

# Macquarie AirFinance's Slavery and Human Trafficking Statement

## 1 Macquarie AirFinance – An Overview:

Macquarie AirFinance is a global aviation lessor providing aircraft and capital to the world's airlines. Our staff interact with customers, suppliers and business partners throughout the world. In all our interactions and business activities, we are committed to the highest standards of honesty, integrity and transparency. We take a risk-based approach to assessing any form of slavery or human trafficking in our supply chain or business and are committed to requiring the same standards from our staff, customers, investors, suppliers and other stakeholders.

## 2 Macquarie AirFinance and Anti-Slavery and Anti-Human Trafficking:

Macquarie AirFinance supports fundamental human rights as set out in the Universal Declaration of Human Rights and core International Labour Organisation conventions. In line with the UN Guiding Principles on Business and Human Rights, we recognise the duty of States to protect human rights as well as the fundamental responsibility of businesses to respect human rights. We adhere to applicable anti-slavery and human trafficking laws in the jurisdictions in which we carry on business. These laws include the United Kingdom's Modern Slavery Act 2015 (the "UK Act") and Ireland's Criminal Law (Human Trafficking) Act 2008 to 2013.

The UK Act requires that certain bodies corporate and partnerships carrying on a business, or part of a business, in the United Kingdom prepare and publish an annual "Slavery and Human Trafficking Statement". The statement must set out the measures an organisation has taken during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain or within its business. The statement is intended to provide our stakeholders with the ability to make better, more informed choices about the products and services they buy and the businesses they support.

This document (this "Statement") comprises the Slavery and Human Trafficking Statement of Macquarie AirFinance (including Macquarie AirFinance Acquisitions (UK) Limited) for the financial year ended 31 March 2023.

## 3 Risk Assessment:

The commercial aircraft leasing industry is a low risk industry from a slavery and human trafficking perspective. We have a global network of suppliers, including the following:

- manufacturers and suppliers of aircraft, aircraft engines and aircraft parts;
- other aircraft leasing companies from whom we buy aircraft;
- international banks and financial institutions who provide finance to our business;
- aircraft technical service and repair companies; and
- professional advisors, such as law firms and tax and accountancy advisors,

all of which are considered low risk.

Our customers are:

- international airlines who lease and purchase our aircraft; and
- other leasing companies to whom we sell commercial aircraft,

all of which are also considered low risk.

That said, we are committed to mitigating the risk of modern slavery and human trafficking occurring in our business operations and supply chain and, in that regard, we are taking the steps described in paragraphs 4 through 8 below to mitigate those risks.

#### **4 Our Business:**

The aircraft leasing industry, in which we participate, provides capital to aircraft manufacturers and airlines worldwide. Whilst our aircraft are used in over 40 jurisdictions across the globe, our offices are all located in low risk jurisdictions (the United Kingdom, Ireland, Singapore and the United States). Our aircraft are predominantly manufactured by Airbus (in France, Germany, Spain and the United Kingdom) and Boeing (in the United States), both of which have large and complex global supply chains primarily based in OECD countries. The airline industry is highly regulated and airlines and aircraft technical service and repair companies are required to hold all necessary licenses and comply with industry standards (generally FAA or EASA) when operating and maintaining our aircraft.

#### **5 Our Suppliers:**

We take steps to evaluate and mitigate the risk that any activity relating to slavery and human trafficking may occur in our supply chain. In particular, we perform due diligence on all major suppliers or contractors at the start of a business relationship. This due diligence process will (as appropriate) include an analysis of the activity carried out by the supplier or contractor and a review of publicly available information in order to identify instances that may give us cause for concern.

#### **6 Our Customers:**

We take appropriate steps to verify, evaluate and mitigate the risk that our products and services may be used by a customer for the commission of slavery and human trafficking. As part of the on-boarding of customers, we carry out customer due diligence (“CDD”) which includes:

- a series of checks on the customer, its directors, shareholders and beneficial owners;
- an analysis of the activity carried out by the customer; and
- a review of publicly available information,

in order to identify instances that may give us cause for concern. Thereafter and throughout the term of the business relationship, periodic CDD reviews are completed on the customer.

#### **7 Our Workforce:**

We have robust policies and procedures concerning our employees, including screening (including work eligibility checks), employment conditions (including fair pay and hours) and appropriate workplace behaviour. These policies and procedures apply across all employment types and include the following:

- all new employees are subject to prescribed right to work checks (where required) so as to ensure that we do not employ illegal workers;
- all employees are on full written conditions of employment; and
- all employees are paid above the minimum wage applicable to the office in which they work (Dublin, London, San Francisco and Singapore).

## **8 Policies and Procedures underpinning this Statement:**

Macquarie AirFinance has an established set of policies and procedures that govern the way we operate. These are relevant to how we mitigate slavery and human trafficking risks in our business, and include:

- Our Code of Conduct, which incorporates the principles of What We Stand For - Opportunity, Accountability and Integrity. These principles guide Board, management and staff conduct. The Code of Conduct outlines what is expected of employees in relation to managing environmental and social risks in all business activities and outlines mechanisms to raise concerns, including through our whistleblower program. All staff are expected to abide by the spirit, as well as the strict requirements, of the Code of Conduct and applicable policies and procedures;
- Our Environmental and Social Responsibility (ESR) Policy, which establishes processes for assessing, monitoring and reporting on material environmental and social risks across the business. Slavery and human trafficking issues are addressed expressly in our ESR Policy;
- Our Work Health and Safety Policy, which outlines our commitment to operating harm-free environments through maintaining high work, health and safety (WHS) standards and performance across our activities globally;
- Our Supplier Governance Policy, which sets out the principles to help us manage the risks associated with suppliers who provide goods or services to us (including the risk that activity relating to slavery and human trafficking may occur in our supply chain) and which enables us to operate in the ordinary course of business; and
- Our Whistleblower Policy, which outlines circumstances under which a person may raise genuine concerns in relation to improper conduct, the avenues for doing so, the protections that are available to those who report improper conduct, and the investigation process. Improper conduct includes any instance or suspicion of modern slavery or human trafficking.

## **9 Ongoing Monitoring:**

We are committed to continuing to monitor and review (as deemed appropriate):

- the risks in our business associated with slavery and human trafficking; and
- the effectiveness of relevant policies, procedures and controls in this area.

## 10 Queries

If there are any queries regarding this Statement and/or slavery and human trafficking, please contact our Head of Legal – Fleet and Transactions.

## 11 Approval

This Statement is made pursuant to Section 54(6) of the UK Act and constitutes the Slavery and Human Trafficking Statement of Macquarie AirFinance (including Macquarie AirFinance Acquisitions (UK) Limited) for the financial year ended 31 March 2023. It was approved by the board of directors at its meeting on 12 September 2023.



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Eamonn Bane  
Chief Executive Officer  
Macquarie AirFinance

Date: 13 September 2023