



AirTanker Slavery and Human Trafficking Statement 2025

A zero tolerance

Modern slavery, including servitude, forced labour and human trafficking is a global issue and affects every country, sector and industry. It represents some of the gravest forms of human rights abuse in society.

AirTanker Group has a zero tolerance approach to modern slavery within its business, its operations and its supply chain. In line with the requirements of S54 of the UK Modern Slavery Act 2015, this fifth public statement for financial year ending January 2024 addresses the current and proposed actions we are taking to address the risks and prevent modern slavery in its value chain.

Introduction

AirTanker Holdings Ltd and AirTanker Limited is a consortium made up of leading Aerospace, Defence and Investment Management specialists - Airbus Group, Equitix, and Thales. AirTanker Services Ltd is owned by Airbus, Babcock, Rolls-Royce and Thales. This statement applies to all three entities (jointly referred to as "AirTanker").

Airbus Defence and Space, Rolls-Royce and Thales, along with Babcock and Eaton Mission Systems, also form AirTanker's primary supply chain representing around 70% of our annual supply chain expenditure.

We have approximately 700 personnel working across 3 fixed locations within the UK and a presence overseas supporting civil and military operations.

Our Business and Commitment

The relevant Boards of Directors are responsible for the overall management, conduct and performance of the businesses and their operations. We procure aviation products which by necessity are manufactured and delivered to the highest standards and regulations, tested rigorously and produced in high-standard environments strictly in accordance with the requirements of aviation safety regulations.

Our supply chain currently consists of over 400 direct suppliers and a large number of indirect suppliers. For example, Airbus who supplied us with our fleet of 14 A330-200 aircraft have a supply chain in excess of 7,000.

We have identified areas within our operations and supply chain that are most at risk of modern slavery and set out in this statement how we are managing these risks.

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Whilst we recognise the need for continual improvement in this area, our risk management process is led by a group of managers who regularly review the effectiveness of the actions we are taking. This statement will be updated annually and will include the progress made in respect of this statement, together with our plans for continuing our commitment for the following year.

Due Diligence, Risk Assessment and Management

We continue to assess our supply chains with particular emphasis on factors that indicate a higher modern slavery risk, such as certain geographic areas and industries, particularly those with lower labour costs (e.g. the supply of textiles used in the production of uniforms, work wear and blankets, etc). Any potential high-risk supplier will be requested to provide us with information on the potential risks to slavery and human trafficking that exist in their business and supply chain, and the steps that they are taking to detect and manage those risks. As an example, our uniform provider has a documented and structured Corporate Social Responsibility policy stating no forced, bonded, child or involuntary labour shall be used and the only suppliers to them are members of SEDEX (The Supplier Ethical Data Exchange.)

Additionally, all new suppliers are requested to provide a statement confirming that they comply with statutory requirements regardless of their annual turnover. Any potential supplier to AirTanker who does not comply with S54 of the UK Modern Slavery Act 2015 is not approved.

AirTanker continues to utilise JOSCAR, the Joint Supply Chain Accreditation Register. This collaborative tool allows people working within the Supply Chain to actively manage our Suppliers and third parties on a range of compliance information and also assist us in monitoring and auditing our supplier base. In 2024 additional functionality was added to our account to allow greater scrutiny of Suppliers ESG credentials, including Modern Slavery.

Training

AirTanker continues to review its Business Ethics training. Mandatory annual training on ethical and responsible behaviours, including human trafficking training for all employees is being enhanced and will be rolled out in 2025.

Our Ethics and Code of Conduct

AirTanker opposes modern slavery and human trafficking in all of its forms and we are committed to acting ethically and with integrity in all of our business dealings and relationships. AirTanker has developed its own internal Business Ethics policy, AS.21, which is reviewed annually and available on the company's internal website. It has also developed a Supplier Code of Conduct which it expects its direct suppliers to adhere to.

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Furthermore, AirTanker is proactively building its knowledge base about slavery and human trafficking by making it a requirement that all members of the Supply Chain team pass the CIPS Ethics test.

We welcome the introduction of the UK Modern Slavery Act 2015 and have used the UK government's advice and guidance in preparing this statement. As defined by the UK Government, "modern slavery" includes slavers, servitude, forces and compulsory labour and human trafficking.

Future Proofing

We will continue to review our practices with regards to our compliance with the Modern Slavery Act 2015.

Kerry Norman

Commercial & Supply Chain Director, AirTanker Holdings Ltd