



## ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

HeliOperations is committed to ensuring that Modern Slavery in all its forms does not exist within its own business or from within its supply chain. Modern slavery is a crime and a violation of fundamental human rights.

In 2015, the UK Government enacted The Modern Slavery Act 2015 in response to heightened concern around slavery, human trafficking and forced labour in global supply chains. The Act recognises the role that companies can play in tackling these crimes. Modern slavery is a criminal offence under the Act.

This policy applies to all individuals working for the Company at all levels (whether permanent, fixed-term or temporary), and includes volunteers, agents or any other person associated with the Company (collectively referred to as “Employees” in this policy). Every individual in the Company has a personal responsibility to familiarise themselves with this Policy, to understand it and to act in accordance with its provisions.

Modern Slavery as defined under the Act is a term for the criminal activity for certain aspects of the abuse of human rights. It includes:

- **Slavery** – the fundamental element of slavery is the deprivation of freedom of a person by another or others.
- **Servitude** – the forced provision of services, activities or behaviours from one person by another through coercion. This often includes the perpetrator imposing on the victim the obligation for them to live at a particular address against their will/preference.
- **Forced or Compulsory Labour** – where a person (or persons) forces another to undertake work or provide services under the threat of the imposition of a penalty if they do not comply.
- **Human Trafficking** – where the perpetrator arranges travel for the victim with the intention of exploiting them. Often victims are so desperate to leave a location that they consent to the travel, without full comprehension as to the deception involved by the perpetrator.

### Our Commitment to Compliance

To complying with the UK Modern Slavery Act in respect of modern slavery and, in the context of our operations and supply chains we undertake the following activities to ensure that non-compliant practices and behaviours do not pervade our business activities or operations:

- All Employees to comply with the Ethics and Business Conduct Policy
- All key suppliers are required to undergo full due diligence and to provide detailed information about their activities prior to being engaged by a group subsidiary business.
- All key suppliers are required to certify their compliance with the Company.

Any Employee who is found to have committed a violation of this Policy or the Act will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal.