

MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

We are committed to improving our practices to combat slavery and human trafficking and our policy is to purchase goods and services produced and delivered under conditions that do not involve the abuse or exploitation of any persons. We are committed to ensuring our employees uphold the highest level of ethical conduct in their day-to-day business and require our suppliers to uphold the same principles. We will not trade with suppliers that cannot or will not commit to practices to combat slavery and human trafficking.

ORGANISATION'S STRUCTURE

We are a provider of in-flight catering, retail and logistics services to various airlines. We are the parent company of Alpha Flight UK Limited ("**Group**"). The Group has over 3,000 employees and operates in the United Kingdom.

The Group has a global annual turnover of over £300 million.

OUR BUSINESS

We operate from 23 facilities across the UK and supply in-flight catering, retail and logistics services to most airlines that fly into or out of the UK. Our services include the supply of passenger meals and retail products for sale on-board flights.

OUR SUPPLY CHAINS

We mainly partner with reputable, established UK businesses which include primary manufacturers, secondary processors and wholesalers. Our primary focus is to maintain short, transparent supply chains which provide us with reassurance our Supply Chain complies with traceability and legal requirements. Our Supply Chain strategy will therefore continue to focus on creating unparalleled Supply Chain Visibility that provides integrity and traceability.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Ethical Purchasing Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our policy is to promote good labour and environmental standards in our supply chains and protect our reputation.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have undertaken:

- Risk assessment of our supply chains.
- Reviewed our procurement policies and other existing policies and procedures relevant to modern slavery.
- Reviewed our existing supplier arrangements, particularly in high risk sectors.

- Updated our standard procurement agreements.

We believe we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme that requires suppliers, including potential suppliers to comply and confirm compliance with the Modern Slavery Act. In addition, our regular auditing of suppliers will now audit their compliance with the Modern Slavery Act.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will, if required, provide training to our staff.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We source goods and services only from reputable and established UK primary suppliers, wholesalers and UK based agents. Where we obtain goods supplied from non-UK based primary suppliers, such goods are obtained on behalf of our customers from their nominated suppliers where such customers are responsible for ensuring compliance by the nominated supplier with the Modern Slavery Act. We also require the nominated suppliers to be bound by our standard supplier terms and conditions which require and mandate compliance with the Modern Slavery act as a condition of such supply.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2016.



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Director
Alpha LSG Limited

Date: 20-09-2017