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ACC Aviation Group Modern Slavery Statement 2019

Introduction

This statement contains a summary of the measures NEWACC (2018) Limited and its subsidiary companies (ACC Aviation) have taken and continue to take this year to ensure that modern slavery or human trafficking is not taking place within our business or supply chain pursuant to the Modern Slavery Act 2015.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ACC Aviation has a zero tolerance approach to any form of modern slavery. ACC Aviation is committed to the best corporate practices and ethical values. ACC Aviation undertakes to act ethically and with integrity in all its business dealings and relationships and to take all reasonable measures to require the members of its supply chains to do the same.

About ACC Aviation Group:

Founded in 2002, ACC Aviation is a global aviation services group that provides worldwide solutions to the aviation industry, commerce, governments and private individuals. Our divisions provide expert service in aircraft wet leasing, aircraft charter, asset management, advisory and aircraft interior sectors.

We deliver market-leading solutions and our peerless service and emphasis on reliability has made us one of the world's fastest-growing and most respected aviation service providers.

Our Supply Chain

The suppliers to our Group primarily consist of airline operators and professional services companies (including, but not limited to, IT, legal, consultants and accounting). These are typically supplied to us by large organisations that have their own supply chain principles and ethical standards.

Aviation is a technical and skilled industry. Given the nature of the services we provide, the primary locations in which we operate and the suppliers we use, we believe the risk of modern slavery in our supply chain is low.

Organisational Policies

ACC Aviation is committed to conducting its business in a highly ethical manner and this policy is included in the training of new and existing staff.

ACC Aviation will only work with suppliers that have high standards of environmental and social responsibility and that, when entering into new business relationships or expanding into new business areas, the same standards of business practice are maintained across the Group through appropriate due diligence checks.

ACC Aviation also aims to ensure all activities are carried out with the proper regard for the health and safety of all those involved in its operations and that of the public.

ACC Aviation recruits staff in multiple jurisdictions across the world. In recruiting new members of staff, we apply appropriate checks (including the relevant 'right to work' documentation) to ensure that our employees enter freely into employment and not to employ anyone vulnerable to modern slavery or human trafficking.

ACC Aviation's Employee Handbook requires all staff to follow the company's code of conduct and ethical business practices.



Continuous Improvement

ACC Aviation will continue to review, develop and promote our policies and practices to identify and mitigate risk areas for modern slavery and human trafficking in our business and supply chains. We will review our Anti-Slavery policy annually to discuss any areas or new areas of concern.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, has been approved by the Board of Directors of ACC Aviation and will be updated annually in line with the Act's reporting requirements.

Philip Mathews

Chief Executive Officer