Supplier Code of Conduct

2026

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Purpose & scope

About us

MAG is the UK's largest airport group, operating Manchester, London Stansted and East Midlands airports, alongside CAVU, our global travel services business. Our airports are critical transport hubs and international gateways, connecting millions of passengers, businesses and communities every year.

Given the nature of our operations, we maintain high standards of safety, security, resilience, ethical conduct and sustainability. We expect our suppliers to uphold these standards and work collaboratively with us to manage risks including modern slavery, human trafficking, cyber security and other threats that may impact our people, customers, operations and supply chains.

Purpose

This Supplier Code of Conduct sets out the standards and expectations we have of all suppliers, contractors and third parties working with MAG and CAVU.

It outlines the principles we expect suppliers to follow in relation to sustainability, human rights and labour standards, ethical business conduct, safety, compliance and responsible business practices.

We expect our suppliers to uphold these standards within their own operations and, where appropriate, promote equivalent standards throughout their supply chains.

Scope

This Code applies to suppliers, contractors, consultants and subcontractors providing goods, works or services to MAG and CAVU. Suppliers must ensure relevant requirements are communicated to and followed by their personnel and supply chain partners.

The Code supports, but does not replace applicable legal, regulatory or contractual obligations. Where a higher or more specific requirement applies, that requirement takes precedence. MAG will apply the code proportionately, taking account of the nature, geography, scale and risk profile of the supplier and its activities.



MAG's Supplier Code of Conduct

Responsible supply chains

MAG is committed to working with suppliers who share our commitment to responsible and sustainable business practices. We expect suppliers to manage risks within their own operations and supply chains, support proportionate due diligence and assurance activities, and work collaboratively with us to drive continuous improvement. This includes providing reasonable information and participating in relevant assessments, such as EcoVadis, where requested by MAG.

Ethics and business integrity

MAG is committed to conducting business ethically, fairly and transparently.

We expect suppliers to act with integrity, comply with applicable laws and regulations, protect information and maintain high standards of governance, accountability and responsible business conduct.

Labour and human rights

MAG is committed to promoting and protecting human rights and expects suppliers to provide safe, fair, inclusive and respectful working environments.

Suppliers should treat workers with dignity and respect, uphold internationally recognised human rights principles and comply with applicable labour and employment laws throughout their operations and supply chains.

Sustainable supply chains

MAG is committed to creating a sustainable future for all and achieving net zero carbon airport operations by 2038.

We expect suppliers to minimise environmental impacts, comply with environmental legislation and work collaboratively with MAG to improve environmental performance, reduce emissions, use resources responsibly and support long-term environmental sustainability.

Business resilience

MAG is committed to building resilient operations and supply chains that can adapt to evolving risks and disruptions.

We expect suppliers to maintain appropriate cyber security, data protection, asset management and business continuity arrangements, and to work collaboratively with MAG to protect critical services and support long-term operational resilience.

Assurance and compliance

Due diligence and risk assessments | EcoVadis performance monitoring | Audits and compliance reviews | Corrective action plans | Proportionate enforcement for breaches

Ethics & business integrity

Anti-bribery, tax evasion, fraud and corruption

MAG is committed to the highest standards of ethical conduct and has zero tolerance for bribery, fraud, corruption and other forms of economic crime.

Suppliers must comply with all applicable anti-bribery, fraud and economic crime legislation, including the Bribery Act 2010, Criminal Finances Act 2017 and Economic Crime and Corporate Transparency Act 2023, where applicable, and ensure those acting on their behalf uphold the same standards.

Suppliers must not offer, give or accept bribes, excessive gifts, hospitality, improper payments or other benefits that could improperly influence or be perceived to influence, a business decision. Suppliers must not engage in, assist with, or facilitate tax evasion or tax evasion facilitation. Suppliers must act with integrity and transparency and support MAG's fraud prevention and due diligence activities where required.

Sanctions and trade compliance

Suppliers must comply with all financial, trade and other sanctions laws applicable to their business and their dealings with MAG.

Suppliers must not undertake any activity in connection with supplying MAG that would breach applicable sanctions or cause MAG to do so.

Suppliers are expected to maintain proportionate, risk-based checks to identify and manage sanctions risks within their supply chains relevant to MAG.

Suppliers must not engage sanctioned persons, entities or territories in connection with MAG activity.

Suppliers must notify MAG promptly of any actual or suspected sanctions breach, or any change in their ownership, control or circumstances that may affect compliance in their dealings with MAG.

Fair competition and procurement

MAG conducts procurement fairly, transparently and in accordance with applicable legislation. We treat suppliers equally and support fair and effective competition.

Suppliers must act honestly throughout procurement activity, provide accurate information and support fair competition in every dealing with MAG.

Conflicts of interest

MAG seeks to avoid conflicts of interest and to manage them appropriately where they arise.

Suppliers are expected to identify and disclose any actual, potential or perceived conflicts of interest that may affect their relationship with MAG, including situations involving MAG colleagues or their family members or close personal or business associates.

Ethics & business integrity

External announcements & social media

Suppliers must not make public announcements, use MAG or CAVU branding, or refer publicly to the relationship without appropriate prior approval, except where disclosure is legally required.

Prompt payment & working with MAG

MAG is committed to conducting business fairly, transparently and in accordance with applicable procurement requirements. As a signatory to the Prompt Payment Code, MAG is committed to paying suppliers within agreed payment terms and expects suppliers to support fair payment practices within their own supply chains.

Suppliers must only commence work when they are in receipt of a valid MAG Purchase Order and should submit invoices in accordance with agreed contractual and payment requirements.

Speaking up, grievances & whistleblowing

MAG supports accountability and transparency and provides Safecall as an independent, confidential reporting service.

Suppliers and their personnel may use Safecall to report serious concerns about suspected wrongdoing or misconduct. Reports will be handled confidentially and sensitively, with identities protected as far as reasonably practicable. Other operational or commercial grievances should be raised with the relevant MAG Procurement contact.

Supplier grievances that do not fall within whistleblowing statutory definitions should be raised with the relevant MAG Procurement contact.



Human rights & labour standards



Modern slavery & freely chosen employment

MAG recognises the critical and unique role we play as an international airport group and the influence we have across our supply chain. We are committed to preventing modern slavery and promoting freely chosen employment.

Suppliers must comply with the Modern Slavery Act 2015 where required, ensure employment is freely chosen, undertake proportionate due diligence and work collaboratively with MAG to identify, manage and mitigate modern slavery risks across their operations and supply chains.

Fair and respectful treatment

MAG is committed to a safe, respectful and inclusive environment where colleagues, suppliers and third parties are treated with dignity. MAG has zero tolerance for harassment, bullying, discrimination and victimisation.

Suppliers and anyone acting on their behalf are expected to uphold the same standards when interacting with MAG colleagues, customers, suppliers and third parties.

Suppliers must promptly address concerns relating to the conduct of their employees, workers or subcontractors and cooperate with MAG in any required investigation or action.

Health and safety

MAG operates safety-critical activities and compliance with health and safety legislation is an absolute requirement. Through Vision Zero, MAG believes nobody should be harmed by its business.

Suppliers are expected to share this zero-harm ambition, demonstrate strong health and safety leadership, manage risks to as low as reasonably practicable and comply with MAG requirements.

Working conditions, hours & pay

Suppliers should provide fair pay, benefits and working conditions and comply with applicable employment laws relating to wages, working hours, overtime, rest periods and leave.

Freedom of association

Suppliers should respect workers' lawful rights to freedom of association, collective bargaining and representation, and should not disadvantage workers for exercising those rights.

Sustainable supply chain



Environment and energy

MAG expects suppliers to minimise environmental impacts, responsibly manage environmental risks and comply with applicable legislation.

Suppliers should continually improve environmental and energy performance, including pollution prevention, biodiversity protection and responsible use of natural resources.

Suppliers should maintain proportionate environmental and energy management controls, reflecting MAG's ISO 14001:2015 and ISO 50001:2018 certified approach.

Suppliers must promptly report material environmental incidents or regulatory breaches that affect, or could affect MAG.

Net zero

MAG is committed to achieving net zero carbon airport operations by 2038.

Suppliers are expected to support this ambition by measuring, managing and reducing greenhouse gas emissions associated with their operations, products and services.

Suppliers should seek opportunities to improve energy efficiency, adopt lower-carbon technologies and fuels where practicable, and be transparent in reporting carbon impacts. MAG values collaboration with suppliers to drive innovation and accelerate decarbonisation across the supply chain.

Circular economy and responsible materials

Suppliers should seek to minimise the environmental impacts of the materials, products and services they provide through efficient resource use, waste reduction and circular economy principles.

Where practicable, suppliers should consider the use of responsibly sourced, recycled, renewable or lower-impact materials and support opportunities for reuse, repair and recycling.

MAG encourages suppliers to work collaboratively to improve resource efficiency and reduce lifecycle environmental impacts across the value chain.

To support ESG due diligence and continuous improvement, MAG may require suppliers to participate in sustainability assessments, including EcoVadis. Suppliers should cooperate with reasonable requests for sustainability information, evidence and improvement actions relevant to their size, risk profile and relationship with MAG.

Business resilience

Cyber resilience & data protection

MAG is committed to high standards of information security, data protection and cyber resilience across our business and supply chain. As a supporter of the UK Government's Cyber Resilience Pledge, MAG encourages the adoption of recognised cyber security standards and good practice.

Suppliers must comply with applicable data protection legislation, including UK GDPR, and maintain appropriate measures to protect the confidentiality, integrity and availability of information. Suppliers must comply with MAG's Third-Party Information Security Principles, where applicable to the services provided. Suppliers should hold Cyber Essentials, ISO/IEC 27001 or an equivalent recognised standard appropriate to the nature, scale and risk of the services provided.

Where there is any actual or suspected cyber incident, personal data breach or material vulnerability that affects, or could affect, MAG information, systems or services, suppliers must promptly notify MAG. We expect our suppliers to work collaboratively with MAG to continually improve cyber security practices. This includes completing MAG's Third-Party Risk Assessment questionnaire on an annual basis where requested by MAG.

Responsible use of AI

MAG is committed to the responsible and ethical use of artificial intelligence. Suppliers and bidders must use AI lawfully, securely and transparently, whether delivering goods or services to MAG or preparing tender submissions.

Suppliers remain responsible for AI-generated or AI-assisted content and must ensure it is accurate, relevant and not misleading. Tender responses must reflect genuine capabilities and experience. AI must not be used to fabricate information or misrepresent the ability to meet MAG's requirements. Where requested, bidders must disclose material use of AI in preparing a tender submission.

MAG confidential information, personal data or intellectual property must not be entered into AI systems without prior written approval. Any material use of AI in delivering goods or services to MAG must be disclosed where it processes MAG confidential information or personal data, influences material decisions, produces customer-facing outputs, or forms a substantive part of the contracted service. Such use may require MAG's prior written approval.. Suppliers must comply with applicable laws, regulations and MAG requirements.

Asset management

MAG is committed to achieving whole-life value through effective asset management, informed decision-making and long-term planning. Suppliers are expected to apply good asset management principles when designing, delivering and maintaining assets for MAG, including whole-life value, performance, safety, service, risk and long-term sustainability throughout the asset lifecycle.

Site personnel

Suppliers that are required to work on-site must comply with all applicable MAG site, physical, personnel and aviation security requirements. Supplier personnel must complete required screening and training, display and protect access credentials, follow site access controls and promptly report security incidents, suspicious activity or lost passes.

Business continuity

Suppliers must maintain proportionate, documented and tested business continuity, disaster recovery and crisis-management arrangements. Where requested, suppliers must share relevant plans, recovery objectives and test outcomes with MAG, participate in joint exercises and notify MAG of material changes that could affect continuity of supply.

Compliance & assurance

MAG applies assurance proportionately, taking account of supplier risk, criticality and scope of supply. Suppliers must provide relevant information and evidence where requested and address identified gaps through agreed improvement actions.

Assurance		
Area	**Key standards / assurances**	**MAG resource**
Ethics	Bribery Act 2010 / Criminal Finances Act 2017 / Economic Crime and Corporate Transparency Act 2023	Safecall
Fair & Transparent Procurement	The Procurement Act 2023 where relevant	MAG conditions of tendering
Human Rights & Labour Standards	The Modern Slavery Act 2015 / due diligence	MAG Modern slavery statement
Health & Safety	ISO 45001 where relevant	H&S Policy / Vision Zero
Sustainability Assessment	EcoVadis assessment where requested by MAG	EcoVadis sustainability assessment
Sustainable Supply Chain	EcoVadis assessment where requested / ISO 14001 / ISO 50001	MAG Environment Policy MAG Sustainability Strategy
Cyber Security	Cyber Essentials / ISO/IEC 27001/ Third-party risk management (TPRM) assessment	Annual questionnaire: Skyguard Third-Party Information Security Principles (TPISP)
Data Protection	UK GDPR / Data Protection Act 2018	MAG data protection requirements
Asset Management	ISO 55001 where relevant	MAG asset requirements

MAG will:

- Set and communicate clear, proportionate standards
- Provide accessible routes to report concerns and incidents
- Triage issues and involve the appropriate MAG representatives
- Assess the severity, impact and required response
- Agree and monitor corrective action where appropriate
- Use contractual rights where serious or unresolved risk remains

Suppliers must:

- Comply with applicable law, contracts and this Code
- Maintain controls, training and records appropriate to risk
- Identify and manage risks across their operations and supply chains
- Report material concerns, incidents, breaches or changes promptly
- Cooperate with reasonable enquiries and assurance activity
- Correct issues, prevent recurrence and flow relevant standards to subcontractors

⚠ Failure to meet applicable requirements may result in **corrective action, enhanced monitoring, suspension or other proportionate measures**, including termination where permitted by contract.

Raising a concern or reporting an incident

Early reporting enables MAG and suppliers to protect people, operations and the supply chain. Report any material concern or incident that has affected, or could affect, people, the environment, ethical conduct, information, resilience, delivery or MAG's reputation.

How to report

Standard route

Contact the usual MAG procurement contact or **connect.procurement@magairports.com**

MAG triage

Procurement will facilitate the response with the appropriate MAG specialist or business representative.

Independent Reporting Route

For serious or sensitive concerns that fall within the whistleblowing statutory definitions, suppliers can contact Safecall, MAG's independent and confidential whistleblowing service.

Call: 0800 915 1571 (UK)
1 866 901 3295 (USA)
or via the website MAG - Safecall

What happens next?

- **Notify:** Raise the issue promptly
- **Triage:** Direct it to the right team
- **Assess:** Understand risk and impact
- **Act & Review:** Agree action and monitor

MAG reserves the right, upon reasonable notice, to assess compliance with this Supplier Code. Suppliers are expected to promote these standards within their own supply chains and to notify MAG of any actual or suspected material breaches.

Where issues are identified, suppliers should work collaboratively with MAG to agree and implement appropriate corrective actions. While MAG will seek to take a proportionate approach that supports continuous improvement, we reserve the right to withdraw an individual's site access, suspend or terminate contractual relationships where breaches are material, unlawful, repeated, or remain unresolved.

Working together to deliver value

Strong supplier relationships are built on trust, transparency and shared responsibility. By working together and following the principles in this Code, MAG and our suppliers can create long-term value, strengthen resilience and support safe, sustainable and successful operations.

Together we will

- ✓ Deliver lasting value for MAG, our suppliers, customers and communities
- ✓ Build trusted and transparent partnerships
- ✓ Support safe, secure and resilient operations
- ✓ Protect people, information and our environment
- ✓ Drive innovation and continuous improvement
- ✓ Strengthen supply chain sustainability and resilience



Commitment

This Code is intended to support partnership, not simply compliance. By working together and embedding these principles throughout our supply chains, we can manage risk responsibly, unlock opportunities and contribute to the long-term success of MAG, CAVU and the suppliers who support us.

Thank You

