

Slavery and Human Trafficking Statement

April 2023



NATS

The bottom half of the page features two thick, purple, curved lines that sweep across the page from the bottom left towards the right, partially overlapping the NATS logo.

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
NATSNAV Limited	NATS (USA) Inc
NATS Services LLC	NATS Services (India) LLP
Searidge Technologies Inc	

Approach

We and everyone within our 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

We are the UK's leading provider of air navigation services. Last year we handled over 2.2 million flights 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

We regularly review our 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 2023 confirmed that our first tier suppliers are low risk, and that 89% 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 2023 we have undertaken the following activities:

- Set out our expectations of suppliers in regard to modern slavery at our supplier conference which was attended by over 50 supplier organisations
- Republished our supplier charter which includes expectations of suppliers in regards to modern slavery
- Met with 30 of our top suppliers to discuss and review their action plans on our top three Environment, Social and Governance (ESG) priorities, of which modern slavery is one
- Undertook the relevant modern slavery due diligence on our new facilities management provider
- Introduced a red flag report into our due diligence process which easily identifies suppliers out of process
- Carried out our annual risk assessment

Activity planned for 2023 includes more bilateral discussions with suppliers on the action they are taking in regard to modern slavery.

This statement covers the financial year ending 31 March 2023 and has been approved by the Board of NATS Holdings Limited. Future statements will be produced annually and published on our website at nats.aero. In line with best practice, this statement will also added to the UK Government's Modern Slavery Statement Registry.

DocuSigned by:

AFA7748C981848B...

Martin Rolfe
Chief Executive, NATS