

Slavery and Human Trafficking Statement  
(Originally Published April 2018 & updated January 2019\*)

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').

NATS is the UK's leading provider of air traffic control services. 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 providing services in Europe, the Middle East, Asia and North America. Further information on our business is available on our website [www.nats.aero](http://www.nats.aero).

This annual statement is on behalf of all NATS Group companies, and the definition 'NATS' used herewith includes the following legal entities: NATS Holdings Limited, NATS Limited, NATS (En Route) PLC, NATS (Services) Limited, NATS Solutions Limited, NATSNAV Limited, National Air Traffic Services Limited, NATS Services (Asia Pacific) Pte Limited, NATS (USA) Inc, NATS Services DMCC, NATS Services LLC, NATS Services Canada Inc, NATS Services (Hong Kong) Limited.

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:

- an Anti-Slavery and Human Trafficking policy
- a Responsible Business policy
- a company-wide Code of Ethics;
- comprehensive HR and recruitment policies;
- a Code of Conduct covering all employees and contract staff;
- 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 recognised trades unions representing our staff, and aims to adopt the highest standards in recruitment, both of permanent employees and temporary workers.

In the financial year ending March 2018 we have:

- published our Anti-Slavery and Human Trafficking Policy
- published our Responsible Business Policy
- provided and advertised a Whistleblowing hotline for employees and suppliers
- worked through the actions from our risk assessment
- reviewed our database of active vendors and removed those with whom we have not traded with recently and are unlikely to do so in the future thus reducing our risk exposure

We are not aware of any slavery or human trafficking taking place in our business or supply chain, and we shall continue to apply appropriate risk-based due diligence processes to ensure compliance with the Act.

## Risk Assessment

The risk assessment of our first tier suppliers is undertaken in accordance with guidance from the Home Office which assesses suppliers associated with:

1. the countries in which they operate (referring to the Global Slavery Index to determine the list of the countries where slavery is most widespread); and
2. the market sectors in which they operate (in the absence of a definite list of sectors published by Government or NGO, we have assumed that high risk sectors include construction, mining, manual labour, agriculture, cleaning, recycling, waste management, manufacturing, textiles, apparel and hospitality).

The results of our risk assessment have found that the vast majority of our first tier suppliers are low risk. As of April 2018, 93% of our current suppliers are based within the 10 countries identified by the Global Slavery Index as having Governments taking the most action to combat modern slavery.

## Supplier Due Diligence

Since 2015 we have been undertaking due diligence on our suppliers utilising the third party Joint Supply Chain Accreditation Register (JOSCAR) that requires suppliers to provide information on their compliance with a range of legislation, including the Act.

All new suppliers are subject to due diligence prior to trading with us, and in the financial year ending March 2018 we extended the JOSCAR due diligence process to all existing suppliers with whom we trade more than £50k annually, or who fall into a higher risk category.

In 2017 we agreed with JOSCAR a new enhanced set of questions around Modern Slavery and in the financial year ending April 2018, suppliers have been responding to these.

## Future Developments

We are committed to enhancing our response to the risk of slavery and human trafficking over the short and longer term. Over the next year, in addition to continue to undertake due diligence and develop our processes we plan to:

- form an oversight group of Modern Slavery
- develop a Modern Slavery computer based training package for appropriate staff

This statement covers the period from 1 April 2017 to 31 March 2018 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

January 2019

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*\*Note: this statement was originally published in April '18 and was updated in January '19 with a new paragraph (para 3) in response to Home Office guidance to specifically identify all NATS legal entities. The next annual statement will be published in April '19*