

**Modern Slavery and Human Trafficking Statement**  
**Chapman Freeborn Holdings Ltd (CFH)**  
28 June 2017

## **Introduction**

This statement sets out the actions taken, and intended to be taken, by CFH and its group of subsidiary companies (collectively, the “**CF Group**”) to comply with the Modern Slavery Act 2015.

The CF Group recognises that modern slavery is an international issue that forces vulnerable people to work illegally against their will.

We are committed to acting ethically and with integrity in all our business relationships and aim to ensure that our employees, subcontractors and suppliers understand our commitment to human rights and are able to identify and report indications of exploitation.

## **Our Business**

The CF Group is primarily engaged in the arrangement of cargo and passenger aircraft charters, together with the provision, and arrangement of, aviation support services. In the cargo market, the CF Group specialises in arranging charters and leases of aircraft for a wide ranging client base including freight forwarders, multinational corporations, governments and humanitarian agencies. Our passenger charter activities service the air travel requirements of multinational corporations, HNWIs, travel industry partners and leading names from the entertainment business.

The CF Group currently employs approximately 250 persons who are located in offices throughout the EU, Middle East, Asia, Oceania and North America.

## **Our Suppliers**

Our supplier network consists predominantly of commercial aircraft operators engaged in the transportation by air of passengers and/or cargo, together with other aviation support services providers, as well as overland and sea transportation companies.

We will not knowingly conduct business with anyone engaged in modern slavery or human trafficking or knowingly permit such conduct to be carried out in any of our supply chains.

We intend to adopt a risk-based approach to the assessment of our business and supply chain, taking geographical, industry and market factors into account in order to identify categories of supply that may present a higher risk of modern slavery being present.

As part of initiatives to identify and mitigate risk the following actions are proposed to be taken:

- building the assessment of slavery and trafficking risk into our supplier sourcing and due diligence processes;
- utilizing, wherever possible, anti-slavery and anti-human trafficking provisions in our contractual arrangements with suppliers;
- assessing whether a formal Supplier Code of Conduct would be an effective tool in areas of the business where a modern slavery risk is identified.

We recognise that improving risk management in this area will be a continuous process. Accordingly, we will assess the effectiveness of our processes over time and, if necessary, further develop our activities in this area in the following years.

## Responsibility

Responsibility for the CF Group's anti-slavery initiatives is as follows:

- **Statement:** The Modern Slavery Statement has been drafted by key personnel and has been approved by the Board of Directors of CFH;
- **Supplier sourcing/ due diligence:** assessment of slavery and trafficking risk as part of supplier due diligence enquiries;
- **Training:** An internal training programme is being developed to ensure understanding of modern slavery. The internet based training resource will be available for all group employees. It is intended to raise awareness and to include identification of modern slavery risks in the supply chain and operations, to promote further transparency and improvements in managing these risks.

## Relevant Policies

The CF Group intends to operate (or update, as appropriate) the following relevant policies:

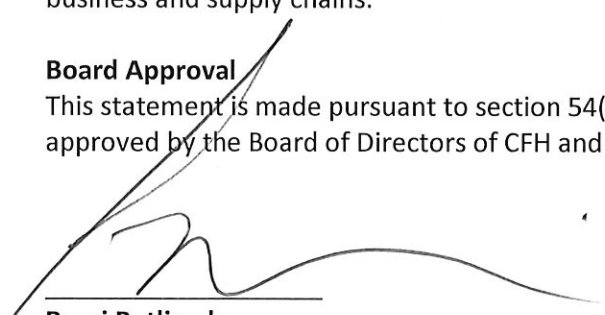
- **Whistleblowing policy:** to encourage reporting of any concerns related to the direct activities of, or the supply chains of, the CF Group. It will be designed to make it easy for all staff to confidentially make disclosures, without fear of retaliation.
- **Code of Conduct:** all employees are required to read and comply with our global Code of Conduct, which will be updated to include a description of modern slavery and human trafficking and which will highlight key risk areas that employees are encouraged to monitor for signs of human rights violations. Employees will be encouraged to raise any concerns they might have in relation to the treatment and working conditions of any person in our business or supply chains.
- **Corporate Social Responsibility policy:** Our CSR policy will be amended to include specific reference to modern slavery.

## Continuous Improvement

We will continue to review, develop and promote our policies and practices in the next year and in following years to identify and mitigate risk areas for modern slavery and human trafficking in our business and supply chains.

## Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, has been approved by the Board of Directors of CFH and will be reviewed and updated annually.



Russi Batliwala  
Group Chief Executive Officer