

HUNT & PALMER

BESPOKE AIR CHARTER

Hunt & Palmer PLC, Premier Aviation (UK) Ltd, Hunt & Palmer Cargo Charters Ltd,
Hunt & Palmer Australia (PTY) Ltd, Hunt & Palmer Hong Kong Ltd,
Hunt & Palmer Travel Services, Aircraft Chartering Services Ltd.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 January 2018 through 31 December 2018.

The statement sets down the commitment of Hunt & Palmer (the Company) to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Hunt & Palmer plc, including all group subsidiary and associate companies thereof and which are as follows:

The Company is an established aircraft charter broking company, registered in England and incorporated in 1986. The Company is the parent of a number of smaller broker entities and travel related businesses as noted above.

The Company is in the business of facilitating the commercial hire of aircraft for carriage of passengers and cargo throughout the world on behalf of any person or persons (the charterer) who has requirement for such, subject always to the Company's terms of business.

The Company arranges the charter of these air systems as an agent for the charterer.

All air systems chartered by the Company are contracted only from operators holding a valid AOC (Air Operators Certificate) issued by the civil aviation authority/administration of the country in which the operator and/or air systems or registered.

The Company may facilitate charter operations in countries around the world by nature of its business, subject always to observing any international sanctions, prohibitions of limitations however the Company has fixed based operations in the following countries:

United Kingdom, Australia, Hong Kong, United States of America

The Company's core business activity, as described above, is undertaken at all these locations by staff employed by the Company and/or the local subsidiary in which they work.

The Company's business is concerned with the aviation industry and more specifically the hire of air systems from licensed operators as described herein, to an international client base that includes major corporations, government departments, NGOs and HNWs.

By its very nature the aviation industry is a closely regulated and technically advanced global business which requires the employment of a highly skilled and attentive workforce and is also one that attracts close scrutiny from supervising bodies in government and commerce along with the attentions of voluntary organizations and members of the public. The majority of suppliers with whom the Company conducts its business have their own Codes of Ethics, Governance and a statutory requirement to comply with international laws regarding Modern Slavery and Human Trafficking. In consideration of this, the Company believes that the risk of Modern Slavery in our supply chain is low.

Training

To ensure a good understanding of the risks of Modern Slavery and Human Trafficking in our business and supply chains, the Company requires all staff at any level, including any agency workers and temporary appointments to complete an online training course within 6 weeks of commencing employment with us and to refresh that training every two years thereafter.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

Whistleblowing policy The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

Code of Conduct - The Company's Code of Conduct sets down the actions and behavior expected of employees when representing the Company.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company uses its reasonable endeavours and the resources at its disposal, to ensure as far as

is practically possible, that these suppliers meet with our obligations in this regard. Such process will include but not be limited to, the use approved databases of corporate information and profiling, government sanctions lists, corporate and government websites and other published information, supplier websites and compliance statements, local knowledge and experience, the building of long-standing relationships with suppliers and making clear our expectations of business partners.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Hunt & Palmer plc Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Mark Jenkinson

Position: Director Corporate Governance & Compliance

Date: 5 April 2019

Signature: 

