



# AIR CHARTER SERVICE

## Modern slavery statement for financial year 2016/17

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and explains the steps that Air Charter Service (ACS) 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. Air Charter Service has a zero tolerance approach to any form of modern slavery. ACS 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

Formed in 1990, Air Charter Service is a world-leading provider of private jet, commercial airliner and cargo aircraft charters. Across a global network of 20 offices we complete in excess of 10,000 aircraft charters annually, generating revenue nearing half a billion dollars 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 17<sup>th</sup> November 2016 and consisted of the following attendees.

Ruan Courtney – Chief Operating Officer  
Tamsin Simmons – Human Resource Director  
Justin Lancaster – Group Commercial Director  
Lloyd Robinson – Business Development Director  
Omar Seed – Head of Legal  
Anna Tindall – Legal Counsel

### Our high risk areas

#### 1. Supply chain

ACS has assessed the risks of modern slavery and human trafficking throughout in its supply chain and 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.

## 2. Geographically

ACS 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, ACS 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. ACS centralises its Human Resources department at its 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

ACS 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 policy

ACS operates a robust recruitment policy, 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 Business

The ACS 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 when providing its services.

### 3. Disclosure Policy

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

## 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 supplier list. ACS conducts due diligence on all suppliers before allowing any airline to become a preferred supplier. The ACS anti-slavery and human trafficking policy forms part of the ACS Code of Ethics, that all suppliers receive and are required to sign and return the document to confirm that no part of their business operations or supply chain, breaches the ACS policy on anti-slavery or human trafficking.

### Our performance indicators

ACS 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:

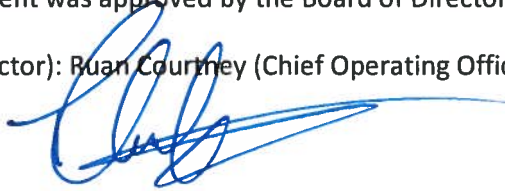
- ACS monitors the responses from both airline suppliers and non-airline suppliers, all of whom are requested to sign and adhere to the ACS 'Code of Ethics'; and
- ACS reviews its Anti-Slavery policy annually to discuss any areas or new areas of concern.

### Approval for this statement

This statement was approved by the Board of Directors on 21<sup>st</sup> January 2017

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

Signature:



Date: 23<sup>rd</sup> January 2017