

## **Mountfitchet Group – Modern Slavery Statement** **Financial Year 2024/25**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and explains the steps that Mountfitchet Group Limited and its subsidiaries (together “MFG”) have taken and are continuing to take to ensure that modern slavery and human trafficking are not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. MFG has a zero-tolerance approach to any form of modern slavery. It is committed to acting ethically, 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 within its business or supply chain.

### **MFG Business**

With locations in more than 35 countries across six continents, MFG is a global aviation, travel, and logistics services organisation, with key brands such as Air Charter Service (“ACS”), an aircraft charter brokerage, and Voluxis, a private jet operator and aircraft management company.

Formed in 1990, MFG’s main brand ACS is a world-leading aircraft charter brokerage, procuring private, commercial and cargo aircraft charters on behalf of its clients. Across ACS’s global offices, ACS arranges more than 30,000 aircraft charters on behalf of its clients annually, generating a turnover in excess of one billion pounds sterling 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

Another key brand of MFG, Voluxis, is an aircraft operator with two air operator certificates in the United Kingdom and San Marino, offering aircraft management services to aircraft owners, and arranges private and charter flights on those private jet aircraft. Its main offices are located in London Biggin Hill and Farnborough in the United Kingdom.

### **Modern Slavery Risk Assessment**

#### **1. Supply Chain**

MFG has assessed the risks of modern slavery and human trafficking throughout its supply chain. As its suppliers are all predominantly in the aviation industry, this presents a very low risk of slavery and human trafficking. Aviation is by its nature an extremely regulated industry with highly trained and skilled staff. This level of skill is reflected in the industry and MFG’s supply chain.

MFG has further assessed the risks throughout each of its subsidiary businesses. Ancillary businesses, such as ACS Time Critical Services, are complementary businesses, with a similarly low risk of modern slavery and human trafficking.

#### **2. Geographically**

MFG recognises that the risks of modern slavery and human trafficking can vary greatly between different regions of the world. As a global company with a strong international presence, MFG remains vigilant to the risks inherent in operating internationally.

As such, MFG is careful to rigorously control each element of its recruitment processes throughout its offices and is careful not to engage any individual who may be considered vulnerable to modern slavery and human trafficking.

MFG centralises its key departments, such as HR, Legal, Compliance and Operations at its London head office and in doing so, it can ensure that the same zero tolerance attitude to modern slavery and human trafficking demonstrated at its head office may be enforced across all its locations.

## **Policies**

MFG ensures that it operates a number of internal policies to enable business to be conducted in an ethical and transparent manner. These policies include:

### **1. Recruitment Procedure**

MFG 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 Ethics**

MFG's Supplier Code of Ethics explains the manner in which it conducts business affairs and provides the basis of how, as an organisation, it expects its suppliers to act when providing services.

### **3. Whistleblowing**

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

## **Training**

MFG's employees are trained to be vigilant to the signs and risks of modern slavery and human trafficking, both in its supply chain and in conjunction with its customers, and know how to report any concerns they may have in accordance with its whistleblowing policy.

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

## **MFG Suppliers**

MFG Suppliers are required to read and acknowledge MFG's Code of Ethics so MFG may ensure it does not engage with suppliers who do not align themselves with its own ethics and high standards.

More specifically, ACS as an aircraft charter brokerage arranges aircraft charter flights directly from aircraft operators and airlines. ACS maintains a preferred supplier list and conducts due diligence on its suppliers.

Furthermore, as an air operator certificate holder, Voluxis conforms to all the strict requirements dictated by the UK and San Marino Civil Aviation Authorities. Voluxis' suppliers are primarily airport service providers, which means that they carry out duties airside at airports which are licenced by the International Civil Aviation Organization (ICAO). Therefore, stringent levels of safety and security are required at all times, making any potential risks very low.

### **Key Performance Indicators**

MFG understands the effectiveness of the steps it is taking to ensure that modern slavery and human trafficking is not taking place within its business or supply chain as:

- MFG monitors the responses from both airline suppliers and non-airline suppliers, all of whom are requested to sign and adhere to its Code of Ethics;
- MFG reviews its modern slavery policy and statement annually to discuss any current areas or new areas of concern; and
- MFG provides guidance internally to enable early identification of potential risk factors regarding the clients requests for aircraft charters.

### **Next Steps**

MFG continues to build on its policy by reviewing and reinforcing steps currently taken to carry out due diligence on both existing and new suppliers. MFG internally communicates that it will not work with any suppliers who do not have a suitable modern slavery statement or policy, or instead acknowledge MFG's Code of Ethics incorporating such standards.

### **MFG Modern Slavery Annual Meeting**

This meeting took place on 30<sup>th</sup> May 2024 chaired by the Chief Operating Officer of MFG and attendees: Group Commercial Director, HR Manager, Legal Director and Training Director.

### **Approval of this Statement**

This statement was approved by the MFG Board of Directors on 17<sup>th</sup> June 2025

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

Signature:



Date: 17<sup>th</sup> June 2025