



Modern Slavery Statement

1. Introduction

This statement is made by PrimeFlight UK Ltd (company number 14342927, registered office 44-45 Beaufort Court, Admirals Way, London, United Kingdom, E14 9XL) pursuant to section 54(1) of the Modern Slavery Act 2015. It is made in relation to the financial year ending 31 December 2025.

This is the first statement published by PrimeFlight UK Ltd, as the financial year ending 31 December 2025 is the first financial year in which the total turnover of PrimeFlight UK Ltd and its subsidiary undertakings (wherever based) was £36 million or more for the purposes of the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

2. Our organisation and business

PrimeFlight UK Ltd is a subsidiary of Skytanking Holding GmbH and forms part of the Skytanking group. This statement relates to PrimeFlight UK Ltd and each of the operating subsidiaries named in the descriptions of our three service lines (ground handling, engineering and cargo) set out below (together, the "PrimeFlight entities"). This statement is not limited to UK-registered entities: it also covers the operations of those PrimeFlight entities that are incorporated outside the United Kingdom (Skytanking Italy SRL, PrimeFlight Engineering GmbH and PrimeFlight Engineering SUB GmbH), to the extent that they form part of the business and supply chains of PrimeFlight UK Ltd. References in this statement to "PrimeFlight", "we", "us" and "our" are to the PrimeFlight entities.

- ▶ **Ground handling.** Ground handling includes aircraft turnarounds, de-icing, interior cleaning, toilet and water service, passenger check-in, and baggage handling. Ground handling services are provided by PrimeFlight Aviation England Ltd at London Stansted and Manchester, by PrimeFlight Aviation Aberdeen Ltd at Aberdeen, by PrimeFlight Aviation Inverness Ltd and PrimeFlight Executive Ltd at Inverness, and by Skytanking Italy SRL at Verona.
- ▶ **Engineering.** Our engineering services include unit load device (ULD) and pallet construction and repair, together with cabin appearance services such as the maintenance and installation of aircraft seat covers, carpets and curtains. Engineering services are provided by PrimeFlight Engineering Ltd at London Heathrow and Manchester, and by PrimeFlight Engineering GmbH and PrimeFlight Engineering SUB GmbH at Frankfurt.
- ▶ **Cargo.** Our cargo services at London Heathrow Airport include cargo and freight handling, warehousing, security clearance, and border inspection post (BIP) handling services. These services are provided by PrimeFlight Cargo Ltd, PrimeFlight Security Ltd and PrimeFlight BIP Ltd.

Our people operate across these sites and business units, and our operations are supported by a network of suppliers and contractors. We are committed to acting ethically and with integrity, and to maintaining effective systems and controls to prevent modern slavery in our business and supply chains. We have a zero-tolerance approach to modern slavery in all its forms.

3. Our policies

Our commitment is supported by the following policies and processes:



(a) Code of Conduct. Our Code of Conduct is mandatory for everyone working for PrimeFlight. It prohibits child and forced labour and requires that employment is freely chosen. Breaches may result in disciplinary action.

(b) Supplier Compliance Policy. Throughout the financial year, suppliers were expected to comply with the Skytanking group Supplier Compliance Policy, which applies to all suppliers and vendors engaged with the Skytanking group, including direct suppliers, subcontractors and third-party service providers. The policy requires that workers are free to enter into and leave employment of their own free will, and prohibits suppliers from using involuntary labour of any kind (including slave, indentured, debt, forced or prison labour), engaging in any form of human trafficking, requiring monetary deposits, or retaining identity papers or work permits as a condition of work. It also prohibits child labour, requires fair recruitment practices (with no recruitment fees charged to workers), requires working hours and wages to comply with applicable law, and requires suppliers to carry out due diligence on their own suppliers and partners and to maintain grievance mechanisms through which workers can report concerns without reprisal. Skytanking may audit suppliers' compliance with the policy.

(c) Supplier due diligence. Throughout the financial year, suppliers were expected to complete a self-assessment questionnaire, which included questions on forced labour, human trafficking, retention of identity documents and child labour; to comply with our Supplier Compliance Policy; and to be screened against sanctions lists. Responses were reviewed by our Operations Excellence team.

4. Due diligence and risk assessment

As an employer, we provide our employees with a safe and professional working environment and fair compensation, and we are committed to upholding the principles of the International Labour Organization's core labour standards, as reflected in applicable legislation in the United Kingdom and in each other country in which we operate. Accordingly, in our direct labour (individuals employed by any of the PrimeFlight entities), we consider the risk of modern slavery to be very low.

We recognise a greater risk in our indirect labour (agency workers, subcontracted labour and workers in our wider supply chains), as we are at least one step removed from the recruitment and labour practices of the suppliers we engage to help deliver our services. During the financial year, we mitigated these risks through the supplier due diligence process described in section 3, which applied across all our sites. In addition, the Supplier Compliance Policy requires our suppliers to use reasonable efforts to ensure that their own suppliers and partners also comply with its standards, including those relating to labour and human rights, so that these expectations extend beyond our direct suppliers into our wider supply chains.

We expect all business partners to act consistently with the Supplier Compliance Policy and applicable laws. Where a supplier or business partner does not meet these expectations, we will take appropriate remedial action, up to and including termination of the relationship, and will consider the impact on affected workers before doing so.

5. Speak-up and reporting

We foster a speak-up culture where employees, workers, suppliers and business partners can raise concerns confidentially and without fear of retaliation. During the financial year, this was supported by the Skytanking group Whistleblowing Policy, which applies to the PrimeFlight entities. Concerns, including any relating to modern slavery or human trafficking, may be raised openly or anonymously with a supervisor or manager, with Legal & Compliance, or through our web-based whistleblowing channel, WhistleB, where reports can be filed anonymously and in local language, 24/7. The channel is run by an independent external provider. Messages are encrypted and metadata, including IP addresses, is deleted so that whistleblowers can remain anonymous, including in any follow-up dialogue.



Reports are handled confidentially by a designated whistleblowing team. Anyone raising a concern in good faith is protected from dismissal, sanctions or any other disadvantage, even if they turn out to be mistaken. Retaliation against whistleblowers, and undue pressure on anyone involved in an internal investigation, are prohibited and will result in disciplinary action.

We expect our suppliers to promote a similar speak-up culture and to provide reasonable means for their own workers and business partners to raise concerns.

6. Training and awareness

We raise awareness of our Code of Conduct and related policies among our people, including awareness of the indicators of modern slavery and human trafficking and how to report concerns, and require them to read, understand and apply the Code. Directors, managers and function heads have a special duty to lead by example and to create an environment in which employees feel able to raise concerns.

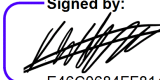
7. Further steps

PrimeFlight is committed to continuous improvement in addressing the complex issue of modern slavery. Following the financial year covered by this statement, we adopted a Procurement and Purchasing Policy (in March 2026) and a Know Your Supplier (KYS) process (in September 2026). Following our review of the steps taken during the financial year to combat modern slavery in our business and supply chains, we intend to build upon our existing policies and procedures. This includes embedding the Procurement and Purchasing Policy and the KYS process across our supplier base, developing performance indicators to measure the effectiveness of our measures, rolling out targeted training to higher-risk functions such as procurement and human resources, and increasing awareness of modern slavery risks across the business more generally.

8. Governance and approval

This statement has been reviewed and approved by the board of directors of PrimeFlight UK Ltd on its own behalf and on behalf of each of the other PrimeFlight entities.

Performance indicators to measure the effectiveness of the measures described in this statement were not in place during the financial year covered by this statement. We are developing such indicators in 2026 and intend to report against them in future statements. The indicators under consideration include: the percentage of suppliers completing the self-assessment questionnaire and KYS screening; the number of suppliers identified as higher risk and reviewed; training completion rates; the number of whistleblowing reports relating to modern slavery and their outcomes; the number of supplier audits conducted; and the number of remediation cases and their resolution. This statement will be published on our website and reviewed and updated annually.

Signed by:

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Sascha B. von Wolfersdorf

Director, PrimeFlight UK Ltd

29 October 2026

witness: Amir Ibrahim