



## **Modern slavery statement for financial year 2021/22**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and explains the steps that Mountfitchet Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Mountfitchet Group and its subsidiaries have a zero-tolerance approach to any form of modern slavery. It is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

Mountfitchet Group (MFG) is a global aviation, travel and logistics services organisation operating from over 30 offices across six continents. It is made up of two brands, Voluxis (VXS) and Air Charter Service (ACS).

#### o Voluxis

An air charter operator with a global Air Operators Certificate (AOC). It has offices in London Biggin Hill, and Farnborough, and offers a fleet of high performing private jet aircraft, as well as offering a range of services including private aircraft charter, aircraft management and charter sales and marketing.

#### o Air Charter Service

Formed in 1990, Air Charter Service is a world-leading provider of private jet charters, commercial airline charters and cargo aircraft charters. Across our global offices we complete over 16,000 ad-hoc aircraft charters annually, generating a turnover in excess of a billion pounds each year. ACS is not an aircraft operator and does not own or operate any aircraft. ACS arranges flights on behalf of our clients with FAR Part 135 (or local equivalent) Direct Air Carriers that exercise full operational control of the aircraft and the charter flight at all times.

### **ACS Modern Slavery Annual meeting**

This meeting took place on 28<sup>th</sup> June 2022 chaired by the Chief Operating Officer.

#### **Attendees**

Group Commercial Director

Group Legal Director

HR Manager

Senior Legal Counsel

## Risk Assessment

### 1. Supply chain

MFG has assessed the risks of modern slavery and human trafficking throughout its supply chain and across all its brands, and it believes that as its suppliers are in the aviation industry, this presents a very low risk of slavery and human trafficking. Aviation is by its nature a highly skilled industry where all employees are highly trained and skilled. This level of skill is reflected in the industry and its supply chain. MFG has also assessed the risks throughout the supply chain of its 2<sup>ND</sup> tier suppliers and found that as these are complimentary aviation and transportation businesses supplying the aviation industry, there is a similarly low limited risk of slavery and human trafficking within this supply chain.

### 2. Geographically

MFG recognises that the risks of modern slavery and human trafficking can vary greatly between the different regions of the world and as a global company with an international presence remains vigilant to the risks inherent in operating internationally. As such, MFG is careful to rigorously control every element of the recruitment process throughout its offices and is careful not to employ anyone that could be considered to be vulnerable to Modern Slavery or Human Trafficking. MFG centralises its Human Resources department at its ACS London head office and in doing so, can ensure that it enforces the same zero tolerance attitude to modern slavery and human trafficking that it demonstrates and ensures across all its locations.

## Our policies

MFG ensures that ACS and VXS operates a number of internal policies to ensure that business is conducted in an ethical and transparent manner. These policies include:

ACS's Code of Ethics:

### 1. Recruitment Procedure

ACS operates a robust recruitment procedure, including conducting eligibility-to-work checks on all employees. This eligibility compliance operates to safeguard against human trafficking or individuals being forced to work against their will.

### 2. Code of Ethics

The ACS Supplier Code of Business explains the manner in which ACS conducts its business affairs and provides the basis of how, as an organisation, ACS expects its employees and suppliers to act and comply with this code when providing its services.

### 3. Whistle-blower Policy

This explains that employees are protected if they make a disclosure related to wrongdoing in the company.

### Training

Our employees are trained to be vigilant to the signs and dangers of modern slavery and human trafficking and know how to report any concerns they may have with our Whistle blowing policy. They are required to read and acknowledge our Code of Ethics which includes our company policy and responsibility to not engage with suppliers who do not align themselves with our ethics.

In addition, employees/colleagues with direct responsibilities for engaging with suppliers also undertake bespoke anti-slavery and human trafficking training.

### Our suppliers

As a provider of aircraft charters, ACS procures aircraft directly from aircraft operators and airlines. ACS operates a supplier policy and maintains a preferred partner list. ACS conducts due diligence on all suppliers before allowing any airline to become a preferred partner. The ACS anti-slavery and human trafficking policy forms part of the ACS Code of Ethics, that all suppliers receive and are required to comply with, to confirm that no part of their business operations or supply chain, breaches the ACS policy on anti-slavery or human trafficking.

As an AOC holder, Voluxis conforms to all the strict requirements dictated by the UK CAA. Most of its suppliers are airport service providers, which means that they are airside at airports licenced by the International Civil Aviation Organization (ICAO), so require stringent levels of safety and security, making the potential risks very low.

### Our performance indicators

MFG understands the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- ACS monitors the responses from both airline suppliers and non-airline suppliers, all of whom are requested to sign and adhere to the ACS 'Code of Ethics'
- ACS reviews its Anti-Slavery policy annually to discuss any areas or new areas of concern

### Next steps

We continue to build on our policy by reviewing and reinforcing the steps we take to vet both existing and new suppliers, we are internally communicating that we are mandating we will not work

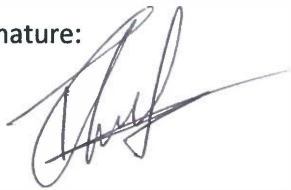
with any suppliers that do not have a suitable Modern Slavery statement or unless they sign our Code of Ethics which incorporates Slavery and Human Trafficking.

Approval for this statement

This statement was approved by the Board of Directors on 28<sup>th</sup> June 2022

Name (Director): Ruan Courtney (Chief Operating Officer)

Signature:



Date: 28<sup>th</sup> June 2022