



Modern Slavery Statement

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the "MSA") with respect to Portsmouth Aviation Limited ("PA") and its financial year ended 31st December 2020.

How is the Company structured?

PA is a private limited liability company registered in Portsmouth, Hampshire working primarily for defence and commercial clients.

PA sources its goods primarily from low risk countries such as Italy, the United Kingdom and the United States.

The Company's Modern Slavery Policy ("MSP")

The MSP communicates to all staff the company's zero-tolerance approach to modern slavery, its commitment to acting ethically in all its business dealings and relationships, and the systems and controls it has implemented to ensure modern slavery is not taking place in its own business or supply chains.

Under the MSP, it is the responsibility of all staff working for the company to prevent, detect and report modern slavery in any part of the business or supply chains. Staff are required to report unethical behaviour to their line manager in the first instance. PA operates a confidential reporting service, under its Whistleblowing policy, which is available to all staff to report such matters.

PA has incorporated specific prohibitions within its Standard Terms and Conditions of Purchase against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and it requires that its suppliers hold their own suppliers to the same high standards.

If PA should identify a risk of modern slavery within its supply chain, letters would be sent to suppliers assessed to be of high risk setting out the obligations of PA and the supplier under the MSA and requesting the supplier to confirm in writing which steps it has taken – or will take – to ensure that it is not involved with slavery and/or human trafficking.

PA's due diligence processes

In compliance with the MSA, PA has produced this statement for the Board of Directors in respect of the year ended 31st December 2020.

PA has received no reports from staff regarding the business or its supply chains that would indicate any risk of the presence of modern slavery. It has been determined that the company's suppliers are low risk, both in terms of industry sector and country of operation.

How does the Company manage its risk?

PA will take necessary action with any suppliers identified as high risk. PA will monitor the ongoing risk of slavery to the business and supply chain in the preparation of each annual report.

Does the Company provide training for its employees?

The Company provides training regarding anti-slavery to relevant employees.

Is the Group's approach to anti-slavery effective?

PA's Directors consider the Company's approach to anti-slavery to be robust and effective.



Chris Webb
Technical Director
31st March 2021