ACC AVIATION MODERN SLAVERY STATEMENT 2023

Reporting on the financial year end 31 December 2023

INTRODUCTION

This statement contains a summary of the measures ACC Aviation as a group ("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. This statement relates to actions and activities during the financial year 1st January 2023 to 31st December 2023.

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

ABOUT ACC AVIATION

ACC Aviation comprises NEWACC (2018) Limited and its subsidiaries ACC Aviation Group Limited; ACC Aviation Limited; ACC Aviation Inc; ACC Aviation ME FZCO. 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 ACC Aviation 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 our business in a highly ethical manner and this philosophy is reflected in our policies and practices and the standards by which we operate.

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

We also ensure all our employees and workers, new and existing are trained in the appropriate policies and procedures and are aware of our commitment to preventing modern slavery.

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 our operations and as well as the public.

ACC Aviation operates 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, workers, customers, and other business partners to report any concerns related to the direct activities we carry out, or our supply chains. 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 employees and workers to make disclosures, without fear of retaliation.

Code of conduct

- Our code of conduct makes clear to employees and anyone else who works for the organisation, the actions and behaviour expected of them when representing ACC Aviation. We strive to maintain the highest standards of conduct and ethical behaviour.

Recruitment policy

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

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

RISKS

We 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; our global recruitment policy is always 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 all employees and workers are required to renew the training annually. We review our Modern Slavery Statement annually to ensure that any areas of concern and/or potential issues are identified and addressed.

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

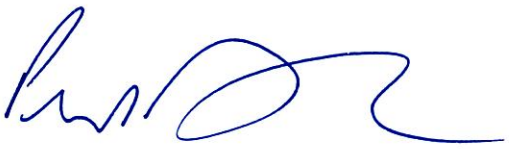
Know Your Customer and Know Your Supplier procedures are used when engaging with new customers and suppliers.

TRAINING

All employees and workers of ACC Aviation are required to complete all online training and sign the policy to say they have read and understood all policies at the start of any period of work with us and on an annual basis where appropriate.

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 27th September 2024 and will be updated annually in line with the Act's reporting requirements.



Philip Mathews
Chief Executive Officer