

A child is seen from the side, looking up at a large aquarium tank. The tank is filled with various fish, including several sharks. The scene is lit with a blue light, creating a deep-sea atmosphere. A large, stylized number '7' is overlaid on the image, partially obscuring the text.

Human Trafficking & Modern Slavery Statement 2025

merlin



Foreword

At Merlin Entertainments we have a zero-tolerance approach to modern slavery of any kind. As such we are committed to conducting business responsibly and will always endeavour to ensure that no modern slavery or human trafficking occurs in the operation of our business across the globe.

We are committed to upholding human rights and expect all suppliers and contractors to comply with internationally recognised codes of practice on human rights, employment practices and working conditions.

Fiona Eastwood
Chief Executive Officer - June 2026

One of our core values as a company is “We Care” based on the respect and care of our people and those that work for and on behalf of Merlin. We will always take decisive action to do the right thing and believe that everyone matters, striving to create our places of work and fun to be safe, inclusive and diverse, and where everyone has the same opportunities and respect.

This statement illustrates our approach to preventing modern slavery at Merlin and in our supply chain for the period ending 31st December 2025. We will continue to do the right thing and operate within a framework of continuous self-assessment and improvement.

Merlin's Global Attractions

UK



Windsor



Birmingham
Blackpool
Brighton
Great Yarmouth
Hunstanton
Loch Lomond
Manchester
Scarborough
Weymouth



Birmingham
Manchester



London



London



Chessington



Warwick



London



London



Alton



Birmingham



Blackpool



Edinburgh
London
York
Warwick



Chertsey

40

North America

27

UK

33

Europe

22

Asia

8

Australia

North America



California
Florida
New York



Arizona
Bay Area
Chicago
Columbus
Dallas
Kansas City
Michigan
New Jersey
Philadelphia
San Antonio
Toronto
Westchester



Arizona
California (LEGOLAND®)
Charlotte-Concord
Florida (LEGOLAND®)
Grapevine
Kansas City
Michigan
New Jersey
Minnesota
Orlando
San Antonio



Hollywood
Las Vegas
Nashville
New York
Orlando



Chicago
Dallas
Michigan



Orlando



Florida
Dallas-Fort-Worth

Residences



Dallas
New Jersey
Arizona



Chicago



Washington DC

EUROPE



Billund
Deutschland
Dubai



Benalmadena
Billund (LEGOLAND®)
Blankenberge
Gardaland
Hannover
Helsinki
Konstanz
München
Oberhausen
Paris
Porto
Scheveningen
Speyer
Timmendorfer Strand



Amsterdam
Berlin
Dubai
Vienna



Amsterdam
Berlin
Hamburg



Günzburg



Leidschendam
Shanghai



Lake Garda
Lake Garda



Sotau



Berlin
Oberhausen
Scheveningen



Brussels
Hamburg

APAC



Beijing
Hong Kong
Melbourne
Osaka
Shanghai
Shenyang
Tokyo



Bangkok
Busan
Kelly Tarlton's
Malaysia (LEGOLAND®)
Melbourne
Nagoya (LEGOLAND®)
Seoul
Sunshine Coast
Sydney



Amsterdam
Bangkok
Berlin
Dubai
Hong Kong
Singapore
Shanghai
Sydney
Tokyo
Vienna
Wuhan



Leidschendam
Shanghai



SYDNEY
TOWER EYE
Sydney



Wild Life
Sydney

*Attraction figures as of May 2015

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Merlin It's where we play

Risk Assessment & Consultation Process

During 2025 a broad and continuous consultation process was undertaken with entities within the control of Merlin and internal stakeholders such as Procurement, Merlin Magic Making, People, Internal Audit, Legal and Conservation teams globally. This consultation process took the form of quarterly interactive workshops where the outputs contributed to the up issue of the risk assessment that focussed on:

- Any perceived, ongoing and new risks across the business;
- Any geographic risk or influence;
- Whether there are any vulnerable groups at risk within the dealings;
- The type of products or services being supplied;

- The controls or mitigations in place;
- The residual risk post application of the controls; and
- Work that is needed to reduce the risk further

By conducting regular workshops, all stakeholders were able to update plans and improvements in real time, it also drove collaboration and information sharing across functions and entities to quantify risks within the business associated to Modern Slavery.

This group continues to meet on a regularly to bring together the different entities and stakeholders to ensure a broad review continues to occur and is chaired by the Group Compliance Director.



Policy & Strategy

Merlin is committed to identifying and addressing modern slavery and human trafficking risks in our business and across our supply chains.

As an organisation operating in multiple jurisdictions, we will always comply with local laws and regulations, however where these fall short of our own global standards and policies, we will always aim to go above and beyond local legislation to maintain a high common ethical standard.

Our Human Rights & Modern Slavery Policy reflects our commitment to acting ethically and with integrity in our business activities and relationships. We strive to prevent exploitation and discrimination, to value diversity and inclusion throughout our business, and to provide a safe, secure and healthy environment within which to work.

As part of our ESG strategy, we are committed to leading positive change to increase diversity and inclusion within our workforce and better reflect the diversity of our millions of guests.

ESG Strategy

The Merlin ESG Strategy focuses on three pillars:

- Inspiring People
- Caring for the Planet
- Protecting Nature

The Inspiring People pillar sets out the conviction that “We believe that our world should be a joyful, welcoming and inclusive place for all”. It also sets out ambitions connected to belonging and wellbeing.

More information can be found here:

[Merlin Entertainments | More to your world](#)

During 2026, Merlin will review modern slavery risks and governance in its ESG Council Meetings and also conduct a deep dive of modern slavery risk in the Risk, Control & Compliance Forum to further strengthen its ability to manage and mitigate risk within the business.

Policies

The Speak Up Policy

Merlin empowers all employees to report any concerns relating to unethical business conduct within its direct activities or supply chains.

The policy and independently ran hotline is available to all. It is designed to make it easy for employees to speak up, blow the whistle or make disclosures without fear of retaliation.

This policy was relaunched in 2025 to drive additional engagement, empowering individuals to speak up and report any wrongdoing.

Code of Conduct

This document illustrates the actions and behaviour expected at all times when representing the Merlin, being clear that breach of any policy will not be tolerated.

All employees are required to formally acknowledge that they have read, understood and will adhere to the contents of the Code of Conduct. Their declaration also serves as formal acknowledgement of all Company policies referred to within the Code including policies that have relevance to modern slavery.

Equal Opportunities

This policy is available to all UK employees and extended to other regions based upon local laws, stating all employees should be treated with dignity, respect and consideration at work and does not discriminate against them because of sex, age, gender reassignment, marital or civil partner status, sexual orientation, disability, race, colour, nationality, religion or belief, ethnic or national origin, maternity or pregnancy.

Merlin aims to treat everyone with whom we come into contact, with dignity and respect.

Policies

Recruitment Policy and Code of Practice

These global policies uphold the Equal Opportunities and Human Rights policies through ensuring that all candidates are treated with dignity and respect, and that all applications are handled equally.

Protection of Children & Young Workers

This global policy states our commitment to protecting children and younger workers under the age of 18. It clearly states that Merlin does not tolerate unfair treatment of children or young workers in the workplace and that maximum working hours, working conditions and fair treatment will always be adhered to. Local risk assessments are carried out before employing young workers, and Merlin takes all measures to ensure that child welfare takes priority over business concerns.

Anti Corruption Policy

The Company has a zero tolerance towards bribery, fraud and other types of corruption. This includes participating in any form of facilitation payment during business dealings.

This policy applies to all employees and in addition, all third parties are required to sign up to Merlin's Ethical Dealing Principles which includes a contractual requirement to comply with applicable anti-bribery legislation.

The anti-corruption policy was updated in 2025 along with a training programme to reinforce the principles of doing the right thing.

Policies

Retail Merchandise

Code of Conduct

This Code of Conduct includes sourcing principles to establish the standards for commercial retail suppliers working for and on behalf of Merlin.

Merlin expects third parties to comply with internationally recognised practices on Human Rights, employment practices, working conditions and well-being.

Contract Policy & Risk Profile

It is listed on Merlin's Contract Policy Risk Profile that:

"unethical conduct by Merlin's suppliers and their supply chain could cause guests to lose confidence in Merlin's brands and expose Merlin to significant reputational and financial harm. Unethical conduct could relate to bribery and corruption, money laundering, modern slavery, equal pay, discrimination, child labour, human rights, animal welfare and the environment, and as a business, we only wish to do business with suppliers who share Merlin's values."

Therefore, additional approvals are required if third parties do not comply with signing up to Merlin's Ethical Dealing Principles.

Employees and third parties are made fully aware that breach of any policy, or failure to raise concerns may either lead to disciplinary action up to and including dismissal or termination of contract (in relation to third parties including suppliers and vendors).

Our Supply Chain

As our supply chain is global in nature, we regularly work with local and national, as well as international, business partners. Merlin will not knowingly do business with any parties who do not comply with applicable laws and regulations, including local, environmental and employment laws.

Unless a higher or equivalent standard is applied, suppliers are required to agree, as a condition of doing business with Merlin, that Merlin's Ethical Dealing Principles will apply (see Contract Policy & Risk Profile). Any requests to move away from this principle of doing business must be escalated to senior management

Our Ethical Dealing Principles require suppliers to be compliant with international conventions in relation to forced labour; freedom of association; the right to organise and collective bargaining; equal remuneration; abolition of forced labour; discrimination; minimum age and child labour; the European Convention on Human Rights and European Money Laundering Convention. They also require suppliers to be compliant with applicable legislation in relation to bribery and modern slavery.

Third parties providing certain construction related goods and/or services to Merlin Magic Making are also required to participate in a due diligence and tender process and, if successful, agree to Merlin's standard framework agreement or another appropriate contract template before they are admitted to the Preferred Suppliers List. This is all in addition to agreeing to Merlin's Ethical Dealing Principles.

Supply Chain cont'd

Merlin has several systems in place to identify and assess potential risks in our supply chain, as well as mitigating touch risks and protect those who speak up. These include:

- Binding third parties to ethical dealing principles within our contractual terms and conditions;
- Holding regular review meetings with major commercial suppliers and brand partners which focus on the delivery of goods and services in line with the terms of our agreement;
- Invoking strict sanctions on suppliers who do not meet our performance expectations or uphold the terms of our agreement (for example, any evidence of child labour results in the immediate delisting of a supplier)
- use of an independent externally hosted Speak Up Hotline which all employees, workers and external consultants/contractors working on behalf of Merlin have access to and are encouraged to use whenever appropriate

Furthermore, Merlin continually reviews its policies and procedures based on lessons learnt from the above initiatives and other business developments to proactively maintain an informed approach to preventing modern slavery in our society.





Training

All employees who have been determined as at-risk of potentially encountering modern slavery as part of their role, for example those regularly involved in the procurement of goods and services, are provided with the Ethical Dealing Principles as a tool to use with their third parties. The Ethical Dealing Principles are being revised in 2026 and will be rolled out with supporting information.

Additional training is also being developed for 2026 which will focus on:

- Geographical risk
- Identification and mitigation of risks
- How to identify modern slavery
- How to report concerns through the Speak Up Line
- Being mindful of increased risks

Effectiveness Review 2025

Merlin understands that modern slavery risks continually evolve and will remain vigilant regarding issues in our supply chains.

We will always comply with local legislation and adopt global standards in the way we work with our people and third parties. In addition, we continue to monitor the performance of our measures to detect and prevent modern slavery in our supply chains through an annual risk assessment workshop and continuous monitoring our plans.

During 2025, the following was completed as part of the continuous improvement plan:

- Launched a new Retail Merchandising Code of Conduct for third parties
- Launched the new Anti-Corruption Policy which brought together all forms of corruption risk into one framework
- Held quarterly workshops with all internal stakeholders and connected entities to identify and monitor modern slavery risk
- Online resources identified and implemented to track modern slavery risk in our Conservation Welfare and Education workstream
- The People team implemented a global role architecture to ensure that robust pay review processes are in place

For 2026, the Modern Slavery compliance action plan includes:

- Deliver training on modern slavery risks to employees working in "at-risk functions"
- Renew the HRis (People) system to support additional reporting of data connected to modern slavery risks
- Hold an additional workshop with stakeholders to share best practice in relation to third party auditing of modern slavery risks
- In connection with the Retail Buying new leadership team, conduct a full review of their risk profile
- Include legislation updates including modern slavery risks in the ESG Council meetings and conduct a deep dive of MS risk in the Risk, Control & Compliance Forum
- Refresh the employee Code of Conduct and attestation process

Modern Slavery Statement

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and section 14 of the Australian Modern Slavery Act 2018. It constitutes our modern slavery statement for the financial year ending 31st December 2025. This is a Group statement which covers the subsidiaries that apply to the disclosure criteria of the UK Act, namely Merlin Attractions Operations Limited and Merlin Entertainments (SEA LIFE) Limited.

In respect of the Australian Act, it also covers Merlin Entertainments (Australia) Pty Ltd.

This report was approved by the Board of Directors of Merlin Entertainments Limited on 9th June 2026 in its capacity as the principal governing body of each reporting entity.

In accordance with Australian obligations, this report is signed by:



Craig Leversha – Director Merlin Entertainments (Australia) Pty Ltd

