

Manchester Airports Group

Supplier Code of Conduct 2025



Introduction

At MAG, we believe that our core purpose is to connect our customers to the world with great airport experiences and innovative travel services.

We recognise that the way we fulfil our purpose is important to a wide range of stakeholders, including our passengers, colleagues, airlines, and the local communities that we impact and serve. Our suppliers are key to us fulfilling that purpose and helping us to achieve our goals.

We are clear that we will create shareholder value by managing and developing our business in a responsible and sustainable way, that recognises the needs of all our stakeholders and maintains the highest standards of safety and security.

The Supplier Code of Conduct sets out MAG's expectations of ourselves and all those who work with us. We expect supplier performance and standards to meet those contained in this Supplier Code and any other relevant contractual obligations.



Terry Fitzmaurice
Group Procurement & Contracts Director

MAG expects our suppliers to act in a manner that upholds our reputation, whether in delivering goods, services or works on behalf of MAG. The purpose of the Supplier Code is to formally communicate these requirements and expectations. It is freely available to view and can be downloaded from www.magairports.com.

The Supplier Code applies to all Suppliers, Subcontractors and Concessionaires, collectively referred to as our "suppliers". MAG expects our suppliers to treat our colleagues and service partners with fairness and respect, in return we expect our colleagues and service partners to treat our suppliers in the same manner.

Who we are

Manchester Airports Group (MAG) is an international travel services and infrastructure company owning and operating Manchester, London Stansted and East Midlands Airports.

MAG is unique as a business. Founded in Manchester more than 85 years ago, it has grown to become the UK's largest group of airports, with operations spanning the whole of the country and the wider world. In FY25, the Group contributed £11.4bn to the UK economy, served over 270 destinations and supported over 42,000 jobs at our airports.

Manchester Airport

Manchester Airport is proud to serve the North with a wide range of global connections and in FY25 it served 31.1m passengers. It is the only airport outside of London with two full-length runways and is home to 51 airlines serving 206 destinations across four continents. The airport directly employs over 3,400 people and supports a total of 19,400 jobs.

London Stansted Airport

With the largest range of European connections of any UK airport and the simplicity of its single terminal operation, London Stansted Airport served 29.9m passengers in FY25 across 198 destinations. It is the only major London airport with spare runway capacity, and this year secured planning permission to extend the terminal building to accommodate growth and enhance the passenger experience. London Stansted directly employs more than 2,400 people and supports a total of 13,900 jobs on site.

East Midlands Airport

East Midlands Airport offers passengers an effortless and affordable travel experience to popular business and leisure destinations across Europe. As the home of the UK's largest pure freight operation, it powers UK global trade. In

FY25 the airport served 4m passengers across 67 destinations and handled more than 367,000 tonnes of cargo. It directly employs more than 800 people and supports more than 7,800 jobs on site.

CAVU

CAVU provides services to MAG and other airports internationally, spanning digital and e-commerce platforms and physical, in-airport experiences that enhance air travel for passengers. CAVU global travel marketplace extends across 308 airport markets, 48 countries and 3 continents. CAVU also operates 28 lounges across the UK, US and Australia.

Enabling a route to growth for all

"We are investing heavily in our airports to support their growth and improve passenger experience, with plans to invest more than £2.5 billion in our three airports over the next five years." Across our three airports, we welcomed 65m passengers in the 12 months to 31 March, up 6% on the prior year. Our relentless focus on providing choice and value to all travellers is what underpins our strong financial performance, with revenues up 8.4% at £1,342.5m, operating profit rising 9.8% to £263.2m and adjusted EBITDA growing 12.5% to £570.4m.

Aviation growth was driven by both an increase in the number of routes served by our carriers, and in the frequency of services to the most popular destinations with UK travellers. Our airports now connect business and leisure travellers in the North, South and Midlands with more than 270 locations globally.

For more information on MAG's performance, please visit our 2025 Annual Report & Accounts: [Investor Relations | Manchester Airports Group](#).

Our values

At MAG, our values guide everything we do. They reflect our commitment to delivering excellence: for passengers, colleagues and communities, all while driving sustainable growth and innovation.

SAFE HANDS



The safety and security of our colleagues, customers and service partners is our number one priority. We can be trusted to deliver on our promises, acting with the highest standards of honesty, integrity and responsibility. We care about each other's wellbeing and creating a safe space for people to do their best work.

PEOPLE AT OUR CORE



We are all united by a shared purpose to connect people with the world, and we take the time to truly understand what's important to our customers and partners. We couldn't do all this without our colleagues. That's why we're committed to energising and inspiring people and continuously improving the colleague experience.

THE POWER OF TEAMWORK



We believe that we are more than the sum of our parts. That's why we continually seek to work together with our colleagues, partners and communities to reach the best solutions. We are inclusive, respectful, and open to different perspectives. We strive for the success of our teams, airports, passengers and the business.

GROWING EVERY DAY



We are performance-focused, with a commitment to excellence in the delivery of real, tangible results. We keep our finger on the pulse of the industry, responding to the evolving needs and expectations of all our stakeholders. This helps us to continually improve and deliver more value to our customers. We support colleagues in their personal growth journeys and celebrate success.

SUSTAINABLE FUTURE FOR ALL



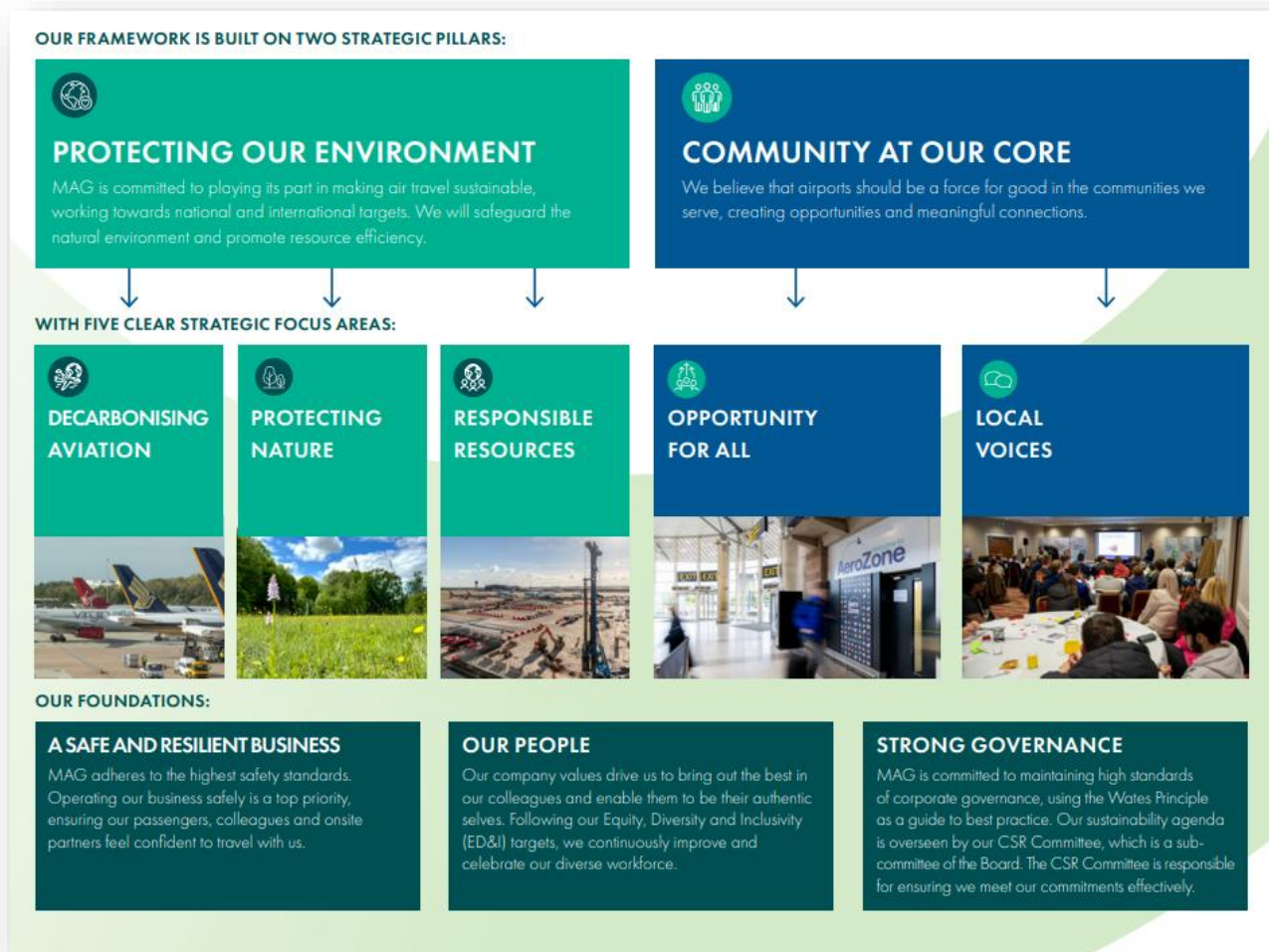
Sustainability is integral to MAG's vision. We are determined to lead the aviation industry toward a net zero future, with ambitious goals to reduce emissions and create a positive impact on the environment. Through collaboration with communities and partners, we invest in initiatives that benefit people and the planet, ensuring that our growth supports long-term progress.

Our sustainable vision

Creating a sustainable future for all

MAG is shaping the future of sustainable travel, minimising the impacts of our operations on the natural environment and acting as a positive force in our communities.

In Spring 2025, MAG published its new Sustainability Strategy: Creating a sustainable future for all. This Strategy builds on the more than two decades of consistent focus that has ingrained sustainability in how we do business at MAG. It is at the heart of our strategic business priorities and Company values. We understand that the sustainability challenges we face are complex, and that is why our approach to sustainability continues to focus both on climate change and decarbonisation, alongside a commitment to preserving the natural environment, promoting equality, providing education and skills opportunities, and supporting the communities we serve.



For more information on MAG's Sustainability strategy 2025 'Creating a sustainable future for all' please visit our website: [Our Sustainability Plans | Manchester Airports Group](#).

The MAG Supplier Code

1. Sustainable Supply Chain

MAG believes that sustainable supply chain management is crucial to the success of our business. We understand that the role we play in managing sustainability within our supply chains will enable us to maximise business opportunities, manage our risks and ultimately build business resilience.

MAG's position

We recognise that our future growth depends on the decisions and actions we take in the short, medium, and long term. Our focus is geared towards category management, continuous improvement and developing innovative ways to procure responsibly through collaboration with our suppliers.

We seek to minimise and control the impact of our airports on the environment and our neighbouring communities by making best use of natural resources. We will continue to strive to align and meet our CSR sustainability targets and these will be embedded as part of the Procurement Sourcing Process and as part of our Supplier Relationship Management programmes.

What this means for suppliers

Suppliers are expected to share our commitment towards responsible and sustainable procurement within their own supply chains. This includes being able to demonstrate their progress relating to communities and protecting the environment. This includes completing a EcoVadis sustainability assessment within six months of contracting with MAG and working with MAG to improve the sustainability performance over time.

As a minimum, MAG expects suppliers to maintain environmental and energy management systems which conform to the standards required for their organisation. Suppliers must also comply with all statutory requirements and protect the environment, preventing pollution wherever possible.

2. Health & Safety

Compliance with Health and Safety legislation is an absolute requirement for MAG. Risks to Health and Safety must be managed with suitable processes and procedures to ensure that the potential for harm is as low as reasonably practicable.

MAG's Position

MAG believes that nobody should be harmed by our business. We call this Vision Zero. We operate safety critical activities at MAG and will never compromise our attention to the Health and Safety of people working on our sites and the passengers using our Airports.

We will constantly challenge ourselves, our suppliers, service partners and other third parties to share in the pursuit of our zero-harm goal.

What this means for suppliers

Suppliers are expected to share our commitment and to deliver high standards in Health and Safety performance as part of a collective responsibility.

This includes demonstrating leadership in Health & Safety, complying with our requirements for the management of Health and Safety, and following the specific rules that are in place at each of our sites.

3. Modern Slavery

Modern Slavery is a crime and a violation of human rights. It takes forms such as slavery, servitude, forced and compulsory labour and human trafficking. MAG understands the critical and unique role that our organisation plays as an international airport group and the influence that brings across our supply chain.

MAG's Position

MAG is committed to do all we can to prevent and eliminate modern slavery. We recognise that modern slavery is a constantly evolving crime and therefore it is important to continue to develop and strengthen organisational strategy, operational activities, and supplier relationships accordingly.

What this means for our suppliers

Transparency within our own business and in our approach to tackling modern slavery throughout our supply chains is key. This is demonstrated throughout our source to contracting process including:

- Conducting supply chain due diligence (both pre and post Contract), including self-assessment, site visits and audits, carried out either by MAG or our appointed advisors, where appropriate
- Training our colleagues
- Working in conjunction with our advisory partner, Slave Free Alliance
- Collaborating with our suppliers to finding solutions
- Developing digital platforms to provide supply chain visibility, including the identifying and management of modern slavery risk indicators

In performing its obligations whilst working with MAG, the Supplier shall ensure that it, and its officers, employees, sub-contractors, and any other persons associated with it, comply with the Modern Slavery Act 2015.

We expect our suppliers to share our firm commitment toward the fight against modern slavery with an approach that is suitable, scalable and fit for purpose to their organisation. In addition, we expect our suppliers to strive towards continuous improvements and work in collaboration with MAG in finding solutions to mitigate modern slavery risks.

Further information can be found in MAG's Modern Slavery Statement, published on [Modern Slavery Transparency Statements - \(magairports.com\)](https://magairports.com/modern-slavery-transparency-statements).

4. Asset Management

MAG's Asset Management Policy outlines our approach to how we acquire, operate, maintain, and dispose of our assets, placing "Whole Life Value" at the heart of asset decision making, ensuring return on investment is maximised over the long term.

MAG's position

Effective Asset Management will enable us to provide best value for our shareholders and customers and be a responsible sustainable business through effective planning, informed decision making and good asset management practice. MAG continually strives to improve our Infrastructure and Asset Management capability to meet our strategic goals.

What this means for our suppliers

MAG expects our suppliers to apply good asset management principles that take a whole life view of the assets they design and create for MAG, and the support services they provide that maintain and sustain MAG's infrastructure. MAG's suppliers have a key role in enabling our assets to deliver the required levels of safety, service and performance at an optimum cost and within acceptable levels of risk to the Business.

5. Conducting our Business

5.1 Working with MAG

MAG is a supporter of the Prompt Payment Code and will pay our suppliers within agreed payment terms. We expect our suppliers to do the same within their own supply chain.

MAG's position

A Purchase Order (PO) will be issued upon agreement of terms between both parties. Suppliers are expected to comply with our requirements and not commence any type of work for MAG until instructed via a PO.

The Supplier should submit invoice(s) as agreed by contractual terms.

What this means for our suppliers

Suppliers must only commence work when they are in receipt of a valid Purchase Order (PO) issued on behalf of MAG. Any work undertaken without a valid PO is done so at Suppliers own risk.

Invoices are to be emailed to invoices@magairports.com.

Your invoice must clearly state a valid PO number and must be submitted in PDF format with only one invoice attached per email. Any invoices received without a valid PO number will be returned unprocessed. For any payment queries please email payments@magairports.com

5.2 Conflict of Interest

A conflict of interest may arise where a supplier has a joint vested interest with a MAG colleague or a person closely connected to a colleague, and vice versa.

MAG's position

MAG seeks to avoid conflicts of interest in our business dealings, but if they do occur then we manage them appropriately.

What this means for our suppliers

Suppliers are expected to alert MAG of any conflicts of interest that may impact on the relationship between MAG and the supplier, even if this could prohibit the supplier from being able to conduct future work with MAG.

5.2 Anti-Bribery, Fraud and Corruption

A bribe is a financial or other type of advantage that is offered or requested with the intention of inducing or rewarding improper performance of a function or activity.

Fraud involves any act of dishonesty intended to secure an unfair or unlawful gain. This includes but is not limited to: False representation of facts, Failing to disclose relevant information, Abuse of position for personal or corporate benefit and Misleading financial reporting or documentation.

MAG's position

MAG is committed to the highest standards of ethical conduct and integrity in all its business activities. MAG has a zero-tolerance approach to bribery, fraud, and corruption, and has robust policies which outline the position on preventing and prohibiting these offences in accordance with the Bribery Act 2010 and the Economic Crime and Corporate Transparency Act (ECCTA) 2023.

What this means for our suppliers

MAG prohibits colleagues from offering, promising, giving, soliciting, or accepting any bribe. Colleagues are also prohibited from accepting or offering any excessive gifts or entertainment. MAG prohibits all forms of fraud,

including false representation, failure to disclose information, and abuse of position for personal or corporate gain.

In performing its obligations whilst working with MAG, the Supplier shall ensure that it, and its officers, employees, sub-contractors, and any other persons associated with it, comply with the Bribery Act 2010, and the Economic Crime and Corporate Transparency Act 2023.

We expect all our suppliers and third-party partners to act with integrity and transparency in all dealings, avoid any conduct that may be considered fraudulent, corrupt, or unethical, and promptly report any suspected fraud or misconduct involving MAG.

Suppliers are also expected to support MAG's fraud prevention efforts by participating in due diligence, audits, and compliance checks when required.

5.3 Whistleblowing

MAG recognises that an aspect of accountability and transparency is a mechanism to give the ability for colleagues to voice concerns in a responsible and effective manner.

MAG's position

We have an independent organisation - Safecall, which allows colleagues to make a completely confidential disclosure.



What this means for our suppliers

MAG will treat all disclosures in a confidential and sensitive manner, keeping the identity of the individual making any allegation confidential. We

require our suppliers to operate a similar mechanism.

5.4 Information Security/Data Protection

MAG's Information Security Policy and Data Protection Policy outline the requirements for protecting against the loss of confidentiality, integrity, or availability of the information that MAG uses to operate its business or handles on behalf of customers.

The UK General Data Protection Regulations 2018 (GDPR) applies to organisations holding information about living individuals in both electronic and paper format and it governs how a company collects, uses, stores, shares and disposes of personal data.

MAG's position

MAG is committed to its compliance with information security and data protection policy and legislation, ensuring best practice when processing personal data about its customers and staff.

What this means for our suppliers

MAG expects all of our suppliers to make the commitment to comply with General Data Protection Regulations and MAG's Third-Party Information Security Principles which can be obtained from our website: [MAG website- Procurement and Contracts page](#).

5.5 Procurement Regulation

Procurement at MAG is regulated in accordance with the Procurement Act 2023. Where relevant MAG would adhere to these procurement regulations utilising the Central Digital Platform for the publishing of tenders. This means some degree of advertising, as appropriate to the size of a contract, is necessary when issuing a planned procurement that fall within the regulations. This ensures transparency, acting with integrity and value for money is achieved.

MAG's position

MAG is obliged to treat all tenderers equally and will adhere to the procurement regulations at all times.

What this means for our suppliers

When issuing a planned procurement notice MAG will be transparent with all tenderers with regards to selection criteria, award criteria and the reasons why they were, or were not successful. We expect suppliers to be open and honest in all of their dealings with MAG and their own supply chain.

5.6 Competition Law

Highest standards of ethical conduct and integrity are critical in supporting the achievement of MAG's strategic and business objectives. Competition law applies to all organisations and seeks to preserve free, fair and effective competition between businesses for the protection of the consumer.

MAG's position

MAG is fully committed to complying with competition law at all times and has a policy that is designed to ensure that we do.

What this means for our suppliers

MAG will not take any action that could be in breach of competition laws. MAG will embed competition law compliance in both our day-to-day and long-term strategic decision making.

5.7 Social Media and External Communication

MAG recognises that social media tools are increasingly used to promote MAG to colleagues, customers, the media and other MAG stakeholders and to share personal opinions.

MAG's position

MAG has an External Communications policy

and a Social Media policy, which is meant for MAG colleagues, suppliers and third parties.

What this means for our suppliers

When engaging in external communications, including social media, you are taking responsibility for what you write and are encouraged to exercise good judgement and common sense. When wanting to create MAG themed communications (e.g., press releases, social media posts, articles etc.) approval from MAG is required.

5.8 Respectful Treatment

MAG believes that all of its colleagues, suppliers and other third parties have the right to respectful treatment.

MAG's position

MAG will not tolerate discrimination, harassment, or victimisation of any form within the workplace.

What this means for our suppliers

MAG expects our suppliers to make the same commitment.

6. Complying with the Supplier Code

MAG reserves the right, upon reasonable notice, to check compliance with the requirements of this Supplier Code.

We expect our suppliers to encourage their suppliers to adhere to the standards upon which this Supplier Code is based, as part of fulfilling their contractual obligations.

MAG reserves the right to terminate contracts in the event of material breach of the principles set out in this Supplier Code.

Manchester Airport Group (MAG)
August 2025