

## Modern Slavery Act – Statement 2016

### NATS' position

NATS is the UK's leading provider of air traffic control services and each year we handle around 2.4 million flights and 250 million passengers in UK airspace. In addition to providing services to 13 UK airports and managing all upper airspace in the UK, we provide services in Europe, the Middle East, Asia and North America. Further information is available on our website [www.nats.aero](http://www.nats.aero).

NATS, and everyone within the organisation, are absolutely committed to preventing slavery and human trafficking in our corporate activities and to complying with the requirements of the Modern Slavery Act 2015 ('the Act').

### Internal governance, policies and awareness

NATS regularly reviews its internal policies to ensure that they reflect best practice and comply with legislation in the countries in which we operate. The policies we have in place include:

- a company-wide Code of Ethics;
- a Code of Conduct covering all employees;
- a Whistleblowing policy open to all employees, customers and suppliers; and
- extensive supply chain governance, policies and procedures.

Compliance with the above is monitored by senior management.

Appropriate training is provided to relevant staff, for example to those involved in procurement, and staff also have access to external guidance on best practices. NATS also adopts an open and collaborative approach with the trades unions representing our staff, and aims to adopt the highest standards in recruitment, both of permanent employees and temporary workers.

### Supplier due diligence

The organisation is currently deploying an enhanced due diligence programme for all UK and overseas suppliers, which is reviewed and validated annually in a cycle of continuous improvement. This programme includes:

- obtaining information about suppliers, including product and geographical information and any previous breaches of labour or human rights standards, to allow us to assess the risks of modern slavery and human trafficking;
- assessing the extent to which our suppliers are familiar with their obligations under the Modern Slavery Act and that they have appropriate policies in place, including within their own supply chain; and
- creating a risk profile for strategic and key suppliers and mitigation plans where necessary, including seeking to replace suppliers who fail to provide adequate evidence that they comply with the requirements of the Act.

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### Performance

In addition to its own research, NATS uses a range of third party services, including JOSCAR, to provide and collect supplier information and to assist in the process of checking compliance. In order to monitor our performance against our policies and enable us to enhance them going forward, we are developing a range of measures, for example based upon the results of our risk assessments, and supplier and contract performance reviews

### Future developments

We are committed to enhancing our response to the risk of slavery and human trafficking over the short and longer terms. This statement covers the period from 1 April 2015 to 31 March 2016 and has been approved by the Board of NATS Holdings Limited. Future statements will be updated annually and published in line with our annual report and accounts.

Martin Rolfe  
Chief Executive, NATS  
30 September 2016