

Modern Slavery Statement

This statement is issued on behalf of FR Aviation Limited (“FRA”) and all affiliates and subsidiaries thereto, including FB Heliservices Limited (“FBH”) and FR Aviation Services Limited (“FRAS”). This document constitutes our modern slavery statement for the financial year ending 31 December 2020 and describes the approach and measures which FRA and its subsidiaries is taking to prevent Modern Slavery in our business and associated supply chain.

Business Structure and Supply Chain

We recognise the importance of our supply chain relationships and the role these relationships play in our success. Our integrity and reputation is key and we are resolute in our commitment to conduct our business in a fair and transparent manner. Quite simply, Modern Slavery has no place within either our business or our supply chain.

Our business is uniquely diverse, and the projects we undertake are incredibly varied. Our capabilities include Aircrew Training, Aircraft Engineering & Maintenance, Search & Rescue, Surveillance Operations and Operational Readiness Training. A significant proportion of our turnover is spent with third parties. In 2020, we spent upwards of £50m across a diverse supply base of over 800 suppliers within our three principal businesses, FRA, FBH and FRAS. Within the FRA business, the majority of our supply base is centred in the UK (66%), with approximately 13% from Europe, 19% from the USA and Canada and the balance (2%) mainly centred in the Middle East. Our company spend is distributed across multinational organisations and Small-Medium Enterprises (SMEs) alike.

Due Diligence, Risk Assessment and Management

In order to become a supplier to FRA and its subsidiaries, suppliers are subject to a robust due diligence process, appropriately and proportionately applied to the nature of each engagement. We regularly monitor and review our suppliers and routinely update and refresh our supplier due diligence process to ensure that potential exposure to modern slavery is kept to an absolute minimum, using a risk-based approach both within our business and within our extended supply chain. As a consequence, we have not identified any occurrences of modern slavery, either within our business or within supply chain in this financial year.

We continue to actively promote awareness of Modern Slavery within our business and rolling out training to all our employees to ensure that our workforce is able to recognise and quickly act upon any signs of modern slavery.

Policies

We seek to demonstrate respect for basic human rights through our policies. The following company policies support us in ensuring that modern slavery is not taking place in our supply chains or business:

- **Code of Business Conduct**
Our Code of business conduct is the centrepiece of our commitment to maintaining our integrity. It describes what we must do and how we must behave to ensure that we maintain the trust of all our stakeholders. This includes specific reference to anti-slavery and human trafficking.
- **Responsible Supply Chain Management policy**
This policy sets out the basic principles of conducting business in an open, honest and transparent manner, and the behaviours and practices we expect of our suppliers and partners (set out in our supplier code of conduct). This includes expectations for our suppliers

to undertake due diligence efforts in relation to their own operations and networks to ensure they are free from slavery and human trafficking.

- **Supplier Code of Conduct**
Our Supplier Code of Conduct sets our vision and expectation for our supply chain to help us “do the right thing” and sets out what our suppliers can expect from us in return.
- **Anti-slavery and Anti human Trafficking policy**
This policy outlines our commitment to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- **Inclusivity Policy**
This policy which covers Diversity and Inclusion Policy, Equal Opportunities Policy and Dignity at Work ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated.
- **Grievance Policy and Procedures**
The grievance policy and procedures provide a process and information for individuals seeking to raise concerns, problems, complaints or questions arising during their course of employment

Effective action taken to address Modern Slavery

Since 2019, we have run a ‘See it? Say it...Speak Out’ campaign to open channels of communication across the business and to educate employees of their responsibilities regarding ethics and compliance and their roles as guardians of our business reputation. This includes promotion of our 24/7 helpline provided and staffed by a dedicated 3rd party company and available in a number of different languages. In 2020 we also introduced a greater number of ethics champions to the business to promote ethical behaviour and to provide help and guidance on ethics or compliance related issues including human rights issues.

We also published our updated grievance policy and procedures to facilitate formal complaints for wrongdoing and introduced our new Inclusivity policy.

A new business wide Employee Representative Group made up of peer nominated members from each base was also introduced to provide a formal feedback mechanism to our Senior Leadership Team.

Training and communication

To help our employees identify and address modern slavery risk in our business, the topic is covered in our mandatory annual Ethics and Anti-Bribery and Corruption (ABAC) training to ensure all employees are aware of the issue and understand their roles.