

Slavery and Human Trafficking Statement

April 2019



NATS



Scope

This annual statement is on behalf of all NATS Group companies, and the definition 'NATS' used herewith includes the following legal entities:

NATS Holdings Limited	National Air Traffic Services Limited
NATS Limited	NATS Services (Asia Pacific) Pte Limited
NATS (En Route) PLC	NATS Services (Hong Kong) Limited
NATS (Services) Limited	NATS Services DMCC
NATS Solutions Limited	NATS Services Canada Inc
NATSNV Limited	NATS (USA) Inc
NATS Services LLC	

Approach

NATS, and everyone within the organisation, are committed to preventing slavery and human trafficking in our corporate activities and to complying with the requirements of the Modern Slavery Act 2015 ('the Act').

About NATS

NATS is the UK's leading provider of air navigation services. Each year we handle around 2.5 million flights and 250 million passengers in UK airspace in addition to providing services to 13 UK airports and providing services in Europe, the Middle East, Asia and North America.

Further information on our business is available on our website www.nats.aero.

Our suppliers primarily provide us with the technology we require in order to undertake our air navigation service provision, as well as the facilities, logistics and support personnel required to run our business.

Policies

NATS regularly reviews its internal policies to ensure that they reflect best practice and comply with legislation in the countries in which we operate. The policies we have in place include:

- an anti-slavery and human trafficking policy;
- a responsible business policy;
- a company-wide code of ethics and professional behaviours;
- comprehensive HR and recruitment policies;
- a code of conduct covering all employees;
- a whistleblowing policy open to all employees and third parties, including customers and suppliers; and
- extensive supply chain governance, policies and procedures.

Compliance with the above is monitored by senior management and we provide an independent whistleblowing hotline to which employees and third parties can report concerns or suspicions. This facility is advertised within NATS and externally via our website.

We also adopt an open and collaborative approach with the recognised trades unions representing our staff, and aim to adopt the highest standards in recruitment, both of permanent employees and temporary workers.

Due Diligence Processes

All new suppliers are subject to appropriate due diligence prior to trading with us. Since 2015 we have been utilising the third party Joint Supply Chain Accreditation Register (JOSCAR) to inform our due diligence; JOSCAR is an information platform that requires suppliers to provide information on their compliance with a range of legislation, including the Act.

Risk Assessment

In addition to our normal supplier due diligence processes, we also undertake an annual risk assessment specifically in relation to modern slavery and human trafficking. The risk assessment is undertaken in line with Home Office guidance that recommends suppliers are assessed according to:

1. the countries in which they operate (referring to the Global Slavery Index to determine the list of the countries where slavery is most widespread); and
2. the market sectors in which they operate.

Being a service business, our risk assessment of April 2019 found that the vast majority of our first tier suppliers are low risk. 93% of our current suppliers are based within the 10 countries identified by the Global Slavery Index as having governments taking the most action to combat modern slavery.

In the period up to the date of this statement, we are not aware of any slavery or human trafficking taking place in our business or supply chain. We shall continue to apply appropriate risk-based due diligence processes to ensure compliance with the Act.

Training

Appropriate training is provided to relevant staff. In 2018 we produced a computer based training package on modern slavery which staff within the procurement team have completed

Recent Activities

In the financial year ending 31 March 2019 we have:

- updated our slavery and human trafficking risk assessment;
- formed a modern slavery oversight group, comprising senior managers from across the organisation, to monitor and improve on-going compliance;
- raised awareness of modern slavery amongst colleagues by holding an information event on the working day closest to the International Day for the Abolition of Slavery; and
- undertaken a supplier due diligence training event with our procurement team.

This statement covers the financial year ending 31 March 2019 and has been approved by the Board of NATS Holdings Limited. Future statements will be produced annually and published in line with our annual report and accounts.



Martin Rolfe
Chief Executive, NATS
April 2019