



Signature Aviation 2022 Statement on Modern Slavery

Signature Aviation Limited is a market leading, global aviation support services provider, primarily focused on servicing the Business and General Aviation (“B&GA”) market. We are a values-based organization, and behaving in a responsible way, that encompasses the needs of all of our stakeholders, is deeply embedded in our culture. This drives our reputation and underpins the long-term sustainability of the business and our financial performance.

Our businesses and supply chains

We support our customers through our principal business, Signature.

Signature, including Signature FBO, TECHNICAir™ and EPIC Fuels, provides premium, full-service flight and home base support including refueling, ground handling and MRO services through the world's largest fixed base operation (“FBO”) network for B&GA users with over 200 locations covering key destinations in North America, Europe, South America, Caribbean, Africa and Asia. EPIC Fuels is a provider of aviation fuels, supplies and services operating at around 180 branded FBO locations.

Collectively, Signature operates on five continents and has more than 6,000 employees world-wide.

Each of our businesses employs dedicated teams responsible for sourcing and managing supplier relationships for their respective business. Signature operates a Procurement department which is responsible for optimizing purchasing activities to reduce costs and leverage efficiencies. The Procurement department also ensures enterprise-wide supply chain compliance with applicable laws and regulations, as well as Signature Aviation’s policies and procedures, including those related to compliance and ethical business conduct. Our procurement policy follows very specific guidance on sourcing, vetting and vendor selection.

Our policies

Our ethical conduct policies set out our commitment to the highest standards of ethical behavior and ensure that our business relationships and supply chains are managed in accordance with our values. This includes taking steps to confirm that our businesses and supply chains are free from modern slavery and human trafficking. We recognize the overarching importance of human rights and support the principles set forth in the UN Universal Declaration of Human Rights. We are committed to treating people according to merit and contribution, refraining from coercion and never deliberately causing harm to anyone.

Our Code of Business Ethics is the cornerstone of our compliance mindset and corporate programs. Flowing from the Code, our other policies, procedures and internal controls are designed to address specific compliance areas, conduct or risks in a more comprehensive manner. The Code requires all Signature employees, officers, and directors to conduct themselves according to the language and spirit of the Code and to avoid even the appearance of improper behavior.

The Code and our other policies are reviewed regularly, as are our compliance programs, and we undertake external benchmarking and evaluation against best practice models. Internal compliance with our policies is monitored and reported through our Internal Audit process.

Our Third Party Vetting Policy sets out guidelines and procedures for assessing Signature Aviation's business partners through risk-based due diligence processes. Depending on the relative risk associated with a third party (determined using criteria such as country, nature of proposed relationship, etc.), we undertake standard or enhanced due diligence on all third parties including suppliers, contractors and service providers. Our compliance program, including our Third Party Vetting Policy and procedures, are subject to continuous improvement.

We believe our compliance program and due diligence processes are working as designed and are effective.

In addition, our Code of Ethical Conduct for Suppliers, Contractors and Consultants clearly sets out our expectation that our business partners comply with all applicable laws; conduct business in a fair and ethical manner; respect human rights; conserve the environment; and provide high quality, safe products and services. The Code is explicit on the issue of modern slavery and other unethical practices. It requires partners to:

to never use, engage in or support practices that condone the use of forced, prison or indentured labor, or workers subject to any form of compulsion, coercion, deception or other abuse of power, which includes human trafficking, slavery and child labor; comply with all applicable laws and regulations relating to the prevention of slavery, human trafficking, child labor, forced labor and the ethical treatment of people.

Whistleblowing/disclosure of unethical conduct

We are committed to fostering a transparent, open working environment where concerns can be readily raised and grievances can be properly addressed in a timely manner. Our Disclosure of Unethical Conduct Policy describes our open reporting culture and processes. Under the Policy, anyone working in or for a Signature company who suspects that any unlawful or unethical business practice is being carried out (or is likely to be carried out) by any Signature officer, director or employee or by any supplier, agent, distributor or other person providing services to or acting on behalf of Signature, is required to report the matter immediately. Retaliation for reporting concerns is strictly prohibited as a matter of company policy.

Our efforts to identify modern slavery risk in our businesses and supply chains

Verification

As described above, Signature conducts due diligence on each of its suppliers, contractors and service providers pursuant to our Third Party Vetting Policy and other standard vendor management review procedures. These collectively result in a detailed understanding of our business partners, their practices and the products or services they provide to our businesses.

The effectiveness of our efforts

Accountability

To date, we believe that Signature has been highly effective in monitoring the risk of modern slavery and human trafficking, and in ensuring that both are avoided in our business operations and in those of our partners and suppliers.

Given that Signature generally maintains long-term, stable relationships with its key suppliers, contractors and consultants, we believe that they are aware of our expectations regarding ethical business practices.

Further, if dealing with a supplier or service provider that is considered to pose a higher risk, we may review our Code of Ethical Conduct for Suppliers, Contractors and Consultants orally with the supplier or service provider, or require that they formally certify in writing that they do and will comply with our Code. The Code is also clear that our expectations encompass not only our partners' businesses, but their supply chains as well.

Certification

As noted above, our Code of Ethical Conduct for Suppliers, Contractors and Consultants sets forth our expectations of our business partners. It is mandatory, and all suppliers and service providers are required to abide by it. And, as also noted above, to the extent that a particular supplier is deemed high-risk, either because of its industry or geographic location, we require periodic certification by the supplier confirming its compliance with the Code and all applicable laws, including those designed to prevent modern slavery and human trafficking.

Training

Signature Aviation policies, standards and internal controls, together with our Values and focus on safety, underpin our approach to risk management. To embed our commitment to being a responsible business into our culture, our decision-making and the way we work, we have in place comprehensive training programs to ensure that our employees are appropriately informed and empowered to put our policies into action.

During 2022 we again conducted compliance and ethics training for nearly 900 Signature employees. This training specifically covered how to assess the risk of human trafficking and modern slavery within our businesses and supply chains, and report any concerns, as well as employees' obligation to do both.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Signature Aviation's modern slavery statement for the financial year ending 31st December 2022 as approved by the Board on 14 March 2023.

Signed on the Board's behalf by:



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Tony Lefebvre, Chief Executive Officer