

## **Modern Slavery and Human Trafficking Statement** (the “Statement”)

### **1. About Dubai Aerospace Enterprise**

Dubai Aerospace Enterprise (DAE) Ltd (together with its subsidiaries, “DAE”) is a global aviation services corporation headquartered in Dubai, United Arab Emirates. DAE serves over 170 airline customers in over 65 countries from its seven office locations in Dubai, Dublin, Amman, Singapore, Miami, New York, and Seattle.

The global nature of our business means that DAE and its employees interact with customers and suppliers throughout the world. We are committed to achieving a sustainable business model, including commitments to environmental sustainability, positive impacts, and excellence in corporate governance.

DAE has a comprehensive Code of Conduct in which we set out the ethical standards to which we expect our employees to adhere. We have a zero-tolerance approach to any form of slavery or human trafficking and require this same standard from our employees, customers, investors, suppliers, and stakeholders.

### **2. Overview of this Statement**

DAE adheres to all applicable anti-slavery and human trafficking laws in the jurisdictions in which we do business. These laws include (but are not limited to) Federal Law No. 51 of 2006 as amended by Federal Law No. 1 of 2015 in the United Arab Emirates, the Criminal Law (Human Trafficking) Act 2008 to 2013 in Ireland, and the Modern Slavery Act 2015 in the United Kingdom (the “**UK Act**”).

### **3. Commitment to the United Nations Sustainable Development Goals**

DAE is committed to supporting the United Nations (the “**UN**”) Sustainable Development Goals (the “**Goals**”). The Goals constitute a universal call by the UN to end poverty, protect the planet, and improve the lives and prospects of everyone, everywhere, by the target date of 2030.

In particular, DAE is committed to UN Goal 8 (Decent Work and Economic Growth), which aims to eradicate forced labor, end modern slavery and human trafficking, and prohibit and eliminate child labor globally. UN Goal 8 also features the protection of labor rights and promotes a safe and secure working environment for all employees.

### **4. Our Employees**

DAE is dedicated to creating a workplace that respects each employee’s human rights, and ensures that the employment conditions of our people, and the interactions of our people with customers, vendors and other business partners are consistent with the regulations and laws in the jurisdictions in which we operate.

We are committed to equality of opportunity in employment to all qualified persons. Although particular legal provisions may differ in the various locations in which we do business, our principles are the same worldwide.

In line with the provisions of the United Nations Framework and Guiding Principles on Business and Human Rights, we prohibit the employment of forced, compulsory, and/or child labor. We operate in compliance with all relevant laws and regulations that have an impact on DAE relating to and preventing forced, compulsory, and/or child labor.

### **5. Our Customers**

DAE takes appropriate steps to verify, evaluate, and mitigate the risk that its assets and/or services may be used by a customer for the commission of slavery or human trafficking. As part of the on-

boarding process, DAE carries out customer due diligence which includes a series of checks on the customer, its directors, shareholders, and beneficial owners, an analysis of the customer's commercial activities, and a review of publicly available information in order to identify any causes of concern for DAE.

## 6. Our Supply Chain

DAE has a global network of suppliers to support its business and takes steps to evaluate and mitigate the risk that any activity relating to slavery and human trafficking may occur in its supply chain. DAE may perform due diligence on its suppliers and contractors at the start of a business relationship.

DAE has an Independent Contractor Code of Conduct (the “**Code**”) which outlines the conduct that is expected of the independent contractors who do business under DAE's name. This Code includes an obligation on contractors to adhere to all local laws and regulations, including laws prohibiting slavery and human trafficking.

To minimize the risk of slavery and human trafficking in its supply chain, DAE conducts regular supplier screening and evaluation on its major suppliers, which includes ESG screening covering the risk of slavery and human trafficking. The supplier screening also covers key areas of workplace health and safety.

## 7. Our Policies and Procedures

DAE strives to always act ethically and with integrity and takes a holistic approach to compliance. We have in place a comprehensive framework of policies and procedures to help to mitigate the risk of slavery and human trafficking, including:

- Know Your Customer (KYC) Policy & Procedures (September 2024)
- Anti-Corruption Policy (including whistleblower information) (April 2024)
- Employee Code of Conduct
- Independent Contractor Code of Conduct

## 8. Compliance With the UK Act

As of the date hereof, the subsidiary UK incorporated companies listed in Appendix 1 are wholly owned by Dubai Aerospace Enterprise (DAE) Ltd and their principal activities are the leasing of aircraft and the provision of services to related group companies. The registered address of all companies is listed in Appendix 1.

This Statement constitutes the Modern Slavery Statement of DAE and its subsidiaries, including the UK subsidiaries listed in Appendix 1, made pursuant to the UK Act, and is signed by the Chief Executive Officer of DAE.

## 9. Queries and Concerns

If there are any queries regarding this Statement, please contact DAE's Legal Compliance Team.

Stakeholders are encouraged to discuss any concerns that they have regarding the potential existence of slavery and human trafficking within DAE. Stakeholders can liaise directly with their relevant contacts in person, by email or by telephone and in accordance with any documentation governing the relationship between DAE and that Stakeholder. Alternatively, Stakeholders may raise concerns through our NAVEX WhistleB Anti-Fraud Helpline [here](#).

## 10. Further Information

Please refer to DAE's Environmental, Social, and Governance (ESG) Reporting, which is available at [www.dubaiaerospace.com/esg](http://www.dubaiaerospace.com/esg) for more details of DAE's ESG efforts globally.

**Dubai Aerospace Enterprise (DAE) Ltd**



Date: 3/6/2025

*Firoz Tarapore*

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**Firoz Tarapore**  
**Chief Executive Officer & Executive Director**

## **Appendix 1: UK Entities**

Entities with a Registered Address of c/o TMF Group, 13<sup>th</sup> Floor, One Angel Court, London, EC2R 7HJ, United Kingdom

AWAS 1251 UK Limited  
AWAS 6832 UK Limited  
AWAS 7014 UK Limited  
AWAS UK 1 Limited  
AWAS UK 2 Limited  
AWAS UK 3 Limited  
AWAS UK 4 Limited  
AWAS UK 39445 Limited

Entities with a Registered Address of c/o Tricor Corporate Secretaries Limited, Suite 5, 7th Floor, 50 Broadway, London, SW1H 0DB, United Kingdom

NAC Aviation UK 1 Limited  
NAC Aviation UK 3 Limited  
NAC Services UK Limited