

Modern Slavery Statement

Introduction

IAG is one of the world's largest airline groups with a fleet of 601 aircraft as of 31 December 2024.

IAG is the parent company of Aer Lingus, British Airways, IAG Cargo, IAG GBS, IAG Loyalty, Iberia, LEVEL and Vueling (the 'operating companies'). In this statement, any reference to 'IAG' or 'the Group' includes the operating companies and their relevant subsidiaries. Further information regarding the Group's structure and operations may be found via this [Link](#).

In 2024 IAG had 74,378 employees across 77 countries and operated to over 259 destinations in 91 countries. In 2024 we carried over 122 million passengers on our network.

In addition to our own extensive footprint, we have a large and complex supply chain, in our bases of operation, London, Barcelona, Madrid and Dublin, across the outstations to which our airline operators fly to and through our supply chains.

The scale, nature and footprint of our business and supply chain presents specific challenges and risks in relation to modern slavery and human trafficking. Our commitment to address the issue is demonstrated by the fact that it sits at the centre of our revised policies and codes of practice, along with our Human Rights Policy and Ethics and Compliance Framework, all launched in 2024.

Over the last few years IAG has played a key role as part of an international working group led by the International Civil Aviation Organization (ICAO) to produce updated guidelines for combatting trafficking in the aviation industry. These guidelines were published in April 2025 and demonstrate that through collaboration across the travel and tourism industry, government

agencies and NGOs we can be more effective at tackling these important issues.

This statement sets out a high-level summary of the activity within the Group to tackle modern slavery and human trafficking risks. Further information and detail of this work can be requested via compliance@iagroup.com

During 2025 and beyond we will continue to proactively assess and mitigate these risks in our business and supply chain and monitor and report our progress. All our colleagues are committed to this, and our training and awareness campaigns reinforce our efforts.

Given the evolving nature and patterns of modern slavery and human trafficking and the regulatory changes in this area we will continue to review and update our policies, processes and training to ensure they are effective and put into practice.



Luis Gallego

**Chief Executive Officer,
IAG**

28 June 2025



I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act and that I have the authority to bind IAG.

This report was approved by the Board of Directors of IAG, in May 2025 in compliance with section 11(4)(b)(ii) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, section 54 of the UK Modern Slavery Act 2015 and Commonwealth Modern Slavery Act 2018.

This statement is made in relation to International Consolidated Airlines Group S.A, Aer Lingus Limited, Avios Group (AGL) Limited, BA CityFlyer Limited, British Airways Plc, British Airways Holidays Limited, British Airways Maintenance Cardiff Limited, Compañía Operadora de Corto y Medio Radio Iberia Express S.A.U, IAG Cargo Limited, IAG GBS Limited, Iberia LAE S.A Operadora, Overseas Air Travel Limited and Vueling Airlines S.A

Policies and Procedures

IAG Code of Conduct

IAG's refreshed Group Code of Conduct outlines key principles to ensure that everyone working within the Group is aware and understands the behaviours that are expected of them and how to raise concerns. The importance of the Code and our collective responsibility to act with integrity and uphold its values has been reinforced through a communication campaign from our leadership team.

The Code requires that our activities respect the human rights of others including a commitment to tackle any form of forced or involuntary labour, human trafficking and modern slavery anywhere in our business.

Over 56,495 members of our staff have carried out mandatory training on the Code of Conduct.

IAG Third Party Code of Conduct

Our revised Third-Party Code of Conduct expressly deals with the issue of Modern Slavery and sets out specific expectations for our colleagues, suppliers and partners.

"We expect our Third Parties to honour IAG's support of human rights and never engage in, or allow any form of forced or involuntary labour, human trafficking or modern slavery anywhere in their own operations or in the operations of their own third parties. As a Group, we are committed to taking swift action in the event any evidence related to slavery or human trafficking is identified".

Modern slavery and human trafficking can be difficult to identify. Our focus extends to broader labour rights issues such as working conditions, health and safety, discrimination, wages, benefits and working hours as these issues are often prevalent in modern slavery type situations and easier to assess.

We also require that, from the outset, suppliers observe ethical hiring practices that include verification of a worker's age, the legal right to work in the appropriate country and all applicable laws and regulations.

Our sustainability and compliance teams across the business ensure that we have effective reporting and escalation of issues as they arise. To support their work the Third-Party Code of Conduct allows IAG to seek evidence of

compliance from suppliers. It also recognises the challenges that many suppliers may face in monitoring their own supply chains and that they may be reluctant to admit that they have an issue. To address this, we encourage a collaborative and transparent approach and specifically ask suppliers to come forward with questions or concerns if they are unsure about the right thing to do.

We aim to work in partnership with suppliers to solve and remediate any issues in a way that is sensitive to those directly or indirectly affected and in a manner that drives and encourages a transparent and open culture of reporting.

In more serious cases of non-compliance, the Third-Party Code of Conduct provides for engagement with regulators and law enforcement, the termination of business relationship and/or litigation.

Our policies recognise that all our colleagues have a role to play in maintaining an ethical culture and a responsibility to understand and apply the requirements within them. They encourage employees to share their concerns so they can be investigated, to set the tone through their own words and actions and to respond effectively and promptly to any concerns that are raised.

Our policies make it very clear that where colleagues are themselves responsible for improper behaviour relating to these standards this can result in disciplinary action up to and including dismissal.

IAG Ethics & Compliance Framework



As a Group, we are committed to

Dignity and respect. *We work closely with governments and the airports in which they operate to ensure that any suspected trafficking on our flights is identified, reported and dealt with appropriately. We support the 2018 International Air Transport Association (IATA) resolution denouncing human trafficking and reaffirming our commitment to tackling this issue.*

Looking beyond. *We communicate our expectations to suppliers and business partners at the outset of our business relationship with them. We are committed to taking swift action in the event any evidence relating to slavery or human trafficking is identified.*

Social safeguards. *We speak up if we see or suspect any form of human rights abuse.*

This is underpinned by a new Human Rights Policy which specifically addresses modern slavery and human trafficking, forced or child labour, freedom of association and labour standards more generally. The Policy sets specific standards for suppliers and partners and an expectation that Human Rights will be respected.

Human Rights Policy & Ethics and Compliance Charter.

During 2024, the IAG Board approved a new Human Rights Policy and a new Ethics and Compliance Charter to bring our policies to life with a clear framework and process for managing ethics and compliance risks at Group level and within each operating company.

The framework is underpinned by a three-year plan, to promote and foster an organisational culture of integrity and ethical decision-making and the implementation of procedures, controls and processes based on a risk-based approach including specific initiatives related to Human Rights, Modern Slavery and Human Trafficking.

Our Human Rights Policy confirms our commitment to respect, protect and promote internationally recognised human rights as set out

in the UN Guiding Principles on Business and Human Rights.

ICAO and IATA standards

IAG has been a key partner in developing the joint Guidelines for Combatting Trafficking in Persons in the Air Operator Supply Chain ICAO-OHCHR Circular 362 in partnership with other airlines, regulatory bodies, law enforcement agencies, NGOs and national government agencies. These guidelines were published in April 2025 and work is underway to ensure that our internal policies and procedures are aligned with these new guidelines.

We also follow the existing ICAO guidance under Circular 357 (Guidelines for Reporting Trafficking in Persons by Flight and Cabin Crew) and Circular 352 (Guidelines on Identifying and Responding to Trafficking in Persons).

Our approach reaffirms our commitment to support governments and law enforcement to prevent human trafficking through raising awareness, staff training and effective reporting methods.

Policy oversight

As part of our wider oversight the operating companies and IAG's Management Committee receive updates on compliance issues.

The Ethics & Compliance Committee and the Audit Committee of the IAG Board are briefed on any significant issues and changes to policies and procedures.

IAG recognises that a failure to address human rights violations, including modern slavery and human trafficking within its own business and supply chains, could lead to significant legal, social and reputational consequences and may have profound and far-reaching effects on individuals, families, communities and society more generally. Our work in this area is captured as a material issue in the "Impact, Risk, and Opportunity" analysis for our Sustainability Statement ensuring that the issue has had full priority, scrutiny and analysis in our 2024 reporting and audit processes.

Supply Chain Risks

Introduction

IAG has over 17,500 suppliers, and goods and services sourced by the Group come from all parts of the world.

IAG is committed to procuring goods and services from suppliers who demonstrate ethical principles in the way they conduct their business. We expect our suppliers to provide a fair, safe and healthy environment for their workforce.

Our top 100 suppliers account for the vast majority of our spend and many of our first-tier suppliers are based in our key markets in Europe, UK and Ireland and North America.

The risk of modern slavery and human trafficking is prevalent across the world. To maximise impact, IAG has adopted a targeted approach to identify, assess and address these risks. This approach adapts to the changing landscape and patterns of criminal behaviour, global events, different geographies, routes and industries from time to time.

The approach also needs to be tailored to address supply chain risks that sit behind our first-tier suppliers for which there is less transparency.

Goods and services from certain regulated and professional activities e.g., the supply of fuel, regulatory & airport fees, and engineering & maintenance services, represent the majority of our annual spend, excluding the cost of acquiring and leasing aircraft. While the risks of modern slavery and human trafficking can still exist in regulated businesses, they may be different from other sectors where some of the risk factors are more prevalent.

IAG is working to ensure that:

- *all suppliers are aware of our policies and standards and commit to adhere to them.*
- *there is full and regular mapping of our supply chain, not just where the majority of spend is located.*
- *there is an effective and dynamic way of identifying high risk suppliers, looking at the industry in question and the location where the work it is carried out and using information and intelligence from reliable international sources.*

- *there is a focus on unregulated and manual activities, where the risk relating to temporary and casual labour may be more prevalent.*
- *the risk assessment extends to industries that have complex and lengthy supply chains, so that these areas can be given further scrutiny and analysis.*
- *a collaborative approach is taken with all internal and external stakeholders to identify and mitigate risks, using our leverage as a customer for services and goods.*
- *it has an effective system for complaints and issues to be raised and discovered for investigation, for remediation and for tracking and recording trends across our supply chain.*
- *we work collaboratively with industry groups such as ICAO and IATA, national enforcement agencies and other partners.*
- *we have a skilled and effective team focussed on this important work.*

IAG also proactively identifies supply categories where there are increased risks. The criteria for assessing these risks include specific industry types; vulnerable populations & high-risk employment practices; socio-economic issues, country profiles and geopolitical factors in addition to high spend/volume and strategic partners. Information to assess these issues is taken from various external sources including the following:

International Labour Organisation ("ILO")

International Trade Union Confederation's (ITUC) Global Rights Index

Global Slavery Index (Walk Free)

UN Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, 2022

List of Goods Produced by Child Labor or Forced Labor (US Department of Labor - Bureau of International Labor Affairs)

IAG GBS provides a centralised procurement function for the Group and has a dedicated Supply Chain Sustainability Programme which consists of four key aspects relating to the suppliers:



This centralised function allows IAG GBS to set strategy and expectations, increase awareness, provide analytical information and report and manage supply chain risks for all the operating companies. These teams are given specific training on identifying and tackling modern slavery and human trafficking risk factors.

The risks of modern slavery and human trafficking within the supply chain are monitored at various stages of the procurement process and during the life of contracts.

British Airways Holidays Limited also runs its own Responsible Sourcing Programme, aligned with IAG GBS strategy to address the unique needs of their business model and supply chain, which include suppliers of travel and tourism products.

IAG engages with suppliers in high-risk areas to assess how they manage risks in their own business and supply chains. This allows us to better understand the extent of their own operation and that of their supply chain, their policies and procedures and approach to risk assessments and remediation. It also allows for further analysis of any specific issues/complaints that have arisen and how they are being addressed. Where necessary a follow up engagement plan is also agreed to address labour issues and standards.

Any issues are flagged to key stakeholders within IAG to take appropriate action. This will also include direct engagement with the supplier and, if necessary, further enquiry/assessment.

Contractual terms

IAG's policies in relation to modern slavery & human trafficking are flagged to potential suppliers within the procurement process via our Third Party Code of Conduct.

There is specific reference in the policies to the prohibition on the use of any form of forced, involuntary or child labour, human trafficking, and modern slavery alongside broader requirements about respecting the human rights and working conditions for employees. Suppliers have a contractual obligation to meet these standards.

We reserve the right to terminate supplier contracts where a supplier engages in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the UK Modern Slavery Act. However, in the first instance we would work with our suppliers and those impacted by their actions to identify and remedy the situation.

Supplier screening

IAG works closely with EcoVadis in mapping out global risks and providing alerts in relation to developments within most of our supply chain.

EcoVadis assesses supplier information and provides a score based on various issues including the following:

- labour and human rights
- working conditions and social
- risks based on the country of operation, the industry type and the size of the company

Where EcoVadis scorecards illustrate under performance, corrective action plans are used to drive improvements.

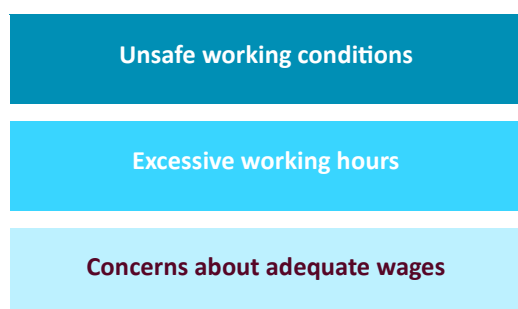


In 2024, the number of supplier scorecards was increased to 597. In total, these scorecards cover 79% of our supplier footprint by spend and include over one hundred of our key suppliers.

IAG has also partnered with SEDEX in 2024 to assess and map out audit activity in relation to specific suppliers and to plan mitigation and remediation actions.

In 2024, we obtained SMETA (Sedex Members' Ethical Trade Audit) and non-SMETA audit reports and ISO certification data from 170 suppliers. We received and analysed 109 audit reports comprising 56 audits from 2024 and 53 valid audits from 2023.

From this analysis the three most common labour issues identified were:



These broader indicators of social non-compliance including freedom of association, gender inequality, health and safety and hygiene and wage issues are more likely to be prevalent where the risk of modern slavery/forced labour exists and where further enquiry and investigation is required.

In a small number of cases (including tier 2 audits) concerns of forced labour within supply chains were raised.

In total the suppliers in scope of these audits came from over 22 countries from all continents with over 467 issues recorded in total.

This analysis is escalated to a Sustainability Board (consisting of stakeholders from the sustainability, procurement, compliance and the legal teams) to prioritise and track follow up actions. This includes additional assessments, ongoing risk management and improvement plans.

Additional EcoVadis and SEDEX insights are requested for suppliers who are the subject of specific complaints (via our EthicsPoint whistleblowing reporting tool or otherwise), adverse press reports or public information from organisations such as the Business and Human Rights Resource Centre.

We are continuing with regular meetings for key suppliers in high risks industries to map supply chains, to identify areas of risk and to understand the steps they are taking to tackle modern slavery and human trafficking in their operations and supply chains, alongside more detailed analysis of any audits carried out via SEDEX or otherwise.

Hotels

IAG relies on a global and extensive hotel and accommodation stock and this sector is assessed as high risk from a modern slavery and human trafficking perspective.



Our operational staff (cabin crew, pilots, managers and engineers) use hotels for duty travel at various destinations.



Our customers rely on accommodation as holiday makers and when they are affected by disrupted flights.

In 2024, 74% of IAG's hotel procurement for crew was for destinations in Europe and North America. Our in-group leisure hotel customer stays were mainly in Europe (45%), the Caribbean (19%), North America (15%), Indian Ocean (7%), and the Middle East (5%) complemented by smaller number of stays across other global regions.

Hotels are procured in different ways – via global contracts with international and regional hotel groups, individual hotel arrangements and through wholesale partners to provide additional stock. The different business models are often separate from ownership models which combined with the geographical scale and diversity of this sector can add complexity to managing risk and oversight. The scale and volume of our procurement in this sector presents an opportunity to tackle risks in this sector.

According to the World Sustainable Hospitality Alliance ("WSHA") and the International Organisation of Migration, UN Migration ("IoM"):

10%

of all modern slavery in the world is in the tourism sector of which hotels and accommodation is a significant part.

Our own assessment identifies specific risk factors relating to labour intensive activities and complex supply chains including food & beverage, laundry and cleaning, maintenance, security, excursions, and transportation. Some of these services rely on low paid and casual labour including temporary, seasonal and migrant workers and agency staff for their workforce and to meet short term spikes in demand. This can involve expedited and less rigorous recruitment processes with associated risks of modern slavery.



In addition, many workers in this sector are in less visible roles and easier to conceal from the public and the authorities. In some regions, the sector will also come with the risk of child labour and across the globe hotels and accommodation are used to facilitate human trafficking including child trafficking.

All our colleagues have a responsibility to tackle modern slavery and human trafficking within our supply chain and our operational staff who stay at these hotels are encouraged and supported to raise any concerns that they have.

BA Holidays has carried out an assessment on its supply chain using a risk-based approach informed by the International Labour Organisation (ILO) indicators of modern slavery and other global indices including the Round Table for Human Rights in Tourism's Destination Risk Map and SEDEX-Radar high-risk country list.

The assessment informed their human rights policy implementation programme and Responsible Sourcing Programme's supplier self-assessment criteria.

In addition, an industry assessment on the salient human rights issues was led by the BA Holidays' Sustainability Team in collaboration with Shift – an expert human rights capacity building partner.

Six salient human rights issues were identified for further attention with forced labour, modern slavery, and human trafficking all featuring as key risks in the value chain. The six salient issues form key commitment areas in BA Holidays' new Human Rights policy.

In 2024, BA Holidays conducted a review of the top five Hotel Partners including of their public policies, procedures, and disclosures to gain insight into their management of risk and controls. This review covered 3,127 properties. The findings identified gaps in compliance controls which led to BA Holidays initiating a programme to address the risk of modern slavery and human rights due diligence in hotels.

Over a third of BA Holidays' hotel offering are members of the Sustainable Hospitality Alliance (WSHA), or franchise partners of members, through which members commit to raising awareness of human rights risks, embed human rights into corporate governance, and address risks arising in the labour supply chain and during construction.

For the supply chain of non-member hotel partners and suppliers, the approach to risk management and engagement will be consistent with these standards.

We are working closely with our key partners and other industry bodies recognising that further improvements that can be made in relation to management of hotel compliance processes to increase awareness and the number of reports from suppliers on this issue.

In 2024 we continued to investigate an alleged forced labour issue at a partner's franchise property in the Gulf region. Their human rights team was engaged and formal requests were made for information covering all high-volume properties in the region.

Summary of the overall risk in each destination:



BA Holidays Human Rights Impact Assessment - top 20 destinations that were assessed based on destination risks.

Catering

IAG carried over 122 million customers in 2024 and provided meals in the air and on the ground in our lounges. These meals are prepared at our main bases of operation in Barcelona, Dublin, London and Madrid but also at various outstations on our global network.

Given the complexity of the catering supply chain and food sourcing we have identified this as a sector that presents challenges and risks in relation to modern slavery and human trafficking, and which requires scrutiny.

Many of the food items required for the catering sector feature high on the list of products potentially affected by the risk of child and modern slavery, such as coffee, soya and chocolate. Many of the working practices associated with these products such as growing, farming, harvesting, processing and transport involve low skilled, casual and low paid workers, along with migrant labour. The risks of modern slavery are prevalent in these situations even within European countries where migrant labour is relied on.

Most of the catering for our operating companies is carried out by a small number of suppliers, with our top 5 suppliers representing 66% of our group spend in this category. More than 50% of our spend is in Europe.

We are working with our main suppliers to ensure that risks within their own operations and supply chains are mapped and addressed and that those involved in the production and supply of catering products understand and follow our policies and standards.

Through this engagement several of our suppliers identified significant challenges in mapping the full extent of their own supply chain given their reliance on distributors of prepared foodstuffs rather than suppliers of the raw food product itself. This was made more complex given the dependence on several suppliers for the same products, that much of their sourcing of foodstuffs was ad hoc and accelerated to address time critical gaps in supply chain and the overall lack of visibility of the supply chain below the distributor of prepared foodstuffs.

This may improve with the obligations under the EU Deforestation Regulation (EUDR), which some of the suppliers are now actively implementing



although this is limited to certain products. We are encouraging our suppliers to adopt similar principles to tracing and tracking the source of the products they use. One such example is that our main supplier is now sourcing all its cocoa via the Cocoa Horizons Project to better address challenges such as child labour, deforestation, and gender imbalance in cocoa-growing regions.

One of our key suppliers operating on our African and American routes sources much of their foodstuff locally and have focussed their efforts on reinforcing principles of ethical sourcing and responsible procurement for their regional teams and local staff. This has been accompanied by clear and specific mechanisms to facilitate open reporting about supply chain risks, alongside a just culture in the workplace to empower their teams to report concerns proactively.

Onboard products

In 2024 we carried over 122 million passengers on our network.

For many of our flights we have sourced onboard products including pillows, blankets, tableware, audio headsets and earplugs for our customers to use.

Due to the location of the manufacturing process (Asia) and the sourcing of raw materials for these products (Asia and Africa) we have assessed this supply chain as one where the risk of modern slavery and human trafficking may exist.

In addition, the nature and relatively low cost of the products, produced at scale and in factory environments with large and low skilled workforces presents risks in relation to labour standards.

We have reviewed three of our key suppliers in this area representing all onboard products for three of our operating airlines. These suppliers have shared their programmes to address modern slavery risks including social audits, details of their supply chain, policies and whistleblowing channels.

The SMETA audit information received included an analysis of 17 manufacturing facilities in Asia. In

total the audits identified 112 labour issues globally including low social insurance engagement, excessive monthly overtime and inadequate personal protective equipment. As these are potential indicators of modern slavery we have followed up with further enquiries and escalated these reports to our internal Sustainability Board. We are in regular contact with these key suppliers regarding the remedial action they are taking to resolve the non-compliance identified.



Uniforms

With almost 56,000 operational colleagues, IAG sources tens of thousands of new and replacement uniform items each year.

The garment industry is one of the largest employment sectors worldwide. There are risks of modern slavery at every stage of the supply chain, from the production of raw materials, cotton harvesting and garment manufacturing.

The key suppliers in our uniform supply are European based commercial organisations with outsourced arrangements to third parties around the globe with limited visibility and transparency of the full supply chain for the end use customer.

The items and the raw materials to produce goods for our uniform supply chain are sourced from Spain, United Kingdom, Bangladesh, China, India, Morocco, Indonesia, Sri Lanka, Vietnam and Pakistan. Garment manufacture in many of these

areas is associated with less stringent labour regulations, informal labour arrangements and intensive factory-based operations.

Our suppliers in these areas have made contractual commitments in relation to anti-slavery practices and to source items ethically and in a sustainable way.

Our uniform suppliers have an average Ecovadis score of 70% in Labour & Human Rights compliance, but our focus remains on how they map and manage their supply chain.

In 2024, 15 audits were received in this sector. From these, 67 issues were found in their supply chain in relation to working conditions, excessive hours, wages and irregular employment. We are in regular contact with the suppliers regarding the remedial action being taken to resolve the non-compliance.

Ground Handling

The aviation industry is one of the primary modes of transportation utilized by traffickers, making it very likely for airline personnel to come face to face with victims or perpetrators. The frontline for this is the airport environment and the check in process, where unique and early opportunities exist to identify and react to human trafficking.

Across IAG our ground handling activities are handled by our own staff at our key airports. We have 33,000 people in our group dedicated to check in across the UK, Spain, the USA, Central and South America, Japan and India. Together this represents 67% of our group handling by aircraft movements.

We work closely with partners at less busier airports, with our four main partners handling group airlines at 98 airports primarily across Europe and North America representing 72% of our group handling by aircraft movements.

An important part of the role of check-in agent is to check the documentation of passengers and through this process non-compliances are often identified.

In 2024 we monitored the trend of non-compliances across our network for each of our airlines to identify where document irregularities were more prevalent, which then informed a more targeted approach to ensure that our staff at these airports and on flights from these destinations are receiving the relevant information, training and support to spot and report potential human trafficking.

We continue to monitor changes in trends across our network on a quarterly basis to ensure that our approach can adapt to any changes in trafficking routes.

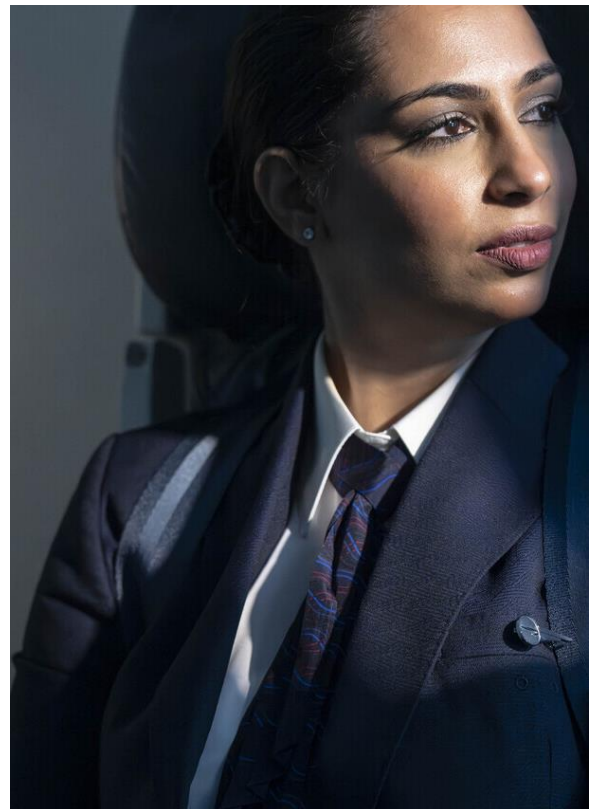
In 2024 we also engaged our four main external suppliers on the specific issue of human trafficking. Through this we sought a better understanding of their own approach to human trafficking, their policies and training of their staff and how they record and report incidents. We shared our own practices with these suppliers and provided access to our online training to support their own work on this issue. The aim is that engagement will continue proactively and highlight the importance of this issue to our suppliers.



As the check-in process involves manual checks there is the risk of insider activity where a staff member is incentivised or put under pressure to facilitate immigration breaches which could extend to trafficking. Our

operating companies and the airport authorities have very clear requirements about the recruitment and vetting of ground handlers to ensure that these staff are trustworthy and are eligible to work.

In 2024 we were notified of 26 reports of suspected human trafficking, all from cabin crew. This is an increase on the number reported last year but most likely does not fully represent the number of reports being made by our staff.



A standardised processes for reporting and recording reports of suspected cases would lead to more accurate information, increased reporting and inform a targeted approach to the issue. To address this, we aim to create guidance for our third party and inhouse ground handling suppliers and for cabin crew so that suspected modern slavery and human trafficking issues can be handled more consistently. This guidance will incorporate principles of:

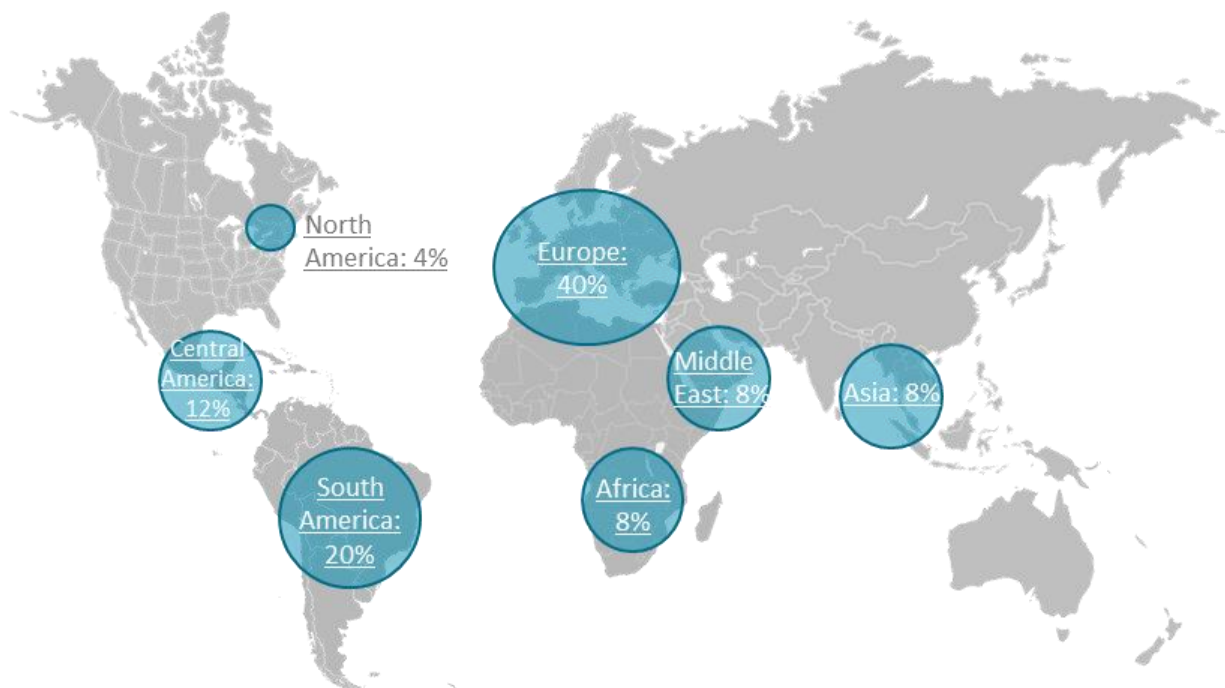
- ✓ Best practice
- ✓ Information sharing
- ✓ Standardised reporting and collaboration

We recognise the challenge and perceived risk of making a report of suspected human trafficking, particularly in a live operational environment and with short and busy flight sectors. We adhere fully to the joint ICAO-OHCHR Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons (Circular 352).

An important aspect of the work of our inhouse and external ground handling teams is their collaboration with the authorities in airports, including immigration, customs, security and police officers, contractors and cleaning staff and the airport authority itself. In some cases, this also extends to the local authorities and social services situated around the airport where a potential victim of trafficking is identified.

We are working to strengthen these networks and collaborate further to ensure that our approach to modern slavery is coordinated.

HIGH RISK ROUTES:



Training & Awareness

Detailed materials relating to human trafficking and modern slavery are available to employees on our intranet pages.

In 2024 we launched a modern slavery and human trafficking campaign across the business to highlight the relevance of the issue to aviation and to provide practical guidance and support to operational staff. This information was shared on display boards and posters, within employee communications and intranet sites, all supported by a roadshow in operational areas.



In April 2024 British Airways started its partnership with Tribe, a charity that raises awareness of modern slavery and human trafficking issues with colleagues, whilst involving them in their work to support victims. Through this collaboration our staff have been encouraged to support fund raising for the charity, via BA's community channel accessible to staff and passengers.

Iberia has partnered with A21 and Betania to raise awareness and support its training programme.



To support the awareness campaign, a specific e-learning module was created for our cabin crew, pilots and airport colleagues providing examples and guidance on how to identify and report issues in line with the relevant ICAO/ONHCR guidance and linking to IATA's "#EyesOpen Against Human Trafficking" campaign.



The e-learning module is an accessible and efficient alternative to classroom-based training and is accessible from mobile phones and electronic devices. IAG has provided access to this tool to key suppliers in the hotel and ground handling sector so that it could be used more widely.

15,492
employees
completed
specific
training

10,137
accessing the
e-learning
module

All training programmes are implemented at operating company level, and each is responsible for determining the specific courses that are mandatory within their organisation, the frequency with which training courses must be completed and the employees required to attend these courses. Through ongoing collaboration between our operating companies, we share best practice and pool resources.

Our specific modern slavery training sits alongside a core mandatory training course on the Code of Conduct and more general compliance, security and operational training delivered on recruitment and on a recurrent basis.

More specific training is offered regarding supply chain management for our procurement function on how to address modern slavery and human trafficking issues through selection, drafting and the life of supplier contracts.



"The ease of reporting such situation was a major factor, and not being uncomfortable with reporting something, but knowing we did the right thing of highlighting a potential issue."

BA Crew member. Reported child trafficking issues in April 2024 after completing the training module.

"NO CHILD SHOULD EVER GO THROUGH WHAT I DID."
Olympian and child trafficking survivor
Mo Farah

FIND OUT HOW YOU CAN HELP FIGHT HUMAN TRAFFICKING ON OUR BA

Our Workforce

The number of people employed across the Group as of 31 December 2024 was 74,378, based in 77 different countries. The majority of this population is based in the UK, Ireland, Spain, with significant groups of employees in the USA, Canada and India.

We are committed to ensuring high labour standards for all the employees within our Group companies and to provide a safe and positive working environment in which all employees can realise their full potential.

Most of our staff are recruited through our own internal teams. Given our industry the recruitment processes we follow require pre-employment referencing process for all new colleagues, whether they are contractors sourced via an agency or permanent colleagues. Through this process we require details of employment history.



For certain roles we require a Basic Disclosure Certificate, known as a Criminal Record Check. We also ensure that all applicants have the right to work and possess the relevant documentation.

Our work with recruitment agencies is governed by our procurement process and our internal policies. These checks reduce the risk of irregular or illegal employment.

IAG and its operating companies have robust policies that address issues such as the elimination of discrimination, health & safety, working time and reward. These policies comply with the conventions of the International Labour Organization (ILO), covering subjects that are considered as fundamental principles and rights at work including the freedom of association and the effective recognition of the right to collective bargaining.

Collective bargaining arrangements
are in place for 85% of the
workforce across IAG

Our operating companies consult on a regular basis with employee representative bodies, including trade unions and works councils.

IAG also has a European Works Council which brings together representatives from the different European Economic Area (EEA) countries in which the Group has operations.

In the ILO Report for the Technical Meeting on a Green, Sustainable and Inclusive Economic Recovery for the Civil Aviation Sector (Geneva, 24–28 April 2023) IAG was recognised for best practice on engagement and collective bargaining. Many of the agreements reached in that period remain in force or have been further updated via collective bargaining.

IAG has provided an update and discussion on IAG's approach to modern slavery and human trafficking and sustainability reporting with the European Works Council in 2024.

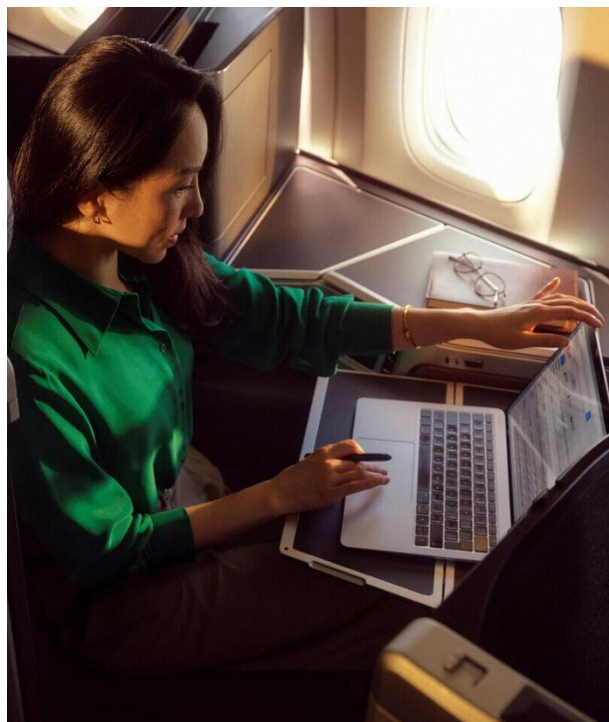
Facilities are available across the Group for employees to report grievances or any alleged or actual wrongdoing. A whistleblowing channel provided by NAVEX is available for concerns to be raised on a confidential basis. This external and independent service is available to all our employees and to others working in our supply chain. We also created a standard process in 2024 so that labour related complaints (internal and external) can be tracked and addressed more effectively.

The IAG Audit and Compliance Committee receives a report on complaints to our whistleblowing channels on an annual basis.

Each company in IAG has its own communication channels adapted to its culture and profile. Communication with employees is through both formal and informal channels, which include performance reviews, specific consultations, employee forums, internal social networks, local cascade meetings, newsletters, workshops, engagement surveys and confidential and independent Speak Up channels. In 2024 this has included specific information on modern slavery and human trafficking, including practical guidance on how to spot issues and report concerns.

IAG, its operating companies and subsidiaries ensure that our colleagues are aware of and understand our focus and commitment to tackle modern slavery and human trafficking and that

they are fully engaged and involved in our collective efforts to do so.



Further Action

In 2025 we aim to:

- Continue to develop our approach for tackling Modern Slavery at all levels within our supply chains across the Group, particularly in high-risk areas/industries.
- Creating internal working groups for each of the relevant industries identified to target risk management and assessment activity.
- Developing a questionnaire for key suppliers at onboarding stage with specific industry enquiries.
- Continue with the roll out and updated targeted Modern Slavery awareness materials for all Procurement staff and other employees who work with suppliers and to build capacity and support the culture of respecting human rights.
- Updates at Board and Management Committee levels on Modern Slavery/Human Trafficking.
- Validate salient issues with stakeholders and emphasise accountability in eradicating Modern Slavery and Human Trafficking from our business and our supply chains.
- Continue the awareness campaign and updating of crew/staff manuals on procedures for identifying potential cases of human trafficking on our flights and centralise the reporting and tracking of issues.
- Continue to work with other companies/industry bodies to share knowledge, learning and best practice.

