

## **Air Partner Limited and its subsidiary companies**

### **Modern Slavery Act 2015 (the Act) Statement**

#### **Introduction**

This statement contains a summary of the measures taken by Air Partner Limited and its subsidiary companies (Air Partner) to implement the requirements of the Modern Slavery Act 2015 for the financial year ending 31 January 2023.

#### **Overarching Objective**

Air Partner is committed to the best corporate practices and ethical values and high standards of corporate governance throughout the organisation. Air Partner undertakes to act ethically and with integrity in all its business dealings and relationships and to take all reasonable measures to require the members of its supply chains to do the same.

#### **Business and Organisational Structure**

Founded in 1961, the Air Partner Group is a world-leading international aviation services group providing aircraft charter, aviation safety and security solutions, and managed services to industry, commerce, governments, and private individuals, as well as civil and military organisations.

The Air Partner Group has two divisions: Air Partner Charter and Air Partner Services (previously Safety & Security). Air Partner Charter comprises of group charter, private jets, freight, and specialist services. Group Charter charters large airliners to move groups of any size. Private Jets offers the Company's unique pre-paid JetCard scheme and on-demand charter for up to 19 people. Freight charters aircraft of every size to fly almost any cargo anywhere, at any time.

Air Partner Services comprises Baines Simmons, Redline Assured Security, Air Partner CHS, Kenyon International Emergency Services, and Managed Services. Baines Simmons offers aviation safety management and fatigue risk management. Redline Assured Security delivers government-standard security training, consultancy, and solutions to regulated, high value and high threat environments. Kenyon International Emergency Services is a world leader in emergency planning and incident response. Air Partner CHS specialises in conditioning monitoring solutions that predict and prevent the failure of electromechanical systems.

Air Partner works with Climate and Development experts Climate Impact Partners, to allow clients to offset carbon emissions in support of projects that not only cut carbon but also alleviate poverty and improve lives.

Air Partner Limited is a Wheels Up company, the leading provider of on-demand private aviation in the U.S. and one of the largest private aviation companies in the world. Wheels Up is headquartered in New York City and operates in 25 locations across three continents and employs 2,700 professionals globally. Air Partner Group is ISO 9001:2015 compliant for commercial airline and private jet solutions worldwide. More information is available on the company's website ([www.airpartnergroup.com](http://www.airpartnergroup.com))

## **Our Supply Chain**

We are committed to ethical trading principles and to acquiring goods and services without harm to others. The suppliers to our Group primarily consist of airline operators and professional services (including, but not limited to, IT, legal, consultants and accounting). These are typically supplied to us by large organisations that have their own supply chain principles and ethical standards.

Aviation is a technical and skilled industry. Given the nature of the services we provide, the primary locations in which we operate and the suppliers we use, we believe the risk of modern slavery in our supply chain is low.

We vet suppliers and sub-contractors to ensure that they are committed to ethical labour practices. We require our suppliers to comply with our business partners code of conduct which sets out specific requirements related to working conditions and human rights.

## **Policies and training**

Air Partner reinforces its policy covering ethical business practices through the training of new and existing staff on its related policies, including Air Partner's business ethics policy.

## **Recruitment and Our People**

Air Partner regularly reviews its human resource policies and procedures to ensure that employees are not subject to undue influence and are treated with dignity and respect. We are committed to ensuring that all staff receive fair remuneration for the job they perform. We adhere to the payment of the national living wage and all compulsory minimum wage premiums as set by governments.

As a global services organisation, Air Partner recruits staff in multiple jurisdictions including, but not limited to, the UK, Europe and the USA. In recruiting new members of staff, we apply appropriate checks (including the relevant 'right to work' documentation) to ensure that our employees enter freely into employment and not to employ anyone vulnerable to modern slavery or human trafficking. Air Partner prohibits slave labour, the enforcement and the punishment or the threat of corporal punishment and inhumane treatment. Air Partner also prohibits the recruitment of anyone under the age of 16 years in any position and the employment of anyone under the age of 18 years in hazardous work.

## **Process Improvement**

The Group continues to review and improve its internal controls and Air Partner will investigate additional steps that it can introduce to its internal controls in the next year to further support the provisions of the Act.

## **Approved by the Company**

This statement is made pursuant to section 54(1) of the Act, for the financial year ending 31 January 2023. It has been approved by the Board of Air Partner Limited and will be updated annually in line with the Act's reporting requirements.

A handwritten signature in blue ink, appearing to read 'Mark Briffa', is written over a light blue horizontal line.

Mark Briffa  
Director, Air Partner Limited  
May 2022