



MODERN SLAVERY STATEMENT

FY 2017/2018

Harrods AVIATION

INTRODUCTION

- 01 This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“MSA”) and sets out the steps that Harrods Aviation has taken and is continuing to take in order to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
- 02 Modern slavery encompasses slavery, servitude, human trafficking and forced labour. As a leading Fixed Base Operator (“FBO”), we understand that our stakeholders – employees, customers, community and investors – expect us to conduct our operation in a responsible manner. We have a zero-tolerance approach to any form of modern slavery and are committed to acting ethically and with integrity and transparency in all of our business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain. We aim to create a positive and long-lasting impact in the workplace, marketplace, environment and community.
- 03 This statement is made on behalf of Harrods Aviation Limited and its wholly owned subsidiary Air Harrods Limited. Harrods Aviation Limited and Air Harrods Limited are private companies registered in England and Wales with registered company numbers 2043317 (Harrods Aviation Limited) and 3165147 (Air Harrods Limited).

OUR BUSINESS

- 04 Harrods Aviation is the leading business-aviation service provider, offering high-quality FBO services at London Luton and Stansted airports. Both locations have fully equipped hangars for aircraft maintenance and engineering.
- 05 Air Harrods offers bespoke aircraft services to complement those of Harrods Aviation, including carrying out helicopter maintenance, supplying pilots, brokering helicopter charters and arranging executive transfers.
- 06 We employ specialised and highly trained staff and, in respect of our maintenance and engineering business, use aviation products which, by necessity, are manufactured to the highest standards and sourced from highly reputable suppliers. All such products undergo rigorous testing and are produced in high-standard environments in accordance with the requirements of aviation safety regulations.
- 07 While we will continue to be vigilant in monitoring our business to ensure that there is no modern slavery, we feel that our relatively small size, and the technical and highly skilled nature of our business, mean that there is a relatively low risk of any transgression. As at today’s date, we confirm that we are not aware of modern slavery taking place in respect of our staff or in our supply chain.

SUPPLY CHAIN

08 Typically, our suppliers are established and prestigious businesses operating within the global aviation industry, which have their own detailed social and ethical policies and processes. We expect all suppliers to maintain a supply chain that is free from slavery and human trafficking, and will pay particular attention to any new or smaller suppliers and those suppliers with whom we have a closer relationship.

MODERN SLAVERY

09 Harrods Aviation and Air Harrods are committed to creating a working environment that is inclusive and supportive; that is based on mutual respect and trust; and where everyone feels valued. Our Equal Opportunities policy demonstrates our ambition for our staff to enjoy equal opportunity in an environment that is free from discrimination, harassment, bullying and victimisation in all its forms, while promoting dignity and respect for all employees.

10 We have robust internal processes and policies in place to uphold and protect the rights and working conditions of our staff, and to ensure that all Harrods Aviation and Air Harrods employees are of working age and that we are complying with the provisions of the MSA. As well as our Equal Opportunities policy and policies covering matters such as recruitment and hours of work,

we maintain and publicise a Disclosing Confidential Information (Whistleblowing) policy that allows staff to identify and report any potential concerns through the appropriate channels.

11 We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment Procedure and Referencing & Stansted Airside Access policies, which require references covering the last five years. We operate a robust recruitment policy: this includes conducting eligibility to work in the UK, and checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Disclosing Confidential Information (Whistleblowing) policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or about practices within our business or supply chain, without fear of reprisals. These include a confidential hotline number which can be used anonymously if required.
3. Ethics in Business Policy. This policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. This policy is reviewed annually and distributed to all employees to read.

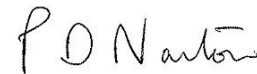
FY 2018/2019

- 12** We recognise that our business and supply chain require constant monitoring for risks of modern slavery. During FY 2018/2019 our key focuses for Harrods Aviation and Air Harrods will be to:
- raise awareness of modern slavery issues by:
 - introducing the topic of modern slavery to our induction training for new starters
 - providing training on the topic of modern slavery to existing employees
 - circulate this statement to all employees via our Q-Pulse system
 - formalise a process detailing the steps to be taken in the event that modern slavery risks are identified within our business or supply chain, and to circulate this to all employees via our Q-Pulse system
- 13** These steps will help to ensure that employees understand the basic principles of the MSA and will encourage them to flag up potential slavery or human-trafficking issues to the relevant parties within the organisation. We believe that this process will help to develop Harrods Aviation's and Air Harrods' effectiveness at mitigating human trafficking and promoting anti-slavery.

CONCLUSION

- 14** This statement reflects the philosophy of Harrods Aviation Limited and Air Harrods Limited and the work undertaken to date to ensure that slavery and human trafficking are not taking place in our business or supply chain. This statement has been approved by the board of directors of Harrods Aviation Ltd.
- 15** Harrods Aviation and Air Harrods will seek to further improve its practices to combat modern slavery.

Signed by:



Paul Norton
Managing Director
Harrods Aviation Limited

31st July 2018



Harrods