

2022-09-01

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