

Slavery and Human Trafficking Statement

May 2022



NATS

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Scope

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	National Air Traffic Services Limited
NATS Limited	NATS Services (Asia Pacific) Pte Limited
NATS (En Route) PLC	NATS Services (Hong Kong) Limited
NATS (Services) Limited	NATS Services DMCC
NATS Solutions Limited	NATS Services Canada Inc
NATSNV Limited	NATS (USA) Inc
NATS Services LLC	NATS Services (India) LLP
Searidge Technologies Inc	

Approach

NATS, and everyone within the organisation, are 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').

About NATS

NATS is the UK's leading provider of air navigation services. Each year we handle around 2.5 million flights and 250 million passengers in UK airspace in addition to providing services to 20 UK civil and military 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.

Our suppliers primarily provide us with the technology we require in order to undertake our air navigation service provision, as well as the facilities, logistics and support personnel required to run our business.

Policies

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 and professional behaviours;
- comprehensive HR and recruitment policies;
- a code of conduct covering all employees;
- a whistleblowing policy open to all employees and third parties, including customers and suppliers; and
- extensive supply chain governance, policies and procedures.

Compliance with the above is monitored by senior management and we provide an independent whistleblowing hotline to which employees and third parties can report concerns or suspicions. This facility is advertised within NATS and externally via our website. We have not received any complaints about modern slavery through our whistleblowing line.

We also adopt an open and collaborative approach with the recognised trades unions representing our staff, and aim to adopt the highest standards in recruitment, both of permanent employees and temporary workers.

Due Diligence Processes

All new suppliers are subject to appropriate due diligence prior to trading with us. Since 2015 we have been utilising the aviation and defence industry-wide supplier assurance questionnaire, JOSCAR, to inform our due diligence; JOSCAR is an information platform that requires suppliers to provide information on their compliance with a range of legislation, including the Act.

Risk Assessment

In addition to our normal supplier due diligence processes, we also undertake an annual risk assessment specifically in relation to modern slavery and human trafficking. The risk assessment and assurance processes are undertaken in line with Home Office guidance that recommends suppliers are assessed according to:

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.

Being a service business, our risk assessment of March 2022 confirmed that our first tier suppliers are low risk, and that 88% 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.

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

Training

Appropriate training is provided to relevant staff. We have produced a computer-based training package on modern slavery which has been completed by staff in our supply chain teams and those who work closely with suppliers.

Recent Activities

In the financial year ending 31 March 2022 we have undertaken our annual risk assessment, and reviewed the process by which we undertake it. We onboarded few suppliers over the period due to a reduction in procurement brought about by the coronavirus pandemic.

This statement covers the financial year ending 31 March 2022 and has been approved by the Board of NATS Holdings Limited. Future statements will be produced annually and published in line with our annual report and accounts.



Martin Rolfe
Chief Executive, NATS
May 2022