

Mountfitchet Group – Modern Slavery Statement

Financial Year 2025/26

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”). It is made on behalf of Mountfitchet Limited but also on behalf of certain subsidiaries of Mountfitchet Limited that themselves fall within the scope of section 54 of the Act (the “In Scope Subsidiaries”). Annex 1 to this statement identifies those In Scope Subsidiaries. Annex 2 to this statement identifies those subsidiaries that fall **outside** the scope of section 54 but remain part of the supply chain or the business of an In Scope Subsidiary (“Supply Chain Subsidiaries”).

This statement explains the steps that Mountfitchet Limited and its In Scope Subsidiaries (together “MFG”) have taken and are continuing to take to ensure that modern slavery and human trafficking are not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. MFG has a zero-tolerance approach to any form of modern slavery. It is committed to acting ethically, with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery within its business or supply chain.

MFG Business

MFG is a global aviation, travel, and logistics services organisation, with key brands such as Air Charter Service (“ACS”), an aircraft charter brokerage, and Voluxis, a private jet operator and aircraft management company.

ACS is a world-leading aircraft charter brokerage, procuring private, commercial and cargo aircraft charters on behalf of its clients. Across ACS’s various global entities, ACS arranges more than 30,000 aircraft charters on behalf of its clients annually, generating a turnover in excess of one billion US Dollars each year. ACS is not an aircraft operator and does not own or operate any aircraft. ACS arranges flights on behalf of our clients with FAR Part 135 (or local equivalent) Direct Air Carriers that exercise full operational control of the aircraft.

Another key brand of MFG, Voluxis, is an aircraft operator with two air operator certificates in the United Kingdom and San Marino, offering aircraft management services to aircraft owners, and arranges private and charter flights on those private jet aircraft. Its main offices are located in London Biggin Hill and Farnborough in the United Kingdom.

Modern Slavery Risk Assessment

1. Supply Chain

MFG has assessed the risks of modern slavery and human trafficking throughout its supply chain. As its suppliers are all predominantly in the aviation industry, this presents a very low risk of slavery and human trafficking. Aviation is by its nature an extremely regulated industry with highly trained and skilled staff. This level of skill is reflected in the industry and MFG’s supply chain.

MFG has further assessed the risks throughout each of its subsidiary businesses, including Supply Chain Subsidiaries. Supply Chain Subsidiaries are complementary businesses, with a similarly low risk of modern slavery and human trafficking. To effectively assess and manage risk, Supply Chain Subsidiaries are also subject to the same Policies as MFG.

2. Geographically

MFG recognises that the risks of modern slavery and human trafficking can vary greatly between different regions of the world. As a global company with a strong international presence, MFG remains vigilant to the risks inherent in operating internationally.

As such, MFG is careful to rigorously control each element of its recruitment processes throughout its offices and is careful not to engage any individual who may be considered vulnerable to modern slavery and human trafficking.

MFG centralises its key departments, such as HR, Legal, Compliance and Operations at its London head office and in doing so, it can ensure that the same zero tolerance attitude to modern slavery and human trafficking demonstrated at its head office may be enforced across all its locations.

Policies

MFG ensures that it operates a number of internal policies to enable business to be conducted in an ethical and transparent manner. These policies also apply to its Supply Chain Subsidiaries.

These policies include:

1. Recruitment Procedure

MFG operates a robust recruitment policy, including conducting eligibility-to-work checks on all employees. This eligibility compliance operates to safeguard against human trafficking or individuals being forced to work against their will.

2. Code of Ethics

MFG's Supplier Code of Ethics explains the manner in which it conducts business affairs and provides the basis of how, as an organisation, it expects its suppliers to act when providing services.

3. Whistleblowing

This explains that employees are protected if they make a disclosure related to wrongdoing in the company.

Training

MFG's employees are trained to be vigilant to the signs and risks of modern slavery and human trafficking, both in its supply chain and in conjunction with its customers, and know how to report any concerns they may have in accordance with its whistleblowing policy.

In addition, employees with direct responsibilities for engaging with suppliers and customers also undertake bespoke anti-slavery and human trafficking training.

The same training provided to MFG employees, is provided to the employees of Supply Chain Subsidiaries.

MFG Suppliers

MFG Suppliers and suppliers to Supply Chain Subsidiaries are required to read and acknowledge MFG's Code of Ethics so MFG may ensure it does not engage with suppliers (either directly or through a Supply Chain Subsidiary) who do not align themselves with its own ethics and high standards.

More specifically, ACS as an aircraft charter brokerage arranges aircraft charter flights directly from aircraft operators and airlines. ACS maintains a preferred supplier list and conducts due diligence on its suppliers.

Furthermore, as an air operator certificate holder, Voluxis conforms to all the strict requirements dictated by the UK and San Marino Civil Aviation Authorities. Voluxis' suppliers are primarily airport service providers, which means that they carry out duties airside at airports which are licenced by the International Civil Aviation Organization (ICAO). Therefore, stringent levels of safety and security are required at all times, making any potential risks very low.

Key Performance Indicators

MFG understands the effectiveness of the steps it is taking to ensure that modern slavery and human trafficking is not taking place within its business or supply chain as:

- MFG monitors the responses from both airline suppliers and non-airline suppliers, all of whom are requested to sign and adhere to its Code of Ethics;
- MFG reviews its modern slavery policy and statement annually to discuss any current areas or new areas of concern; and
- MFG provides guidance internally to enable early identification of potential risk factors regarding the clients requests for aircraft charters.

Next Steps

MFG continues to build on its policy by reviewing and reinforcing steps currently taken to carry out due diligence on both existing and new suppliers. MFG internally communicates that it will not work with any suppliers who do not have a suitable modern slavery statement or policy, or instead acknowledge MFG's Code of Ethics incorporating such standards.

MFG Modern Slavery Annual Meeting

This meeting took place on 13 May 2026 chaired by the Chief Operating Officer of Mountfitchet Limited and attendees: Group CFO, Group HR Manager and Deputy Group Legal Director.

Approval of this Statement

This statement was approved by the Board of Directors of Mountfitchet Limited on

20 May 2026

Name: Ruan Courtney (Chief Operating Officer)

Signature:



Annex 1 – In Scope Subsidiaries

The following are subsidiaries of Mountfitchet Limited that fall within the scope of section 54 of the Act:

- Air Charter Service Group Limited
- Air Charter Service Limited (a wholly owned subsidiary of Air Charter Service Group Limited)

Annex 2 - Supply Chain Subsidiaries

The following subsidiaries are part of the supply chain or the business of Mountfitchet Limited:

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| • Voluxis Limited | UK |
| • Voluxis San Marino S.R.L. | San Marino |
| • Voluxis FZCO | U.A.E. |
| • Voluxis Asia PTE Limited | Singapore |
| • Mountfitchet Property Limited | UK |
| • ACS Time Critical Services (Houston) Inc. | USA |
| • The Travel Division Inc | USA |
| • The Travel Division Limited | UK |
| • The Travel Division Singapore PTE. Ltd | Singapore |

The following subsidiaries are part of the supply chain or the business of Air Charter Service Group Limited:

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| • ACS Espana – Servicios de Charter Aereo SLU | Spain |
| • Air Charter Service Inc. | USA |
| • Air Charter Service California Inc. | USA |
| • ACS Air Charter Service (Canada) Passenger Corp. | Canada |
| • Air Charter Service (Aust) Pty Ltd | Australia |
| • Air Charter Service FZCO | Dubai, U.A.E. |
| • ACS - Afretamento Aereo Ltda | Brazil |
| • Air Charter Service (Florida) Inc. | USA |
| • ACS NY Cargo Inc. | USA |
| • ACS Air Charter Service (Canada) Corp. | Canada |
| • Air Charter Service Trucking Inc. | USA |
| • ACS (Texas) Air Charter Service Inc. | USA |
| • Air Charter Service Boston Inc. | USA |
| • ACS Air Charter Service Quebec Inc. | Canada |
| • Air Charter Service Georgia Inc. | USA |
| • Air Charter Service Delaware Inc. | USA |
| • Air Charter Service Illinois Inc. | USA |
| • Air Charter Service Mexico City, S. DE R.L. DE C.V. | Mexico |
| • Aircraft Chartering Services SAS | France |
| • ACS Air Charter Service (Ireland) Limited | Ireland |
| • Air Charter Service GmbH | Germany |

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| • Air Charter Service (ACS) Switzerland SA | Switzerland |
| • ACS Time Critical Services GmbH | Germany |
| • Air Charter Service Italy S.R.L | Italy |
| • Air Charter Service Kazakhstan LLP | Kazakhstan |
| • Air Charter Service Leasing Limited | UK |
| • ACS Air Charter Brussels S.R.L | Belgium |
| • Air Charter Service (Singapore) Private Limited | Singapore |
| • Air Charter Service (HK) Limited | Hong Kong |
| • Air Global Business Services (Shanghai) Co. Ltd | China |
| • Air Global Business Services (Beijing) Co. Ltd | China |
| • ACS Air Charter Service India Private Ltd | India |
| • ACS Air Charter (Pty) Ltd | South Africa |
| • Simunye Air Charter (Pty) Ltd | South Africa |
| • Air Charter Service LLC | Saudi Arabia |