ACC Aviation Modern Slavery Statement 2025

Reporting on the financial year end 31 December 2025

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 s54(1) of the Modern Slavery Act 2015. This statement relates to actions and activities during the financial year 1st January 2025 to 31st December 2025.

Modern slavery encompasses slavery, servitude, human trafficking and forced or compulsory 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. ACC Aviation operates across international markets through its group companies and provides aviation brokerage and consultancy services to a global client base. 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.

As part of our supplier onboarding and due diligence processes, we consider the nature of the supplier's services, its location and the potential risks associated with the services being provided. Where appropriate, suppliers are required to confirm their commitment to applicable modern slavery and ethical business standards and contractual terms may include requirements relating to ethical conduct and compliance with applicable legislation.

Given the size and nature of ACC Aviation's supply chain, the Group does not currently undertake detailed modern slavery audits of all suppliers. Instead, it takes a proportionate, risk-based approach to supplier due diligence.

ORGANISATIONAL POLICIES AND DUE DILIGENCE

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. We 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.

Ant Bribery Policy

- ACC Aviation is committed to conducting its business fairly, honestly and openly and has a zero-tolerance approach to bribery and corruption. The policy specifically addresses bribery, corruption and tax evasion, these controls support ACC Aviation's wider commitment to ethical business conduct and responsible relationships across its operations and supply chain, including our approach to preventing modern slavery and human trafficking.

Know Your Customer and Know Your Supplier procedures are used when engaging with new customers and suppliers. These processes support the Group's assessment of the legitimacy, nature and potential risks associated with new business relationships.

All ACC Aviation's policies are reviewed and updated annually or bi-annually to ensure they are continually effective and are communicated to all employees and workers across the organisation.

RISKS

ACC Aviation assesses the risk of modern slavery within its own operations and supply chain by considering the nature of the services provided, the jurisdictions in which the Group operates, the nature of its workforce and the types of suppliers and third parties with which it engages.

We believe the overall risk of modern slavery in our supply chain and operations is low reflecting the predominantly professional and office-based nature of its workforce and employees are recruited directly or through established recruitment agencies. ACC Aviation's recruitment processes include checks to establish an individual's right to work and support the principle that employment is entered into freely. However, we recognise that risk may be higher in certain areas of our supply chain and in jurisdictions where modern slavery risks are known to be more prevalent. We ensure our global recruitment policy is always adhered to.

As part of our onboarding of suppliers, we require suppliers to confirm adherence to modern slavery legislation, conduct due diligence on their own supply chains, and agree to contract terms that include ethical conduct clauses.

We encourage incident reporting to either HR or senior managers within the organisation and where appropriate to the Government Modern Slavery Helpline.

EFFECTIVENESS AND 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 in 2021 and all employees and workers are required to renew the training annually, monitored by HR to ensure compliance. We review our Modern Slavery Statement annually to ensure that any areas of concern and/or potential issues are identified and addressed.

ACC Aviation considers the measures in place during 2025 to have been effective in maintaining awareness of modern slavery risks and providing appropriate controls within the Group's own operations and supplier relationships. No concerns relating to modern slavery were reported during the reporting period.

ACC Aviation recognises that the effectiveness of its approach is dependent on continued awareness, appropriate supplier due diligence and maintaining visibility of risks within its supply chain. During the next reporting period, ACC will continue to review its supplier due diligence arrangements and training completion.

TRAINING

All employees and workers of ACC Aviation at the start of any period of work are required to complete all online training which includes Modern Slavery training and signing the policy to confirm they have read and understood its contents. All employees are required to re complete this training on an annual basis where appropriate. The training is updated by the online training provider, and the new ACC modern slavery statement is uploaded.

ACC Aviation monitors completion of mandatory modern slavery training through its HR systems and aims for 100% completion. Where completion is outstanding, HR follows up with the relevant individual or manager.

Given the nature and size of the Group's supply chain, ACC Aviation does not currently have comprehensive visibility of training provided by all suppliers.

REPORTING AND RESPONSE

ACC Aviation encourages employees, workers, suppliers and other business partners to raise concerns relating to modern slavery through its established reporting channels, including its whistleblowing procedure.

Any modern slavery or human trafficking concerns are documented, investigated and reported to the relevant authorities where required, and disciplinary actions are taken where required.

GOVERNANCE AND BOARD APPROVAL

Responsibility for overseeing ACC Aviation's approach to modern slavery sits with the Board, with day-to-day responsibility delegated to the relevant members of the senior management team. HR supports the implementation and monitoring of relevant policies, training and reporting arrangements. Any significant modern slavery concern would be escalated to senior management and the Board as appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors of NEWACC (2018) Limited on 28 October 2026. The Board confirms that the statement is accurate to the best of its knowledge and belief. It is available on the ACC Aviation website and will be updated annually in line with the Act's reporting requirements.

Philip Mathews

Philip Mathews
Chief Executive Officer
28 October 2026