



Signature Aviation 2020 Statement on Modern Slavery

Signature Aviation plc is a market leading, global aviation support services provider, primarily focused on servicing the Business and General Aviation (B&GA) market. We are a values-based organisation, and behaving in a responsible way, that encompasses the needs of all of our stakeholders, is deeply embedded in our culture. This drives our reputation and underpins the long-term sustainability of the business and our financial performance.

Our businesses and supply chains

We support our customers through our principal business, Signature, and through Global Engine Services (GES).

Signature, including Signature FBO, TECHNICAir™ and EPIC Fuels, provides premium, full-service flight and home base support including refuelling, ground handling and MRO services through the world's largest fixed base operation (FBO) network for B&GA users with around 195 locations covering key destinations in North America, Europe, South America, Caribbean, Africa and Asia. EPIC Fuels is a provider of aviation fuels, supplies and services operating at around 180 branded FBO locations.

Our **GES** business operates primarily in the US and UK and is a leading independent engine service provider to global B&GA operators, the rotorcraft market and regional airline fleets.

Collectively, Signature Aviation operates at around 400 locations on five continents and has more than 5,000 employees world-wide.

Each of our businesses employs dedicated teams responsible for sourcing and managing supplier relationships for their respective business. Signature operates a Procurement department which is responsible for optimising purchasing activities to reduce costs and leverage efficiencies. The Procurement department also ensures enterprise-wide supply chain compliance with applicable laws and regulations, as well as Signature Aviation's policies and procedures, including those related to compliance and ethical business conduct. GES operates a similar department.

Our policies

Our ethical conduct policies set out our commitment to the highest standards of ethical behaviour and ensure that our business relationships and supply chains are managed in accordance with our values. This includes taking steps to confirm that our businesses and supply chains are free from modern slavery and human trafficking. We recognise the overarching importance of human rights and support the principles set forth in the UN Universal Declaration of Human Rights. We are committed to treating people according to merit and contribution, refraining from coercion and never deliberately causing harm to anyone.

Our Code of Business Ethics is the cornerstone of our compliance mindset and corporate programmes. Flowing from the Code, our other policies, procedures and internal controls are designed to address specific compliance areas, conduct or risks in a more comprehensive manner. The Code requires all Signature Aviation employees,

officers, and directors to conduct themselves according to the language and spirit of the Code and to avoid even the appearance of improper behaviour.

The Code and our other policies are reviewed regularly, as are our compliance programmes, and we undertake external benchmarking and evaluation against best practice models. Internal compliance with our policies is monitored and reported through our Internal Audit process.

Our Third Party Vetting Policy sets out guidelines and procedures for assessing Signature Aviation's business partners through risk-based due diligence processes. Depending on the relative risk associated with a third party (determined using criteria such as country, nature of proposed relationship, etc.), we undertake standard or enhanced due diligence on all third parties including suppliers, contractors and service providers. Our compliance programme, including our Third Party Vetting Policy and procedures, are subject to continuous improvement.

We believe our compliance programme and due diligence processes are working as designed and are effective.

In addition, our Code of Ethics for Suppliers, Contractors and Consultants clearly sets out our expectation that our business partners comply with all applicable laws; conduct business in a fair and ethical manner; respect human rights; conserve the environment; and provide high quality, safe products and services. The Code is explicit on the issue of modern slavery and other unethical practices. It requires partners to:

respect the human rights of [their] employees and others in [their] business operations and [. . .] activities for Signature Aviation; to never use or support practices that condone child labour; to not use forced, prison or indentured labour, or workers subject to any form of compulsion, coercion, deception or other abuse of power; to never engage in, support or condone trafficking in persons; and to adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free, and to provide supporting data on your supply chain for tantalum, tin, tungsten, and gold to Signature Aviation when requested.

Whistleblowing/disclosure of unethical conduct

We are committed to fostering a transparent, open working environment where concerns can be readily raised and grievances can be properly addressed in a timely manner. Our Disclosure of Unethical Conduct Policy describes our open reporting culture and processes. Under the Policy, anyone working in or for a Signature Aviation company who suspects that any unlawful or unethical business practice is being carried out (or is likely to be carried out) by any Signature Aviation officer, director or employee or by any supplier, agent, distributor or other person providing services to or acting on behalf of Signature Aviation, is required to report the matter immediately. Retaliation for reporting concerns is strictly prohibited as a matter of company policy.

Our efforts to identify modern slavery risk in our businesses and supply chains

Verification

As described above, Signature Aviation conducts due diligence on each of its suppliers, contractors and service providers pursuant to our Third Party Vetting Policy and other standard vendor management review procedures. These collectively result in a detailed understanding of our business partners, their practices and the products or services they provide to our businesses.

As reported in our 2019 Statement, our Procurement team implemented a Supplier Selection, Monitoring and Control programme to evaluate suppliers annually, beginning in 2019 and also performed for 2020.

Rather than taking a generalised approach, we looked at 25 activities or industries in which modern slavery or human trafficking are commonly known to exist and mapped them against our supply chain activity. The high-risk activities or industries reviewed were as follows: restaurants and food service; construction; landscaping; commercial cleaning services; and factories and manufacturing. These activities/industries were identified based on several key risk indicators, for example, the presence of migrant workers, refugees, young workers (and risk of child labour), contract and agency workers, and female workers.

In 2018, we completed a comprehensive analysis of spend data where it was determined that 30.9% of our suppliers fell into high-risk categories and 69.1% of suppliers were in low-risk categories. When evaluating the high-risk categories, the factories and manufacturing category was the largest by far, representing 90.4% of dollars spent in all high-risk categories, and 80.2% of all suppliers, by number, engaged by our businesses.

After further analysing spend in the factories and manufacturing category, it was determined that it was spent on aviation parts and products which are manufactured in highly capitalised factories, employing highly trained and skilled technicians. These facilities are monitored (and periodically audited) by regulatory agencies charged with aviation safety (FAA, EASA etc.) and representatives from customer quality organisations (whether an airframer, engine manufacturer or aircraft system manufacturer) and, as a result, present a reduced risk of the presence of modern slavery practices (as compared to some other types of manufacturing operations).

In addition, recognising that modern slavery and human trafficking plague all countries—developed and developing—we reviewed each of the countries in which we undertake business and rated each for its perceived risk of modern slavery and human trafficking, categorising our operations there as high-, moderate- or low-risk. Based on this methodology, it was determined that, of the spend reviewed, 98.6% was made in countries designated as a low-risk, 0.2% was made in countries designated as a moderate-risk, and 1.2% was made in countries designated as a high-risk.

Audits

Implementing further controls around Signature Aviation suppliers, in 2019 we implemented a policy to evaluate key suppliers on an annual basis, including review of their qualitative performance and control metrics, financial stability, and ethics and compliance programmes. While we may visit suppliers on an unannounced basis or with short notice, audits are commonly scheduled in advance to ensure appropriate supplier personnel are present to answer questions. We have found this to be the most effective way to undertake audits, particularly if we are auditing suppliers or service providers to ensure compliance with aviation regulatory requirements.

The effectiveness of our efforts

Accountability

To date, we believe that Signature Aviation has been highly effective in monitoring the risk of modern slavery and human trafficking, and in ensuring that both are avoided in our business operations and in those of our partners and suppliers.

Given that Signature Aviation has generally maintained long-term, stable relationships with key suppliers, contractors and consultants, we believe that they are aware of our expectations regarding ethical business practices.

Further, if dealing with a supplier or service provider that is considered to pose a higher risk, we may review our Code of Ethics for Suppliers, Contractors and Consultants orally with the supplier or service provider, or require

that they formally certify in writing that they comply with our Code. The Code is also clear that our expectations encompass not only our partners' businesses, but their supply chains as well.

Certification

As noted above, our Code of Ethics for Suppliers, Contractors and Consultants sets forth our expectations of our business partners. It is mandatory, and all suppliers and service providers are required to abide by it. And, as also noted above, to the extent that a particular supplier is deemed high-risk, either because of its industry or geographic location, we require periodic certification by the supplier confirming its compliance with the Code and all applicable laws, including those designed to prevent modern slavery and human trafficking.

Training

Signature Aviation policies, standards and internal controls, together with our Values and focus on safety, underpin our approach to risk management. To embed our commitment to being a responsible business into our culture, our decision-making and the way we work, we have in place comprehensive training programmes to ensure that our employees are appropriately informed and empowered to put our policies into action.

During 2020 we again conducted compliance and ethics training for nearly 800 employees across the Signature Aviation group. This training specifically addressed the requirement to assess the risk of human trafficking and modern slavery within our businesses and supply chains and highlighted the need for employees to be alert to these issues and to raise any concerns they may have.

In 2020, we launched an online training course available to all employees to assist them in identifying and reporting any concerns about modern slavery and third-party human trafficking (through our bases and their wider airports) to the appropriate authorities.

* * * * *

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Signature Aviation group's modern slavery statement for the financial year ending 31st December 2020 as approved by the Board on 25 February 2021.

Signed on the Board's behalf by:



.....
Mark Johnstone, Group Chief Executive