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Ascent Flight Training (Holdings) Ltd Policy and Compliance Statement on Supply Chain Transparency Concerning Modern Slavery and Human Trafficking 2024/25

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 (the Act) requires commercial organisations to disclose the steps they have taken during the preceding financial year to ensure that slavery and human trafficking is not taking place within its business and its supply chains. 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 2024

Company Values

We are a safe and inclusive team that values empowerment, accountability, integrity, courage and collaborative working. We are committed to improving our practices to combat slavery and human trafficking. The Ascent values reflect our dedication to acting ethically and with integrity in all our business relationships. We implement and enforce systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains or in any part of our business.

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.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners.

Most of Ascent's business is with the UK Ministry of Defence, with a substantial amount service provided by five main tier suppliers: Babcock, Lockheed Martin, Affinity Flying Services, Airbus Helicopters and Draken Europe.

This core business is underpinned by a large amount of second tier and tertiary suppliers providing products and services to ensure the effective operations of the business.

Ascent's first-tier suppliers are engaged in the defence and aerospace industry and are generally engaged in the sale of highly technical products and services 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 from countries outside of the UK and are located in Europe, South America,

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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 to maintain compliance, should they be necessary. Furthermore, Ascent liaises with members of its shareholder companies to further ensure compliance with legislation.

Selection of Suppliers

We have a zero-tolerance approach to modern slavery and we expect all of our supply chain and contractors to comply with our values.

Ascent validates supply chain partners at all tiers; primarily through a rigorous on-boarding process, flow down of our own policies, or through a competitive process followed by negotiation. Ascent's non-competitive contracts are negotiated with subsidiaries of Ascent's joint venture shareholders who have their own anti-slavery and human trafficking statements. We ensure that our aircraft service providers have a compliant anti-slavery statement in place. This provides Ascent certainty that the Competitive and non-competitive suppliers adhere to the 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 Contract Lifecycle Policy which includes due diligence checks to assess their compliance with the Act. The policy provides greater focus on social value and sustainability in our secondary tier of contracts. This includes; 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 the UK 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 embed a culture of respect, diversity and inclusion.

Our Policy

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships. Ascent are firmly committed to implementing and ensuring that systems are in place to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

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 approach to 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 Policies.

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

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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.

We operate 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

We will continue to develop our procurement process, including the review of our supplier contracts and training for our procurement teams. We will also take the following steps to combat slavery and human trafficking:

- Regularly update our policies and procedures to account for changes in the law and best practice guidelines.
- Encourage the reporting of concerns and the protection of whistle blowers.
- Monitor our compliance with our anti-slavery policy through regular audits and inspections.
- 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 statement reflects our company's commitment to acting ethically and with integrity in all our business dealings and relationships. It is designed to convey that effective systems and controls are in place to ensure that modern slavery is not taking place anywhere in our business or in any of our supply chains.

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: Tom Newman

Title: Director

Date: 21-06-2024