



Ascent Flight Training (Holdings) Ltd Policy and Compliance Statement on Supply Chain Transparency Concerning Modern Slavery and Human Trafficking 2023/24

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

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 legislation. 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.

This statement relates to the financial year ending 31 March 2023

Company Values

Ascent has four core values which it conducts its business by, including: being One 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.

Our aim is to have a unified approach in the delivery of our business goals, ensuring the richness of our team is underpinned with diversity, inclusion and belonging.

We expect our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive ethical culture.

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. Through its subsidiary, Ascent Flight Training (Management) Ltd, it employs approximately 420 personnel and is principally engaged in providing infrastructure, aircraft, simulators, and training to the UK's military aircrews.

Most 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 Flying Services, Airbus Helicopters and Draken Europe.

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. Most 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. Similarly we ensure that our aircraft service providers similarly have a compliant anti-slavery statement in place. This provides Ascent certainty that the Competitive and non-competitive first tier suppliers follow the rules and regulations of the Modern Slavery Act 2015 and flow this down their own supply chains.

The selection of competitive suppliers is subject to Ascent's procurement process, which has been rewritten for 2023 to provide greater focus on social value and sustainability in our secondary tier of contracts. This includes extending compliance with Ascent policies; requesting information about a company's compliance at the on-boarding stage of a supplier relationship; competitive tender instructions that incorporate social value and sustainability, and annual supplier audits . We are also 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 of control to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our recruitment and people management processes are designed to ensure that all employees are legally entitled to work in the UK and we have processes in place to safeguard employees from any abuse or coercion.

Furthermore, Ascent are committed to progressive corporate social responsibility, which complements our core business strategy and values. We are committed to our promise to ensure that social considerations, including the safeguarding of human rights, promoting equality, diversity, inclusion and belonging, and the championing of ethical practices are considered at the forefront of our business, and that these are extended to all staff through our Code of Ethics and Conduct Policy.

¹ Babcock's statement: www.babcockinternational.com/sustainability/modern-slavery-transparency-statements/

Lockheed Martin's statement: www.lockheedmartin.com/en-us/who-we-are/ethics/human-trafficking.html



Our social responsibility commitments are detailed and available to all staff within our business plan which is hosted within our corporate SharePoint system.

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, further to receipt of supplier/customer feedback, supplier reviews, employee concerns, or whistleblowing, update accordingly. In addition to this, we have in place systems to facilitate and protect whistle blowers.

Following a review of our procurement systems in place to manage our 2nd and 3rd tier suppliers we have implemented a dedicated contract lifecycle management system which is administered by a dedicated Commercial Services and Procurement team. Through this function we have initiated a contract management system with measures to ensure compliance, review suppliers and to monitor potential risk areas in our supply chains.

We endeavour to employ consultants and agency workers only through reputable companies and agencies that adhere to our internal policies. Where this is not possible, we ensure that we undertake a detailed supplier check before engagement.

Further Steps

Following a wholesale update to our contract lifecycle management processes, we are maintaining a philosophy of continuous review and improvement through regular commercial services and procurement team meetings. We are committed to no slavery or human trafficking in our supply chains we intend to maintain this through the following steps :

- We shall continue to include statements and provisions in our supplier qualification questions when engaging new suppliers, this highlights our commitment to complying with the Modern Slavery Act 2015;
- We shall continue to include corporate social responsibility factors into our procurement projects; and
- We shall conduct internal training, mandated for all staff involved in procurement and contract management 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:

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Name: Kelvin Truss

Title: Director

Date: 17-May-2023