

# Modern Slavery Statement 2023

Jet Aviation Australia



# Modern Slavery Statement

## Introduction

This Modern Slavery Statement is made by Jet Aviation Australia Pty Ltd ACN 001 540 316 ("Jet Aviation") in accordance with the Modern Slavery Act 2018 (Cth) (the "Act"). This Statement covers the reporting period of 1 January to 31 December 2023, to assess and address the modern slavery risks in its operations and supply chain.

Jet Aviation operates around the world and recognizes the global nature of modern slavery risks and the importance of ensuring that respect for human rights and dignity is upheld and embedded at all levels of the business. Strict adherence to these values, as well as to applicable laws are expected by us everywhere we operate. Jet Aviation does not tolerate any form of modern slavery anywhere within our business or supply chains. Throughout this Statement, the term "modern slavery" is used to refer to the various forms of coerced labour including forced labour, child labour, domestic servitude and human trafficking.

#### Structure, Operations & Supply Chains

Jet Aviation is a private company incorporated and based in Australia, providing aviation products and services across Australia, New Zealand, Asia Pacific and the Middle East. Jet Aviation continues to be a leader of integrated civil, government and military aerospace sales and products support including maintenance, repair and aftermarket support (avionics, spares, component services and advance manufacturing), fixed based operations ("FBO") and fixed and rotor wing aircraft sales.

This Statement is a joint Statement on behalf of Jet Aviation Australia Pty Ltd and its controlled entity, Jet Aviation Australia (QLD) Pty Ltd (Jet Aviation Group) that are deemed reporting entities under the Act. Jet Aviation Australia (QLD) Pty Ltd was incorporated on 31 July 2023 and became operational on 1 December 2023. This Statement provides information about the Jet Aviation Group and references to "Jet Aviation", "Jet Aviation Group", "we" or "our" are used to refer to collectively to the Jet Aviation Group, unless otherwise indicated.

Jet Aviation has its registered office at Upper Ground South, 100 Arthur Street, North Sydney NSW Australia and carries out operations across 12 sites throughout Australia. As of 31 December 2023, Jet Aviation's workforce comprised of approximately 634 employees.



Upper Ground South 100 Arthur Street North Sydney NSW 2060 Australia



Locations





JetAviation.com Tel. +61 2 9708 8555 Fax +61 2 9708 8755 In the reporting period, Jet Aviation worked with approximately 1078 direct suppliers based in Australia and overseas. The majority of the suppliers are based in Australia making up approximately 74% of the supply chain. The remaining direct suppliers were located mainly in the following locations:

- United States (17%)
- Canada (2.9%)
- Singapore (1.7%)

The largest category of products and services procured in the reporting period was aircraft maintenance, repair and overhaul.

## Assessment and Mitigation of Risks of Modern Slavery Practices in the Operations and Supply Chains

During the reporting period, Jet Aviation assessed its potential modern slavery risks across the products and services procured from direct suppliers taking into consideration a number of factors including:

- geographic location,
- industry and
- type of product and services.

Jet Aviation procures products and services from suppliers from different geographic locations which may pose a risk of exposure to modern slavery practices. However, a large portion of products and services were procured from suppliers located in Australia and other low risk countries. Categories that were identified as potentially being vulnerable to modern slavery risk were uniforms and office supplies which were found to be sourced from mostly Australian suppliers. Additionally, as majority of products and services procured during the reporting period were related to aircraft maintenance, repair and overhaul in a highly regulated industry the risk of modern slavery is assessed as low.

Jet Aviation remains committed to maintaining and improving systems and processes to identify and address modern slavery risks related to its operations, supply chain, and products and services. Jet Aviation's commitment to compliance with the Act is outlined in the General Dynamics Standards of Business Ethics and Conduct (the "Blue Book") and Jet Aviation policies.

We set clear expectations of our suppliers in the Blue Book, General Terms of Purchase and Payment ("General Terms") and Supplier Code of Conduct. The General Terms and Supplier Code of Conduct require that suppliers confirm their compliance all applicable laws, regulations and policies in the country or countries in which they operate and/or services are provided. All suppliers undergo a standard and mandatory due diligence screening process although some suppliers decline to complete the process.

Jet Aviation's employees are employed in accordance with applicable legislation and our policies and procedures. We also ensure that any recruitment agency or labour hire company we use for the placement of staff follows and complies with the regulatory terms and requirements specific to the labour hired as well as to confirm the identity and right to work of individuals placed with us. Jet Aviation treats all of our employees and externally hired workers with dignity and respect and provide them with fair compensation and equal employment opportunity. We stand behind basic universal human rights, including that employment must be voluntary and oppose modern slavery and human trafficking in all forms.



Jet Aviation has a whistleblowing policy that provides a confidential mechanism for individuals to disclose concerns regarding modern slavery risks in Jet Aviation's business. It is the responsibility of all employees to report immediately any concerns or suspicions that modern slavery practices may be present in any parts of our business or supply chain to their Manager, the Head of Legal, or the Ethics Officer.

FBO operational staff must complete general human trafficking awareness training to identify the risk of human trafficking.

Jet Aviation maintains robust ethics and compliance programs and provide all employees with regular training on the Blue Book.

All policies are reviewed regularly to ensure continued compliance with the Act.

#### Assessment of effectiveness of these actions and continued improvement

We recognize that the assessment of the effectiveness of our actions to identify and address the modern slavery risks in our operations and supply chain is complex and ongoing. Jet Aviation is committed to continue to review how we can best assess the effectiveness of our processes.

#### Consultation

This Statement was prepared and drafted in consultation with the entity owned and controlled by Jet Aviation, Jet Aviation Australia (QLD) Pty Ltd. Jet Aviation and its subsidiary and their operational and support function teams were provided a draft of this Statement and given the opportunity to review and provide their feedback.

This Statement was approved by the board of Jet Aviation Australia Pty Ltd on June 20, 2024

Signed

— Docusigned by:

Swawne Keifman

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Name: Suzanne Reifman

Director

Date: June 20, 2024

