

UNIVERSAL AVIATION

Anti-Slavery and Human Trafficking Statement

Universal Aviation, together with its subsidiaries and affiliates (“Company”), is committed to maintaining a work environment that is free from human trafficking, forced labor, and unlawful child labor. Our Company is proud to conduct business in a manner that promotes lawful and ethical employment practices, as well as environmental, economic, and social responsibility.

Human trafficking, forced labor, and unlawful child labor are intolerable and unacceptable practices that are wholly inconsistent with our Company’s values. When selecting or evaluating suppliers, we seek business partners who share our ethical standards. Accordingly, we require suppliers to certify in writing that they understand and will comply with our Supplier Code of Conduct, which prohibits human trafficking and the use of child, forced, or coerced labor. We also conduct periodic audits of our suppliers, including announced site visits, to verify compliance with our expectations.

While we do not maintain a comprehensive internal policy beyond the Supplier Code of Conduct specifically addressing modern slavery and human trafficking, we expect all employees and contractors to uphold our core values. We address instances of non-compliance on a case-by-case basis when these expectations are not met.

To promote awareness, we provide training to relevant employees with direct responsibility for our supply chain to ensure they are equipped to identify and respond to risks of modern slavery and human trafficking.

We remain committed to integrity, human dignity, and ethical business practices as we grow our operations and work with suppliers across the globe.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015, will be reviewed annually, and constitutes Company’s anti-slavery and human trafficking statement for the current financial year.

Glossary of Terms

Modern Slavery – A person is exploited and cannot refuse or leave because of threats, violence, coercion, deception or abuse of power. It includes forced labor, debt bondage, servitude, child labor and human trafficking.

Forced Labor – Work or services by a person under threat, penalty or coercion and for which the person has not offered themselves voluntarily. This includes situations where freedom of movement is restricted, wages are withheld or workers are pressured into unfair contracts.

Human Trafficking – The recruitment, transport, transfer, harboring or receipt of people by means of threat, force, coercion, abduction, fraud, deception, abuse of power or the giving/receiving of payments to control a person for the purpose of exploitation. Exploitation may include sexual exploitation, forced labor, domestic servitude or other forms of abuse.

Child Labor – Work that deprives children of their childhood, potential, dignity, education or development and that is harmful to their health, safety or morals. International standards prohibit the employment of children below the minimum legal working age and any hazardous work for persons under 18.