Introduction

At Castle Air, we foster a culture based on integrity, trust and mutual respect, regardless of gender, gender reassignment, race (including colour, nationality, caste and ethnic origin), disability, sexual orientation, marital status, part-time status, pregnancy or maternity, age, religion or belief, political belief or affiliation or trade union membership. As such, modern slavery has no place within either our business or our supply chain.

In line with the Modern Slavery Act 2015, this statement is issued on behalf of Castle Air Limited and all affiliates and subsidiaries thereto. This statement constitutes our Modern Slavery Statement for the Financial Year ending 30 November 2027 and describes the approach and measures which Castle Air is taking to prevent modern slavery in our business and associated supply chain.

Business Structure and Supply Chain

The programmes and activities our business undertake within the aviation (helicopter) industry are many and varied including:

- Charter Flights
- Sales and Leasing
- Maintenance and Engineering
- Support Solutions including:
  - In-Country Support
  - Air Ambulance Support
  - Super Yacht Helicopter Support
  - Utility Support
  - VIP Management
- Pilot training and ground school instruction at our academy

Our supply chain relationships are key to our success and our reputation. We spend a significant proportion of our turnover with external suppliers, all of whom have a “demonstrable business presence” in the UK, and value each one for the contribution they bring to our business. Our company spend is distributed across multinational organisations and Small to Medium Enterprises (SMEs) alike.

Due Diligence, Risk Assessment and Management

We have not identified any occurrences of modern slavery, either within our business or supply chain in this financial year.

All of our supply chain partners, whether multi-national companies or SMEs have a “demonstrable business presence” in the UK as defined by Section 54 of the Modern Slavery Act

2015 and, as such, have to abide by UK Legislation with regard to Modern Slavery and Human Trafficking. Castle Air is also registered with the Joint Supply Chain Accreditation Register (JOSCAR), which requires companies to be compliant with Modern Slavery and Human Trafficking Legislation.

We promote awareness of modern slavery within our business, with training available to all our employees, to ensure that our workforce is able to recognise and quickly act upon any signs of modern slavery.

Policies

Castle Air seeks to demonstrate respect for basic human rights through our policies and practices. Policies are contained within our Employee Handbook, made available to all employees via an online portal to which each employee has an individual login. These policies form part of the induction process and it is a condition of all employees' continued employment that they keep up to date with any changes to the Employment Handbook and all the policies contained therein. The following policies and practices help to ensure that modern slavery is not taking place within our business or supply chain.

Slavery and Human Trafficking Policy

Our Slavey and Human Trafficking Policy outlines all the steps the company has taken to combat Slavery and Human Trafficking in the workforce.

Castle Air uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- Maintaining communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations
- Regular review of supply chain policies, codes of conduct and our working practices

Employees are encouraged to raise any concerns using our Public Interest Disclosure (Whistleblowing) Policy and the Modern Slavery Helpline and website, for which details are available in our Slavery and Human Trafficking Policy.

Public Interest Disclosure (Whistleblowing) Policy

Castle Air constantly strives to safeguard and act in the interest of the public and its staff. It is important to us that any fraud, misconduct or wrongdoing, by employees or other agents, is reported and properly addressed. We encourage employees to raise any concern so that it is dealt with properly, rather than kept quiet. Examples of concerns that should be raised, outlined in this policy, are:

- Any criminal offence
- Any failure to comply with any legal obligation

- Any miscarriage of justice
- Anything that poses a danger to the health and safety of any individual
- Damage to the environment
- Any attempt to conceal information on any of the above

The details of Protect (formerly known as "Public Concern at Work"), an independent charity who provide advice and support, are contained within this policy, which also encourages the escalation of any concern to the relevant proper authority (with the details of such authorities included) in any case where it is felt that the appropriate remedial action may not have been taken.

Equality, Diversity and Inclusion Policy

An inclusive work culture where people of different backgrounds are valued equally ensures better outcomes for us all and Castle Air values and actively strives to have a diverse and inclusive workforce in a working environment free from discrimination. We continually engage with our staff as well as external partners to help us to understand how we can make our workplace more inclusive.

Everyone is responsible for the promotion and advancement of this policy. Behaviour, action or words that breach the policy are not tolerated and could be deemed an act of discrimination. We treat seriously all complaints of discrimination made by employees, clients, customers, suppliers, contractors or other third parties and take action where appropriate. Castle Air is committed to ensuring that everyone is protected from victimisation, harassment or less favourable treatment. Any such incidents are dealt with under the Company's Disciplinary Procedures (or other such appropriate measures where the Disciplinary Procedure does not apply) and everyone is encouraged to report any such incidents using the company's Grievance Policy.

Grievance Policy

The grievance policy outlines the process and information for individuals seeking to raise concerns, problems, complaints, or questions arising during their course of employment.

New Supplier Questionnaire

All new suppliers have to fill in a questionnaire before they are accepted by Castle Air. Although a lot of our supply chain are not relevant commercial organisations, it has been identified as an area for improvement that this questionnaire should address Modern Slavery Act 2015 requirements for relevant commercial organisations.

Training and Communication

Castle Air uses an online Human Resources portal, which contains training modules on Modern Slavery, Whistleblowing, Diversity and Inclusion, UK Equality Legislation, and Disciplinary and Grievance.

All employees have an individual login to this portal and are assigned training courses as necessary. Completion of these courses is tracked within the portal.

Sign-off

This Statement has been signed off by Sue Floyd, Finance Director, 16th November 2027.