

# Modern Slavery & Human Trafficking Statement

Reference: HR-POL-ModernSlaveryHumanTraffickingStatement-v2.0

Version: 2.0

Effective Date: 28/03/2025

Owner: Head of Business Operations / IMS Manager

Next Review Due: 31/12/2025

#### 1 Introduction

This statement is made on behalf of Altitude Angel Ltd in accordance with Section 54 of the Modern Slavery Act 2015. It outlines the steps we have taken during the 2025 financial year to prevent modern slavery and human trafficking in our business and supply chains.

We recognise that modern slavery is a global issue affecting all sectors and supply chains. While Altitude Angel operates in a low-risk industry, we remain committed to upholding the highest ethical standards and maintaining transparency in how we address these risks.

## 2 Organisational Overview

Altitude Angel is a UK-based technology company specialising in UTM and aviation services. We design and deliver innovative software platforms that enable safe and scalable drone operations across the globe.

Our core operations are based in the UK, with a growing network of suppliers, partners, and technology providers, including overseas entities.

#### 3 Our Commitment

We take a zero-tolerance approach to all forms of modern slavery, human trafficking, forced labour, and exploitation. Our actions are guided by the following principles:

- Promoting ethical conduct throughout our operations
- Embedding human rights and anti-slavery awareness into our policies and culture
- Monitoring risks across our supply chain and operational activities
- Holding ourselves and our suppliers accountable



#### 4 Governance and Accountability

The following roles are responsible for the implementation and oversight of our antislavery controls:

Role	Responsibility
Chief Operating Officer (COO)	Ultimate responsibility for ensuring anti-slavery compliance across Altitude Angel's operations
Head of Business Operations	Development and review of internal policies, procurement controls, and risk assessments relating to modern slavery
People and Legal Teams	Support training, contract management, and whistleblowing awareness

#### 5 Risk Assessment and Due Diligence

Altitude Angel's direct operations pose a low risk of modern slavery. However, we apply a structured due diligence process to our supply chain and third-party relationships.

Key controls include:

- Pre-contractual supplier evaluations, including ethical and human rights criteria
- Inclusion of modern slavery clauses in supplier contracts
- Annual supplier reviews, with enhanced scrutiny for higher-risk suppliers
- Internal assessments when onboarding new vendors, contractors, or partners

We focus due diligence efforts on industries, countries, or services that may present elevated risks — including offshore subcontracting, hardware manufacturing, or manual services.

## **6 Policies Supporting Our Ethical Commitment**

Our stance on modern slavery is reinforced through key internal policies, including:

- Code of Conduct
- Recruitment and Selection Policy
- Whistleblowing Policy
- Anti-Bullying and Harassment Policy
- Diversity, Equity and Inclusion Policy
- Supplier Evaluation Procedure
- Corporate Social Responsibility Policy



These are accessible to all employees via SharePoint and are regularly reviewed and updated.

## 7 Training and Awareness

We provide role-specific training to employees involved in procurement, recruitment, and contract management to help identify and respond to signs of exploitation.

# 8 Monitoring and Review

We regularly review our anti-slavery activities as part of our broader compliance framework. This includes:

- · Reviewing supplier risk assessments and evaluations
- Auditing internal processes for alignment with policy
- · Updating this Statement annually, or sooner if needed

Our next formal review will take place in Q4 2025, ahead of the 2026 statement.