

**DRAKEN**

2023/24

# Modern Slavery Statement



# Modern Slavery Statement

---

Draken is committed to operating within its code of conduct, ensuring our success is built on trust and integrity, with the straightforward view of “doing the right thing, in the right way, every time”.

In line with the Modern Slavery Act 2015, this statement is issued on behalf of FR Aviation Limited (“FRA”) and all affiliates and subsidiaries thereto, including FB Heliservices Limited (“FBH”), all trading as Draken. This statement constitutes our modern slavery statement for the financial year ending 31 December 2023 and describes the approach and measures which Draken is taking to prevent modern slavery in our business and associated supply chain.

## Business Structure and Supply Chain

We recognise the importance of our supply chain relationships and the role these relationships play in our success. Our integrity and reputation are key, and we are resolute in our commitment to conduct our business in a fair and transparent manner. Quite simply, modern slavery has no place within either our business or our supply chain.

Our business is uniquely diverse, and the programmes we undertake are incredibly varied. Our capabilities include Aircrew Training, Aircraft Engineering & Maintenance, Search & Rescue, Surveillance Operations and Operational Readiness Training.

A significant proportion of our turnover is spent with third parties. In 2023, we spent upwards of £58m across a diverse supply base of over 879 suppliers within our two principal businesses, FRA and FBH. Within the FRA business, the majority of our supply base is centred in the UK (59%), with approximately 11% from Europe, 29% from the USA and Canada and the balance (1%) mainly centred in the Middle East. Our company spend is distributed across multinational organisations and Small-Medium Enterprises (SMEs) alike.

## Due Diligence, Risk Assessment and Management

In order to become a supplier to FRA and its subsidiaries, suppliers are subject to a robust due diligence process, appropriately and proportionately applied to the nature of each engagement. As part of the JOSCAR Buyer community, Draken ensures that our supplier members are questioned, evaluated, and monitored on an annual basis covering the questions attached.

We regularly monitor and review all our suppliers and routinely update and refresh our supplier due diligence process to ensure that potential exposure to modern slavery is kept to an absolute minimum, using a risk-based approach both within our business and within our extended supply chain. As a consequence, we have not identified any occurrences of modern slavery, either within our business or within supply chain in this financial year.

We continue to actively promote awareness of modern slavery within our business and rolling out training to all our employees to ensure that our workforce is able to recognise and quickly act upon any signs of modern slavery.

## Policies

We seek to demonstrate respect for basic human rights through our policies. The following company policies support us in ensuring that modern slavery is not taking place in our supply chains or business:

- Code of Business Conduct

Our Code of Business Conduct is the centrepiece of our commitment to maintaining our integrity. It describes what we must do and how we must behave to ensure that we maintain the trust of all our stakeholders. This includes specific reference to anti-slavery and human trafficking.

- Responsible Supply Chain Management Policy

This policy sets out the basic principles of conducting business in an open, honest, and transparent manner, and the behaviours and practices we expect of our suppliers and partners. This includes expectations for our suppliers to undertake due diligence efforts in relation to their own operations and networks to ensure they are free from slavery and human trafficking.

- Terms and Conditions for Purchase Orders

Our Terms and Conditions include an anti-slavery clause, which also sets out our organisational requirements to suppliers. By accepting our Terms and Conditions of purchase, the supplier is also accepting to abide by our anti-slavery policy.

- Anti-Slavery and Anti-Human Trafficking Policy

This policy outlines our commitment to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

- Inclusivity Policy

This policy which covers the Diversity and Inclusion Policy, Equal Opportunities Policy and Dignity at Work ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated.

- Grievance Policy and Procedures

The grievance policy and procedures provide a process and information for individuals seeking to raise concerns, problems, complaints, or questions arising during their course of employment.

## Effective action taken to address Modern Slavery

Since 2019, we have run a 'See it? Say it...Speak Out' campaign to open channels of communication across the business and to educate employees of their responsibilities regarding ethics and compliance and their roles as guardians of our business reputation. This includes promotion of our 24/7 helpline provided and staffed by a dedicated 3rd party company and available in several different languages.

In 2020, we published our updated grievance policy and procedures to facilitate formal complaints for wrongdoing and introduced our new inclusivity policy. We also established a business-wide Employee Representative Group made up of peer nominated members from each base to provide a formal feedback mechanism to our Senior Leadership Team.

Any Draken contracts with suppliers, contain the company flow downs to ensure that our modern slavery requirements are understood and met. As part of selecting and contracting new suppliers' modern slavery and compliance with Draken requirements is a fundamental area as part of selection and contracting principles.

## Training and Communication

To help our employees identify and address modern slavery risk in our business, the topic is covered in our mandatory annual Ethics and Anti-Bribery and Corruption (ABAC) training and also covered in our code of conduct training, to ensure all employees are aware of the issue and understand their roles and responsibilities.



28 November 2024

---

Sarah Harrison

Chief Financial Officer and  
Company Secretary

---

Date signed

## JOSCAR Modern Slavery Questionnaire (completed by our suppliers)

All organisations operating or doing business in the UK are required to comply with the Modern Slavery Act 2015.

Does your company comply with national or international Modern Slavery legislation in the jurisdiction you are based in, or any jurisdiction that you supply to?

Please select which jurisdictions.

Is your organisation taking any of the measures set out below to ensure that you mitigate modern slavery and human trafficking in your own business and in your supply chain:

Addressed/incorporated modern slavery guidelines into your organisations policies?

Included modern slavery guidelines for your supply chain into your standard terms and conditions with suppliers?

Conduct regular risk assessments of your suppliers against criteria that includes modern slavery?

If directly covered by the Modern Slavery Act 2015, do you train your employees on modern slavery?

I have taken other measures not listed above in relation to modern slavery.

If your organisation has a total revenue of more than £36m you are required to publish a statement on your website concerning your approach to modern slavery. Please confirm (answer Yes to only one of the statements):

Please provide the full website address (URL) where this statement can be found:

Has your organisation previously been investigated or convicted by a competent authority (e.g. a Government organisation or a multilateral body such as the United Nations) or any activities relating to slavery, servitude, forced and compulsory labour and human trafficking?