

# Slavery and Human Trafficking Statement

April 2024



**NATS**

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## 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
NATSNAV Limited	NATS (USA) Inc
NATS Services LLC	NATS Services (India) LLP
Searidge Technologies Inc	

## Approach

We and everyone within our 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

We are the UK's leading provider of air navigation services. Last year we handled over 2.2 million flights in UK airspace in addition to providing services to 20 UK civil and military 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](http://www.nats.aero).

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

## Policies

We regularly review our 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 have not received any complaints about modern slavery through our whistleblowing line.

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 aviation and defence industry-wide supplier assurance questionnaire, 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 and assurance processes are 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 March 2024 confirmed that our first-tier suppliers are low risk, and that 91% of our current suppliers are based within eight of the nine 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. We have produced a computer-based training package on modern slavery which has been completed by staff in our supply chain teams and those who work closely with suppliers.

## Recent Activities

In the financial year ending 31 March 2024 we have undertaken the following activities:

- Conducted additional training to Supply Chain staff regarding Modern Slavery.
- Completed our annual risk assessment.

Activity planned for 2024 includes.

- Additional bilateral discussions with suppliers on the action they are taking regarding modern slavery.
- To provide support to any suppliers who wish to develop their stance.
- Extend the NATS Supplier Sustainability Forum topic to include an update on modern slavery and a round table discussion. (The Sustainability Forum includes twenty-six suppliers from around the globe)

This statement covers the financial year ending 31 March 2024 and has been approved by the Board of NATS Holdings Limited. Future statements will be produced annually and published on our website at [nats.aero](https://nats.aero). In line with best practice, this statement will also be added to the UK Government's Modern Slavery Statement Registry.



Martin Rolfe  
Chief Executive, NATS