

APPENDIX 1

1. **AGS Group Modern Slavery Act 2015 Statement**

AGS Airports Group Holdings Limited, AGS Airports Holdings Limited, AGS Airports Investments Limited, AGS Airports Limited, Airport Holdings NDH1 Limited, Aberdeen International Airport Limited, Glasgow Airport Limited, Southampton International Airport Limited, BAA Lynton Limited and AGS Airports Pension Trustees Limited (herein referred to as the “AGS Group”) is publishing this statement in compliance with section 54(1) of the Modern Slavery Act 2015.

This Modern Slavery Statement has been approved by the Board of Directors of AGS Airports Group Holdings Limited, on behalf of the AGS Group, 23rd May 2025. Information contained within this statement is correct at the date of publish. It details the steps taken by the AGS Group in order to comply with the provisions of the Modern Slavery Act 2015 to aid the prevention of modern slavery and human trafficking for the financial year ending 31 December 2024.

2. **Our Business**

AGS Airports Group Holdings Limited, owns AGS Airports Holdings Limited, AGS Airports Investments Limited, AGS Airports Limited, Airport Holdings NDH1 Limited, Aberdeen International Airport Limited, Glasgow Airport Limited, Southampton International Airport Limited, BAA Lynton Limited and AGS Airports Pension Trustees Limited and.

3. **Our Supply Chain**

The AGS Group’s supply chain covers many goods and/or services across the group and covers many industry sectors. These goods and/or services are grouped into the following categories:

- Capital;
- Operational;
- Professional services;
- Digital;
- IT Services and Telecoms; and
- Commercial (includes airlines, ground handlers and retailers).

Each department within each of the airport operating companies within the AGS Group will, to a greater or lesser extent, have a supply chain in which it depends on, and the interdependencies of the various departments, as well as the commonality of goods and/or services required across the AGS Group, and which results in some suppliers that have dealings with more than one department and/or airport company.

We have in the region of 1220 suppliers across the AGS Group. Many of these will have turnovers greater than £36 million which trigger the compliance requirements of the Modern Slavery Act 2015 and are required to produce a Modern Slavery Statement. The AGS Group recognises that suppliers under this threshold can still be a risk, however they still go through our onboarding process and rigorous checks.

4. Our Policies

These are our Policies pertaining to Modern Slavery:

AGS Sustainable and Ethical Procurement Policy

Reflects our commitment to acting ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to address the risk of modern slavery and human trafficking within our business or supply chain.

Code of Professional Conduct

To assist in achieving the highest standards of professional behaviour from AGS Group employees in dealings with colleagues, customers, suppliers, and other parties with whom AGS Group has a relationship.

Recruitment Policy

The business has a transparent, thorough recruitment process, which serves as a deterrent from the infiltration of trafficking groups with victims of modern slavery. The AGS Group is committed to applying its equal opportunities policy, at all stages of recruitment and selection process.

Whistleblowing Policy

Primarily covers how to deal with serious concerns in the workplace, where the interests of others or that of the organisation is at risk. We offer three defined channels for whistleblowing and include modern slavery and potential victims of human trafficking in the list of potential disclosures.

5. Due Diligence

Procurement

AGS' Group Procurement perform targeted diligence checks on the AGS Group's supply chain on an annual basis and at the commencement of any new sourcing activity to ensure modern slavery compliance.

Prior to a tender process, all new suppliers are sent a Pre-Qualification Questionnaire ("PQQ") or an Invitation to Tender, which includes a section on modern slavery. The Supplier may not progress beyond the tender stage if they are highlighted as high-risk at this stage.

The AGS Group have delivered on the following recommendations from the SFA Gap Analysis:

- Concession and Management Agreements are now subject to an annual Modern Slavery Review;
- Collaboration with Suppliers to map their sourcing locations of goods provided to the AGS Group. An example of this would be the recent tenders issued for PPE and Uniform;
- Supplier PQQ has been updated to include intelligence driven questions for suppliers. This has now been included in our revised tender process and is allowing us greater visibility into supplier efforts;
- Human rights elements are included in the AGS Group's Sustainability Strategy; and
- AGS Group's Whistleblowing Policy has been amended to include potential victim of human trafficking/modern slavery in the list of disclosures.

6. Risk

The SFA Gap Analysis identified the following four modern slavery risk areas for the AGS Group:

- Concession and Management Agreements;
- Construction and Labour Agencies;
- Uniform Supply Chain; and
- Passengers in transit as potential victims of human trafficking and modern slavery.

Significant progress has been made in relation to these areas to reduce the risks, but efforts will continue in 2025 with the support of SFA to deliver the following:

- Risk Assessment of the AGS Group's Construction Suppliers;
- Risk Assessment of Service Contracting Companies;
- Awareness Campaign; and
- Inclusion of Human Rights and Modern Slavery specific KPIs.

7. Training

Our Executive Team has a strong commitment to understand and manage the risk of modern slavery that cascades into the business and supports the progression of our work. To further strengthen that commitment the AGS Group will provide targeted training in 2025 to AGS Group employees using a SFA E Learning Module on Modern Slavery Awareness.

8. Effectiveness in Addressing Modern Slavery

When the AGS Group engage with a new supplier outwith a tender process, the AGS Group invite the supplier to complete a new supplier form via our onboarding platform, which includes a modern slavery section to satisfy AGS Group requirements in respect to the Act.

AGS Procurement review the response to these questionnaires and determine whether there are any risks associated with the response, assess suitability of the supplier and any steps required to manage the modern slavery risk based on the response provided. AGS Procurement also record any modern slavery risk in the AGS Procurement risk register until mitigation is in place.

Audit

If a supplier provides insufficient details to the questionnaire during the procurement process, or is highlighted as being a high-risk supplier, such as manufacturing companies or uniform providers, AGS Procurement will carry out further investigations into the supplier. This will be completed by carrying out a desk-top audit, a telephone audit or by visiting the supplier's premises to carry out a full audit.

The audit documents delve deeper into a business's ethical behaviour, duty of care to employees, and the policies they have in place to satisfy AGS Procurement that the risk of modern slavery is satisfactorily managed by the supplier. AGS Procurement also provide feedback and corrective actions to mitigate any potential risks.

If after an audit a supplier is deemed to be non-compliant with our standards or the Modern Slavery Act 2015, if within scope, and unwilling to improve, the supplier will be removed from the supply chain, and an alternative supplier will be sourced. The AGS Group monitor all supplier's modern slavery compliance on the AGS Procurement risk register.

During 2024, AGS Procurement continually reviewed all suppliers in the supply chain for compliance with the Act. AGS Procurement conduct quarterly supplier performance reviews ensuring compliance with act where applicable.

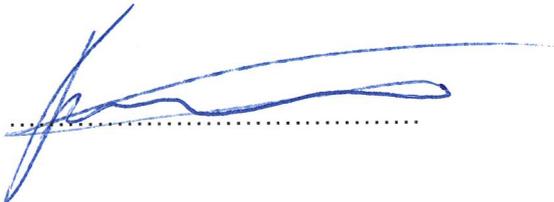
Partnership with Slave-Free Alliance

In 2024, the AGS Group continued its partnership with Slave-Free Alliance ("SFA"), who act as our 'critical friend' in addressing the risk of modern slavery. In 2021, SFA conducted a Gap Analysis to assess the AGS Group's response to address the risk of modern slavery, identified key risks of modern slavery, highlighted areas of good practice and recommended potential areas for improvement.



The AGS Group have made significant progress to understand the risk of modern slavery faced by the business. We have made significant steps in developing our Modern Slavery and wider Human Rights Agenda which will continue throughout 2025 and beyond.

The AGS Group is committed to persistently monitoring and tackling modern slavery and human trafficking. We continually review our approach and focus on continuous improvement to effectively delivery strategies that address the risk of modern slavery.

Signature 

Name KAM JAMOU

Title CHIEF EXECUTIVE

Date 27th MAY 2025