



Manchester Airports Group

# Modern Slavery Statement

For the year ended 31 March 2025



# Introduction

At MAG, we remain committed to doing all we can to prevent and eliminate modern slavery.

We understand the critical role that MAG plays as an international airport group and the influence that brings across our supply chain. We continue to work with our external strategic partners at each airport to improve our practices and to lead the way in identifying risks and speaking out when instances of modern slavery are found.

MAG is a member of Slave-Free Alliance, a leading non-profit organisation dedicated to addressing modern slavery in organisations and supply chains globally. Our partnership forms an important and central foundation to assist us in training our colleagues and improving how we tackle modern slavery across our business. This year we have worked with Slave-Free Alliance to refresh our 3-year strategy and plan.

This year's statement sets out the further steps we have taken to prevent slavery and human trafficking from taking place in any part of our business including our supply chain.

MAG partner with Ecovadis, a sustainability

ratings company that evaluates how well our supply chain has integrated the principles of sustainability, including labour and human rights, into their business management systems and working practices.

This gives MAG visibility of modern slavery risk indicators over all our suppliers, based on their industry and country of operation. MAG uses this data to make informed decisions and act as required, including requesting full sustainability assessments from preferred suppliers.

We continue to evaluate the risks specific to the MAG supply chain and actively engaged with suppliers to understand as much as possible about our sub-tiers.

Our objective is to work collaboratively with our preferred suppliers to deliver ethical, sustainable procurement and align with our wider Sustainability goals.

We are fully committed to doing all we can to prevent and eliminate modern slavery and working to ensure it can never gain a foothold. Our Board, and everyone at MAG, is fully committed to delivering this essential objective.



Charlie Cornish  
Chair



Ken O'Toole  
Group Chief Executive

Publication of this statement has been developed in accordance with Section 54 of the Modern Slavery Act 2015 and covers the financial year ending 31 March 2025.

This statement is made and issued on behalf of the Manchester Airports Holdings Ltd, the parent company of Manchester Airports Group and is fully supported by MAG's Board of Directors. It was approved by the Board on 24 July 2025.

# Our progress this year

Some of our key achievements in relation to modern slavery this year include:

## Our strategy



Slave Free Alliance facilitated a series of workshops for the Modern Slavery Working Group members, including representation from Border Force and Police to support the updating of our Strategy and Action plans.

The CEO of Hope for Justice and Slave Free Alliance joined members of the MAG Executive Team and CEO to share valuable external insights in relation to Human Trafficking, the evolving challenges, and our new strategy. Robust and engaging discussions took place on the opportunities for MAG to collaborate further on the prevention and elimination of Modern Slavery.

Representatives from the MAG Modern Slavery Working Group attended the Slave-Free Alliance Annual Conference in Manchester, which focused on how organisations implemented their modern slavery due diligence processes, using the Organisation for Economic Co-operation and Development (OECD) framework—going beyond case studies to share real operational experiences.



## Our supply chain

We use Ecovadis, a sustainability risk management software to enable us to monitor digital information sources and build a sustainable supply chain “baseline”, which allows us to take informed action as required. As a result, we now have a high-level overview of the Modern Slavery risks posed by all our suppliers with none of our suppliers placed in the “High” or “Very High” risk categories.

In April 2024 we embarked on a supplier engagement programme where, we have invited our preferred suppliers to complete a rigorous assessment of their labour and human rights activities, which has resulted in individual supplier performance scorecards. To date, we have obtained performance scorecards for suppliers accounting for over 80% of our preferred supplier spend. This is a significant step in attaining visibility of strategic high spend suppliers on key sustainability topics including labour and human rights.

Given the significant investment activity we have underway at our airports, we have partnered with Slave Free Alliance to train our construction managers on modern slavery issues and risks in relation to a construction site. Following the training, these managers have access to the Modern Slavery element of the Capital Delivery Companion App to enable the monitoring of our construction sites and activities.

In addition, we have continued to develop our assurance framework at the airports in relation to Commercial and Retail Partners. Existing Retail partners have been issued and have completed a modern slavery questionnaire, developed in partnership with Slave Free Alliance, enabling an assessment of risk. All existing Retail partners have also been loaded onto the Ecovadis IQ system to provide ongoing monitoring and assurance. New Retail partner onboarding processes have been updated to ensure that any new partner to the group will need to have completed the MAG modern slavery questionnaire prior to contracting.

Finally, CAVU have recently appointed a Global Supply Chain Director, responsible for developing the CAVU Supply Chain to support a global growth strategy. Supplier onboarding processes are under review and a full reset of the Supply Chain strategy to include risk management is underway.



## Our airports

We have continued to embed Modern Slavery Champions into operations across all our airports. Champions meet regularly and in collaboration with Border Force and local Police have been undertaking a range of promotional activities to increase awareness for passengers of modern slavery. These events include World Day Against Trafficking in July and Anti-Slavery Day in October. They have also taken part in further training supported by our control authorities and local charities working to eradicate modern slavery, which was designed to embed their learnings and understand how the work they do links in with the safeguarding practices. In addition, at Stansted they have more recently worked with airlines to share the skills they have learned and support 3rd party training events.

MAG commits to release our Champions for up to 2 days per year to increase awareness of Slavery and Trafficking amongst our colleagues and the travelling public.

We continue to review our leaflets and digitalised Modern Slavery information and materials which are available to airport passholders. This includes examples of modern slavery, the signs that somebody may be a potential victim and emergency contact details if modern slavery is suspected.

The Blue Heart Campaign is promoted across our airports in support of the United Nations campaign. It encourages everyone to take action to help stop human trafficking and fight its impact on society. On completion of our Modern Slavery training, security and customer services colleagues will wear a Blue Heart badge to demonstrate MAG's support for this campaign.

Working with our on-site partners (such as Airport Police, UK Border Force and Chaplaincy) at each Modern Slavery Working Group meeting we share and discuss

the number of potential human trafficking cases being reported at our airports which helps inform our communication approach.

At East Midlands Airport we have developed a relationship with the Modern Slavery Policing Unit based in Enderby, Leicestershire. Their lead has supported us in delivering training to our Senior and Airport Leadership teams and to our Operational Colleagues.



## Our people

We continue to proactively monitor completion rates of the online annual training at the Modern Slavery Working Group meetings to measure our effectiveness and, by 31 March 2025, the completion rate was 87.5%. We will be analysing this data further at our next meeting and exploring the steps we need to take to improve this completion rate.

We continue to regularly monitor our debt bondage review controls, and colleagues' addresses. No issues have been identified following these processes.

The training team champion at Manchester has been working with Greater Manchester Police Programme Challenger unit which focuses on serious and organised crime which enables us to keep Modern Slavery training content for colleagues across all our airports up to date and relevant.

As outlined above, we have proactively raised awareness across our airports on key global events such as World Day Against Trafficking; Anti-Slavery Day and International Day for the Abolition of Slavery, through a range of communication media for our colleagues.

# About our business

## Our business

With its headquarters in Manchester, UK, MAG is a unique global travel business.

It owns and operates Manchester, London Stansted and East Midlands Airports, making it the largest group of airports in the UK.

Set to spend more than £2.5bn over the next five years on its airports, it is the largest private investor in transport infrastructure outside London.

MAG's airports served more than 65m passengers in the year to 31 March 2025. The group prides itself in making travel accessible to all, providing options for everyone, regardless of their personal circumstances. Its airports connect people and businesses to more than 200 destinations globally with more than 60 airlines. One in five UK air passengers used a MAG airport last year.

Through digital travel services business CAVU, MAG is increasingly spreading its international reach. It currently has operations in a global list of countries, ranging from the United States and mainland Europe to Australia. These operations involve the distribution of travel products like parking, hotels and insurance, as well as the operation of physical services like airport lounges.

More than 42,000 people are employed on MAG's airport sites, either directly or through other organisations supporting its operations, such as airlines, retailers and ground handlers.

MAG's unique story has been made possible by its ownership model, which brings together public and private sector shareholders that have a shared long-term vision to grow the business in a sustainable and socially responsible way.

Its shareholders are Manchester City Council (35.5%), IFM Investors (35.5%) and the nine other Greater Manchester local authorities (29%).

## Working together for a brighter future

MAG has a duty to minimise its impact on the environment and maximise the support and benefit it offers to the areas it serves.

MAG's commitment to implementing effective sustainability practices continues to be independently recognised. This year, we retained our five-star GRESB Environmental, Social and Governance (ESG) rating, and achieved a gold standard Ecovadis awards which placed MAG in the top 5% of the more than 130,000 companies assessed globally.

MAG's new sustainability strategy is being published in May 2025. Centred on two pillars, 'Protecting the Environment' and 'Community at our Core', the strategy seeks to ensure that MAG continues to prioritise sustainability, to deliver growth that benefits local and regional communities.

Details of the strategy can be found [here](#)

## Our values and vision

Our values are the guiding principles for our business and our people. They are a reflection of who we are, and who we want to become; shaping decision-making, behaviours and ways of working. We have five core values:



**People at our core**



**Growing every day**



**Safe hands**



**Power of teamwork**



**Sustainable future for all**

You can read more about our values [here](#).

Our role is to connect our customers to the world with great airport experiences and innovative travel services.

Our vision is to be a world-leader in the provision of airport facilities and travel services, delivering value for all our stakeholders. We are on a mission to make our airports and travel services the number one choice for travellers and airlines.

We are working to achieve this through the pursuit of seven strategic priorities:

- 1 Deliver great customer service and operational excellence
- 2 Grow our core airports business
- 3 Invest in our airports to support long-term growth
- 4 Develop and scale CAVU
- 5 Decarbonise aviation
- 6 Achieve sustainable growth in shareholder value
- 7 Develop a brilliant, diverse and inclusive team of people who share our values

## Our governance

We recognise that modern slavery is a constantly evolving area and therefore it is important to continue to develop and strengthen MAG's organisational strategy and operational activities accordingly.

Our Modern Slavery Working Group continues to drive the development and delivery of our strategy across the Group. This includes partnering with Slave-Free Alliance to ensure recommendations are implemented in ways that are effective and proportionate.

This group includes representation from key functions including Compliance, Operations (covering Manchester, Stansted, and East Midlands Airports), CAVU, Procurement, our Technical Training department, UK Border Force, Local Airport Police, Chaplaincy, Commercial, Capital Delivery, Assets, People, and Risk & Audit. The Terms of Reference for this group provide clarity on purpose and accountability and is updated as appropriate.

The Modern Slavery Working Group reports into MAG's Executive Committee, which has ultimate accountability for our strategy on modern slavery. During the financial year reported on, executive sponsorship of our modern slavery agenda sat with the Chief People Officer.

Our modern slavery action plan captures and enables monitoring of progress against our strategy.

Modern slavery risks are recorded within our company risk management system and our Risk Management team regularly work alongside MAG colleagues to review modern slavery risks across our activities and the three key areas of Operations, People and Procurement.

To ensure appropriate ongoing governance, MAG's compliance with modern slavery requirements has been added to the organisational corporate register. This outlines the risk and details of the controls in place to mitigate it. It also includes further actions, action owners and due dates for implementation. This detail is regularly reviewed as part of MAG's organisational risk management.

Our Whistleblowing procedure and independent hotline (provided via Safecall) enables colleagues to report any concerns relating to modern slavery. In line with this, as part of our monitoring activities we check whether any concerns have been raised regarding modern slavery within our colleague population and during 2024/25 financial year, there were none reported.



# Our risks and how we manage them

We have three key areas of risk that modern slavery presents to our business, and which we consider when reviewing risk and developing our plans:



## Our people

MAG colleagues, contractors (including temporary staff) and third-party airport-based colleagues being trafficked or used as modern-day slaves



## Our airports

Our airports being used as a route through which people are trafficked (knowingly or unknowingly)



## Our supply chain

Our suppliers bringing modern slavery into our airports, or allowing it to take place in their operations

## Our people

We continue to believe the current level of risk within the business among colleagues is low. This is due to the highly regulated nature of our business, which requires robust and extensive colleague checks in the recruitment process and ongoing 'in employment' checks for some roles. The UK National Aviation Security Programme (NASP) requires that appropriate recruitment and vetting must be in place for those persons undertaking Aviation Security Activities and Functions. Periodic Civil Aviation Authority audits are conducted to verify these checks are in place.

As well as our robust vetting and Right to Work checks, face-to-face security vetting interviews are conducted for all new and existing (periodic renewals) colleagues, regardless of role or pass type, with physical ID checks completed at the same time.

MAG has an ongoing requirement for temporary labour, and staff for these roles may be recruited by third party agencies. All agencies used by MAG are suppliers and are therefore subject to our supply chain due diligence and controls. Our managed service provider ensures that the risk from a contingent & temporary staff perspective is low. The provider takes a proactive approach to tackling modern slavery with relevant policy guidance, through enhanced right to work checks and ISO certified quality management procedures to make sure we are recruiting people who are eligible to work in the UK.

We have well established processes in place for reporting concerns through our Whistleblowing Policy, via our external partners Safecall Ltd, or by using the internal grievance processes.

## Our airports

Human trafficking through our airports is an inherent risk within our business. We continue to work closely with specialists and subject matter experts including Slave Free Alliance, UK Border Force, local police forces at each airport to monitor all operations at our airports in a cohesive way.

We can respond quickly where we believe our airports are being used to facilitate human trafficking and, with the support of these specialists, including our own Chaplaincy team, we are able to manage these cases sensitively and effectively.

## Our supply chain

We are committed to complying with all applicable laws and regulations as well as conducting MAG's supply chain activities in a fair, transparent and professional manner at all times. The MAG supply base incorporates a wide range of goods, works and services, with our Tier 1 preferred suppliers being predominantly (over 90%) UK or EU based.

MAG's preferred suppliers are those that MAG Procurement have agreed to contract or order with following a competitive sourcing process or a direct award. These suppliers have completed a rigorous and robust sourcing process with a pre-qualification stage that checks compliance with the MAG Supplier Code, asks questions on slavery and human trafficking and which sets out MAG's standards across our sustainability agenda, including modern slavery. In addition, our Terms and Conditions outlines MAG's position in relation to the Modern Slavery Act 2015.

MAG's spend profile naturally adopts an associated level of risk that reflects the diversity and range of goods and services used by our airports. This year we have acted across three priority areas:

### Systems and Data

We have continued to improve our systems, optimising our activities to create the capability to digitally assess the sustainability performance of our supply chain, including the monitoring of modern slavery risk. Onboarding over c80% of our preferred suppliers spend onto Ecovadis means that our suppliers are actively reporting, via the system, on their organisations' policies and processes on labour and human rights. This enables MAG to assess and monitor suppliers risk performance scores and highlight gaps in labour and human rights practices. Our focus will be to collaborate with those suppliers to share industry best practises as well as support those that have identified gaps, through improvement plans.

CAVU will commence this digital assessment in FY26, with an Ecovadis IQ assessment planned for the global supply chain supporting the business by the end of Q2.

### Strengthening our Selection Criteria

We have developed robust, category specific, criteria to ensure that we are only contracting with new suppliers that support our position on Modern Slavery. Embedded in all our regulated procurements are mandatory questions related to the Modern Slavery Act 2015, that requires businesses with a turnover of £36 million or more to publish an annual modern slavery statement in accordance with the act. In addition, all regulated procurements now include a minimum 10% weighting for sustainability criteria, including labour and human rights. Onboarding onto the Ecovadis platform and provision of a performance scorecard is now a condition of tendering for the winning bidder.

## Improved Supplier Engagement

We continue to strengthen and develop our engagement with suppliers as we know communication and building trust within the supply chain plays a critical role in risk mitigation and disclosure.

We held our first Sustainable Procurement event 'Accelerating Sustainable Procurement' which focused on unlocking supply chain related challenges to drive sustainable value. Suppliers may also utilise online training on sustainability topics including modern slavery via the Ecovadis system.

We engaged in a workshop with one of our strategic framework suppliers on a recently appointed framework (MAG Group Airfield Framework) on modern slavery risk awareness and mitigation. We aim to continue the development of this agenda with a view to grow the engagement across the wider framework.

To demonstrate MAG's own commitment to reducing the risk of Modern Slavery, aligning to our sustainability targets and strengthening supply chain relationships, we have completed an Ecovadis assessment. This resulted in MAG receiving an Ecovadis Gold Rating, placing our organisation in the top 5% of organisations participating in the global programme. We will continue to uphold our standards and strive for continuous improvements in our assessment.



Modern slavery risk is digitally monitored based on country, sector, certifications, and adverse media, in addition to annual fit-for-purpose supplier assessments that produce a supplier sustainability scorecard. Supplier performance is then benchmarked against MAG standards and external key performance indicators and an improvement plan is generated, if required.

Suppliers are supported through online training on various topics within their supply chain with a focus on ESG including modern slavery risk.

Our procurement team is accredited by the Chartered Institute of Procurement and Supply (CIPS), for meeting the CIPS excellence standard in alignment with procurement industry best practice.

CAVU has a separate sourcing and contracting process to MAG, which is currently under review. Global Procurement Principles have been defined, and alignment with MAG Procurement in terms of a Supplier Code of Conduct and Supplier Onboarding will be completed in this coming year. CAVU contracts and standard terms and conditions require adherence with the Modern Slavery Act 2015.

# Our training and education

As a responsible business, we support our colleagues and suppliers to have the knowledge to spot and report any issues relating to Modern Slavery. All MAG colleagues complete the following training and education activities:

A dedicated **Modern Slavery e-learning training module**, which is part of the onboarding process and refreshed annually, that explains the various types of Modern Slavery and Human Trafficking, how to spot the signs and the various routes to report concerns. The module also tests understanding.

## Policies

An e-learning education module which requires colleagues to read all Tier 1 policies when they start at MAG and then again on an annual basis. This includes amongst other key policies:

- Modern Slavery
- Employee Code of Conduct
- Whistleblowing
- Anti-bribery and corruption
- People
- Corporate Social Responsibility
- Procurement and Contracts

We monitor the numbers completed through our eLearning platform.

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## Front-line colleagues receive more in-depth training

We have partnered with Slave-Free Alliance and UK Border Force at Manchester Airport, to review and update our front-line training provision. The improvements included the addition of a case study, more updated information and imagery and the content made more practical and direct to enable colleagues to identify and understand the signs to look for more easily.

Each front line colleague is provided access to the most recent Home Office Modern Slavery Booklet as further reference materials to support them.

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## Procurement colleagues receive additional, specialised training

Given their critical role in managing our supply chain, our colleagues in MAG Procurement complete bi-annual Ethical Procurement and Supply training, which includes modules on modern slavery, anti-bribery, and corruption.

In addition, we have developed a training framework that will support procurement colleagues' development in alignment with their category specific role. This includes the utilisation of the Ecovadis online training academy, with CPD certified modules on topics including labour and human rights at both beginner and intermediate levels.

We continue to work with Slave-Free Alliance on sourcing projects where applicable and identify fit for purpose training as we continue to mature in this area.

## Our Strategic Priorities for 2025/26:



### Our Strategy

We have 5 workstreams that have defined their objectives to support the implementation of the updated strategy. Each workstream has developed a range of actions that will be progressed during FY26.



### Our supply chain

Our target is to maintain performance scorecards including labour and human rights for suppliers representing 80% of our preferred spend in addition to monitoring supplier improvement plans based on modern slavery risk, if required, with all preferred suppliers assessed as medium risk or higher.

All MAG current suppliers, including all existing retail partners will be continuously monitored via the Ecovadis IQ platform to provide ESG monitoring and assurance, including labour and human rights. The retail function will continue to strengthen their due diligence processes by embedding, for new retail partners, a modern slavery questionnaire and ensuring that an Ecovadis IQ score obtained prior to contracting.

Responses to the recently issued retail partner modern slavery questionnaire will be evaluated with the help of the Slave Free Alliance and subsequent action plans will be developed for any retailers of concern.

Specific focus on the MAG strategic frameworks to strengthen our due diligence and Supplier Relationship Management (SRM) processes on modern slavery mitigations.

Ongoing development and delivery of training programs specifically tailored for procurement colleagues and colleagues working on construction projects to help prevent and mitigate various ESG risks and impacts, including the risk of modern slavery within our supply chain.

CAVU will complete an Ecovadis IQ assessment of its supply chain, to identify the risk profile across Labour and Human Rights, to enable us to develop a more detailed action plan from this baseline.



### Our airports

We will launch a customer awareness campaign at all our airports, to raise awareness and clarify the help and support available. This will include dynamic communications for customers including language adjustments, the targeting of high-risk flights or demographics, the use of key messages on our screens, and helpline numbers in discrete areas such as toilets.

We will be exploring with our partners in Border Force the opportunity to collaborate on the promotion of the Blue Heart Campaign in support of the United Nations campaign and will be engaging with our commercial and retail partners to explore how we can collaborate further to create airport wide visibility and collaboration.

We will be leveraging technology to enhance our escalation and reporting practices, developing an internal monitoring solution which allows frontline colleagues to report potential Modern Slavery cases through our Operational Control Centres. Cases will then be monitored through any subsequent investigation and incorporated into our Corporate People Dashboard Reporting to enhance data & trend analysis.



## Our people

We are developing a training assurance plan and framework for passholders to enable the Modern Slavery Working Group to have visibility of the activities happening between MAG, our strategic partners, local police and UK Border Force to minimise duplication and ensure alignment.

We want to make sure everyone at MAG understands the importance of preventing modern slavery, how we report and the steps we are taking to stop forced labour and exploitation. We want our colleagues and partners to clearly know where to go and how to report—just as instinctively as they know to call 999 in an emergency.

We will work to raise awareness with our colleagues about modern slavery and how they escalate a concern, highlight the actions we are taking to prevent exploitation, encourage our colleagues to get involved in anti-slavery initiatives or be a champion as well as share the real-life stories of how our colleagues have acted to prevent a situation occurring or escalating. We will harness the power of awareness events to drive activity and engagement with our colleagues as well as identify any gaps in training and ensure these are completed.

We will strengthen our commitment to preventing modern slavery by embedding rigorous controls, monitoring and audit processes designed to detect and address any colleagues or agency workers who may be vulnerable to exploitation. We will equip every member of our workforce—particularly our leaders—with comprehensive training that builds the knowledge, skills and confidence needed to recognise and report signs of modern slavery. A clear, well-understood internal escalation framework will ensure that any concerns are swiftly flagged, escalated and managed with sensitivity and urgency. Finally, we will continuously track emerging human-rights developments and best practices in the people space, integrating those insights into our policies and processes to keep our approach both current and effective.