

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Date of statement: 28th April 2022

Introduction

This Modern Slavery and Human Trafficking Statement is made pursuant to section 54 of the Modern Slavery Act for the financial year ending December 31st 2021 and applies to all who work directly and on behalf of “Network Aviation Group companies” being all group and subsidiary companies over which the group’s Board has control. Modern slavery is a violation of human rights and remains a global issue where individuals are forced to work illegally and against their will.

Respect for human rights remains integral to the culture of all Network Aviation Group companies and all officers, directors, employees or affiliates of these entities are expected to act with integrity.

We are committed to our collective responsibility to prevent, detect and if necessary, to report on any violation of these rights. There are no known issues of modern slavery detected in our organisation or within our supply chain.

In this statement we will describe our organisational structure, our policies and our risk-based approach, in improving processes to counter and prevent modern slavery. We will address this area both internally and externally via our business relationships and global supply chain management.

Our Organisation

Network Aviation Group companies have traded successfully in the aviation sector since 1985 and comprises of 29 aviation companies which cover cargo sales, logistics and the management of freighter and passenger aircraft.

We represent a portfolio of some of the world’s leading airlines with offices in most major capitals throughout Asia, Africa, the Caribbean, Canada, Europe, UAE and the USA. We deliver a variety of sales and aviation related services to these client airlines whilst also managing a global fleet of freighter aircraft for charter operations and on a network of scheduled routes.

With established teams in all major air cargo hubs, alongside our managed fleet of aircraft, our combined specialism lies in the offering of a full range of general sales and service agent (“GSSA”) services and enables us to deliver unparalleled expertise in capacity management and aviation support services.

The policies of Network Aviation Group companies are coordinated at Group level and ensure accountability and governance.

Our Supply Chain

For our core business activities, our network of suppliers consists of commercial aircraft, air operators and aviation support service providers. Due to the global nature of the aviation sector, Network Aviation Group companies are committed to procuring services from suppliers who demonstrate ethical principles, wherever they may be located. We will not, knowingly, conduct business with any party engaged in modern slavery or human trafficking.

In the normal course of business, we pay particular attention to those providers located in sensitive, high-risk areas or in service categories which may expose us to a higher potential risk. Equally, we apply diligence and oversight on all parties for any legal or financial risk.

Our current supply chain risk review has considered our existing commercial relationships and the nature and location of the services provided. Based on these criteria, our initial review does not indicate widespread risk of modern slavery in our supply chain.

Continuous Improvement and awareness

Acknowledging those operations in environments where an elevated risk has been flagged, we will focus our enhanced diligence for our assurance in these areas in the coming year. It is our intention to perform a targeted risk audit in the small number of higher risk areas. We will collect further diligence from our highest risk ranked suppliers on the visibility of their supply chains. Our procurement team will assess, and risk rate the supply chain and identify any required mitigation requirements. Additionally, our team will also perform random sampling risk assessments.

Specifically, we acknowledge that the airline industry and their crew members and ground handlers may also have some exposure to potential modern slavery and human trafficking. We will raise awareness, generally, through the training of all employees and will continue to ensure that all staff understand clear processes for reporting any suspected incidences of modern slavery.

Relevant Policies and Code of Ethics

Network Aviation Group companies operate the following policies:

Whistleblowing Statement; this statement is referenced within our **Code of Ethics** and is included within our **Anti Bribery and Corruption Policy**. This enables employees to raise concerns in confidence and supports the principle of open reporting. It is our intention that our **Modern Slavery and Human Trafficking Policy** will further develop this process, more specifically, to address concerns relating to the activities of the supply chain for Network Aviation Group companies.

If you wish to see a copy of any of the policies stated above, please visit our website: www.network-airline.com

Board Approval.

This Modern Slavery Statement has been approved by the Board of Directors of Network Aviation Group Limited. It will be reviewed and updated annually.



Andrew Leslie
Group Chairman