

JMC Aviation Modern Slavery Policy



Modern Slavery Statement of JMC Aviation Limited[1] (the "Company", "We", "Our", "Us")

1 Opening statement from senior management

1.1 The Company is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

2 Structure of the organisation

- 2.1 The Company provides both engineering services and recruitment solutions in the aviation sector at locations across the world.
- 2.2 The Company's head office is in Exeter, and in the UK in 2024 the Company employed an average of 216 employees. The Company also has offices in Malta and Canada and subsidiary undertakings.
- 2.3 The Company has at the date of this statement not finalised its accounts for the year ending December 2024, but had a turnover in the UK of in excess of £36 million during that period. To find out more about the nature of Our business, please visit the Company's Website: <u>Home JMC Aviation (jmc-aviation.com)</u>
- 2.4 In order to deliver Our services robustly and efficiently and ensure that We have a talented and plentiful pool of resources, We work with a range of suppliers both in the UK and further afield (including in Europe, North America and Asia).

3 Policies

- 3.1 As part of Our commitment to combating modern slavery and human trafficking, We have implemented policies to combat modern slavery and human trafficking.
- 3.2 We have distinct policies for internal Use and also for suppliers.
- 3.3 These policies have been developed in-house and are reviewed periodically.
- 4 Due diligence
- 4.1 As part of Our efforts to monitor and reduce the risk of slavery and human trafficking occurring within Our supply chains, We carry Our due diligence on Our supply chain.
- 4.2 Our procedures are designed to:
- 4.2.1 establish and assess areas of potential risk in Our business and supply chains;
- 4.2.2 monitor potential risk areas in Our business and supply chains;
- 4.2.3 reduce the risk of slavery and human trafficking occurring in Our business and supply chains; and
- 4.2.4 provide adequate protection for whistle-blowers.

5 Risk management

- 5.1 2024 saw the appointment of a new Compliance Director at the Company and expansion thereafter of our compliance and risk management team.
- 5.2 The Company regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain.



5.3 For the vast majority of Our suppliers, representatives of the Company have met with them on a face-to-face basis.

5.4 Due to the nature of Our services, We do not consider that We operate in high risk sectors, however We have identified that some locations might be considered high-risk and accordingly We work very closely with respected and (where applicable) licensed local suppliers in these regions to ensure risk is mitigated. Representatives have met those suppliers and maintain close relationships with them.

5.5 Where We have identified a potential risk, this is recorded on the internal risk register together with the mitigating steps. This is kept under review.

5.6 We have robust contracts with Our suppliers, which may include contractual clauses to ensure compliance with the anti-slavery laws or make include reference to policy documents and adherence thereto. We are clear that We do not tolerate slavery and human trafficking within Our supply chains.

We continue to invest heavily in Company compliance.

6 Effectiveness and KPIs

- 6.1 We review matters regularly to ensure compliance. Our contracts typically have audit clauses in them to permit reviews to be undertaken.
- 6.2 We watch market trends to understand where there may be issues of concern allowing us, were there to be any, the ability to react accordingly.
- 6.3 Due diligence on licensed suppliers includes provision of their up-to-date licence; failure to produce this would be to fail a KPI requirement and would mean that the arrangements would need to be considered and if necessary concluded.



7. Training

7.1 We are committed to educating Our staff to recognise the risks of modern slavery and human trafficking in Our business and supply chains.

7.2 We work to ensure that employees understand the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from Our business and supply chains.

8. Further actions and sign-off

- 8.1 Following Our review of Our actions this financial year to prevent slavery or human trafficking from occurring in Our business or supply chains, We are committed to:
- 8.1.1 audits of key suppliers in higher risk locations;
- 8.1.2 finalising the registration stage for our new / returning largest supplier type with the default inclusion of our anti-slavery and human trafficking supplier policies; and
- 8.1.3 investment in staff training.
- 8.2 This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year commencing 1 January 2024 and ending 31 December 2024.

8.3 This statement was approved on 30.05. 2025 Signed:

Hollie Prendergast

Director

JMC Aviation Limited

Date: 30.05. 2025