

Ascent Flight Training (Holdings) Ltd Policy and Compliance Statement on Supply Chain Transparency Concerning Modern Slavery and Human Trafficking 2020

This compliance statement has been made on behalf of Ascent Flight Training (Holdings) Ltd ('Ascent') and its subsidiaries.

This statement relates to the financial year ending 31 March 2021

Section 54 of the UK Modern Slavery Act 2015 requires commercial organisations to disclose the steps the organisation has taken during its preceding financial year to ensure that slavery and human trafficking is not taking place within its business and its supply chains, its policies and other information in relation to slavery and human trafficking. The following information is provided in compliance with the foregoing statutes. Ascent is committed to ensuring that its employees and suppliers take appropriate steps to mitigate the risk of modern slavery and human trafficking from occurring in any aspect of its business and supply chains.

Company Values

Ascent has four core values which it conducts its business' by including: being One Ascent Team, Responsive, Respectful, and Safe. Following these values enables Ascent to conduct its business to the highest integrity and ethical standards. Ascent expects its suppliers to do the same and supports any activity taken to eliminate acts of modern slavery and human trafficking. Ascent will not conduct business in any way whatsoever with any supplier that breaches the Modern Slavery Act 2015 or is suspected of doing the same.

Ascent Flight Training (Holdings) Ltd and its Supply Chain

Headquartered in Bristol, UK, Ascent is a joint venture between Babcock Defence and Security Investments Ltd ('Babcock') and Lockheed Martin UK Holdings Ltd ('Lockheed Martin') that provides military flying training to the UK Armed Forces. Ascent employs approximately 300 personnel and is principally engaged in providing infrastructure, aircraft, simulators and training to the UK's military aircrews.

All of Ascent's business is with the UK Ministry of Defence, with a substantial amount of the work subcontracted out to Babcock, Lockheed Martin, Affinity, Airbus Helicopters and Cobham.

Ascent has a moderately complex supply chain with five main first-tier suppliers and numerous lower-tier suppliers. Ascent's first-tier suppliers are engaged in the defence and aerospace industry and are generally engaged in the sale of highly technical products which is operated and governed in a strictly regulated environment. The majority of Ascent's suppliers are UK based, however there are a number of suppliers who operate out of countries outside of the UK and are located in Europe, South America, the US and Canada. Consequently, we believe that our exposure to the risks of modern slavery is low within our own business and supply chain. However, Ascent operates a robust contract management function which endeavours to ensure that all supply chains adhere to UK legislation to the best of its knowledge, and will put in place any additional measures should they be required to

maintain compliance. Furthermore, Ascent liaises with members of its shareholder companies to further ensure that compliance to the legislation retains its currency.

Selection of Suppliers

Ascent verifies product supply chains primarily through a competitive process and through negotiations with non-competitive suppliers. Ascent's non-competitive contracts are negotiated with subsidiaries of Ascent's joint venture shareholders who have their own slavery and human trafficking statements¹. This provides Ascent certainty that the non-competitive suppliers follow the rules and regulations of the Modern Slavery Act 2015 and flow this down their own supply chains. Selection of competitive suppliers is subject to Ascent's procurement process, which is required to comply with a Ministry of Defence procurement code of practice.

We recognise our responsibility for upholding and protecting the human rights of our employees and other individuals with whom we deal in our operations, and we welcome the opportunity to ensure that a culture of respect for and promotion of human rights is embedded throughout our business which can be demonstrated by our commitment to ethical conduct in everything we do.

Our Policy

Ascent are firmly committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and control to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Furthermore, Ascent are committed to a progressive Corporate Social Responsibility, which complements our core business strategy and values. We have enshrined our promise to ensure that such social considerations as the safeguarding of human rights, promoting equality, diversity and inclusion, and the championing of ethical practices are considered at the forefront of our business in our Corporate Social Responsibility Policy.

Due Diligence to Processes

As part of our initiative to remain compliant with the Modern Slavery Act 2015 Ascent maintain a robust risk management system in which we would, were we receive feedback from our supply chain that a concern exists following requests for information, update accordingly. In addition to this, we have in place systems to protect whistle blowers and a contract management function which continually monitors potential risk areas in our supply chains.

We only employ consultants and agency workers through reputable companies and agencies that adhere to our internal policies.

¹ Babcock's statement: <https://www.babcockinternational.com/About/Sustainability/Environment-and-Ethics>

Lockheed Martin's statement: <http://lockheedmartin.com/us/who-we-are/ethics/eradicate-human-trafficking.html>

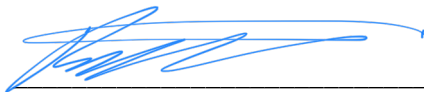
Further Steps

Following a review of the effectiveness we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- We will include statements and provisions in our vetting of appropriate suppliers' that highlight our commitment to complying with the Modern Slavery Act 2015; and
- We will conduct internal training with our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

This voluntary statement has been approved by the Ascent Board of Directors and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.

Signed on behalf of Ascent Flight Training (Holdings) Ltd by:

A handwritten signature in blue ink, appearing to be "Paul Livingston", written over a horizontal line.

Name: Paul Livingston

Title: Director

Date: 7/4/21