Modern Slavery Statement

Introduction

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as forced labour, domestic servitude, sexual exploitation, criminal exploitation, forced marriage and child labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As a business, Liverpool Airport Ltd, comprising Liverpool John Lennon Airport (LJLA), Air Traffic Control Services Limited (ATCSL) and Liverpool Airport Services Limited (LASL) are committed to being open and transparent in all our business activities. We are therefore committed to playing our part to minimise modern slavery in all parts of our business and being alert to the potential for slavery within supplier or contractor activity. To support this, we have since 2019 had an ongoing collaboration with the social enterprise Slave-Free Alliance, which has helped us to undertake an independent review of our policies and activities to identify potential areas of risk, opportunities and best practices.

This statement relates to activities taken to address modern slavery in the financial year ending 31st March 2026. This statement is published according to Section 54 of the UK Modern Slavery Act 2015 and is approved by the Liverpool John Lennon Airport Executive Management Team (EMT).

Structure, Business and Supply Chain

Opened in 1933, LJLA is one of the UK's longest established airports. It is comprised of three separate trading companies: Liverpool John Lennon Airport, plus two subsidiaries, Air Traffic Control Services Limited and Liverpool Airport Services Limited, referred to jointly herein as 'the Company'. Ownership is shared jointly by two separate entities: Ancala Partners (infrastructure investment manager) and Liverpool City Council. The Company's operations are based in the United Kingdom.

Services managed directly by the Company include fire, engineering, air traffic control, airfield operations, cleaning, car parks and all other activities such as marketing and accounts, totalling approximately 250 colleagues. Additionally, there are approximately 3,000 colleagues working on site through a variety of other businesses / suppliers including:

- Baggage and passenger handling
- Security services
- Airlines
- Passenger mobility services
- Waste management
- Retail and catering concessions
- Construction
- Supply/Fuel Farm

We had 5.6 million passengers flying to 70 destinations in FY26 and our top routes were Dublin, Belfast, Alicante, Malaga and Tenerife.

Governance

Sponsorship of the modern slavery programme sits with the CEO who is actively engaged with the process and reports progress to the Board of Directors. It is further devolved to the HR and Community Director to lead and coordinate with the Directors of Finance, Operations, Commercial and Aviation Services who

make up the Executive Management Team (EMT) and who are further supported by relevant senior managers. Associated KPIs will enable us to monitor progress, celebrate successes and identify areas of challenge as we continue to progress our modern slavery agenda.

We want to improve our human rights and modern slavery agenda and recognise the significant resource required to achieve our aim. We are committed to enacting real change and addressing our biggest areas of risk such as the potential for modern slavery in our supply chain and service partners. We have oversight of our direct workforce but lack information about recruitment processes or labour conditions in parts of our tier 1 and tier 2 supply chain.

Over the last couple of years modern slavery has been a top priority in our ESG agenda in line with the UN Sustainable Development Goals and our forth ESG report which will be published in October 2026 (for FY26) which outlines our specific targets and progress in this area.

We have gathered information to feed into this years' statement from the following teams:

- Directorates
- HR
- ID Centre and Head of Security & Terminal Operations
- Assets / Development

Policy

As part of our strategy to address the risk of modern slavery within the business and its supply chain, a number of supporting polices are in place including:

- Modern Slavery Policy
- People Strategy
- Whistleblowing Policy
- Training and Development Policy
- Dignity at Work Policy
- ID Centre Policy

All of the above policies are regularly reviewed with the help of our employment lawyers to ensure they contain robust information and relevant guidance. The ID Centre completes background checks for all airport users and is approved and audited by the Civil Aviation Authority.

Due Diligence

The Company provides transportation services to customers and many primary areas of our supply chain and hospitality provide those day-to-day operations such as security, passenger handling, customer services, retail etc. Additionally, key suppliers include areas such as construction and waste management. We provide clear guidance to our workforce and suppliers (both direct and subcontracted) in respect of our expectations and standards.

We also provide an accessible and independent mechanism to report concerns, including modern slavery for all Airport staff including suppliers and service partners, this mechanism is a Whistleblowing Hotline operated by SafeCall which enables colleagues to confidentially and anonymously (if they wish) report concerns to an external organisation who handles cases on behalf of the Company. The Airport has worked with SafeCall for a number of years and we continue to promote our whistleblowing hotline across the Airport site with regular communication

on our noticeboards, posters and colleague engagement survey. No modern slavery incidents were reported via our Whistleblowing Hotline in FY26.

The preference of the Company, excluding service partners, is to employ directly recruited colleagues as this offers more control over recruitment processes. As part of this recruitment process, applicants undertake face-to-face interviews as well as ID verification, references and a criminal record check in order to obtain an airport ID. All recruits are inducted on their first day of employment by HR and several other managers across the business, this covers health and safety, access to facilities, all company policies etc. In 2023 we introduced a compulsory e-learning module as part of our induction on how to spot, prevent and report modern slavery, which all new starters must complete within their first month of employment.

Areas of risk in the business and supply chain

We understand that sectors with high degree of subcontracting such as construction sites may increase the risk of modern slavery. This risk extends to other areas such as provision of security, personal mobility and car parking. Additionally, limited visibility of our supply chain can further heighten this risk. It is our aim to develop a progressive programme to further map such supply chains and evaluate that risk through both EMT and relevant senior managers, where members all have close relationships with these businesses. Overall responsibility for identifying risk lies with our Airport Operations Director.

The Company does not have visibility of the contractual arrangements or recruitment processes used by all parties present at the airport. However, this last year we have developed a Supplier Code of Conduct (COC) which details our expectations, minimum standards and behaviours which must be met by any entity that supplies products or services to LJLA. The Supplier COC covers areas such as human rights, employment practices, integrity and business ethics, environment, health and safety, IT and information security, governance and accuracy of records, branding, payment practices, and remediation. At the point of publishing this statement, we have had 12 organisations sign the Supplier COC and we will continue to progressively introduce this.

During the recent development of a solar farm, we sought to strengthen how our modern slavery expectations were communicated to the external companies involved and requested copies of their modern slavery statements. The Company recognises that airports can be used as gateways for human trafficking and the importance of raising awareness, promoting reporting and safeguarding potential victims. We work with law enforcement, regulatory and operational partners through the Risk Advisory Group, chaired by the Airport Security Manager. The Group includes representatives from Border Force, Merseyside Police, the National Crime Agency, airlines and relevant airport service partners. Human trafficking is considered within the broader human smuggling risk category, which is reviewed annually and reassessed if the threat level changes or an incident occurs. The Airport also participates in an Insider Threat Working Group chaired by Merseyside Police, through which relevant concerns can be shared and escalated. In addition, we work with Merseyside Police through Project Servator, which supports the deterrence and detection of criminal activity, including modern slavery and human trafficking.

We are also aware of people's increased vulnerability when it comes to the cost of living, the energy crisis, ongoing conflicts and recent changes in legislation. This increases the number of people in vulnerable situations which can lead to them being placed in potentially exploitative situations. Financial pressures can also limit options for already vulnerable individuals, and it is our intent to endeavour to make our colleagues and service partners aware of this risk by providing modern slavery awareness training. Furthermore, colleagues can receive financial advice through our employee assistance programmes with Health Assured and Medicash.

Actions to reduce modern slavery

LJLA is not complacent to modern slavery risk.

Progress made this last year includes:

- The introduction of our Supplier COC which communicates our stand on human rights, slavery, human trafficking and child labour.
- Additional training for senior managers on how to spot modern slavery in our supply chain was introduced with a current completion rate of 81%.
- Our Modern Slavery Policy is renewed annually to ensure its effectiveness and relevance.
- We have continued to regularly push awareness and educate 100% of our colleagues on Modern Slavery, including promoting our whistleblowing hotline with SafeCall.
- Continued our collaboration with Slave-Free Alliance, including shortly undertaking a focused gap analysis to inform the further development of our approach.
- We included questions about whistleblowing in our Employee Engagement Survey to encourage reporting and feedback.
- We included commitments to reduce modern slavery as part of our ESG agenda in line with the UN Sustainable Development Goals.

We will continue to develop our capacity to;

- Evaluate risks through mapping our supply chain to identify potential vulnerabilities and implementing strategies to mitigate these risks.
- Implement an improved tender process for suppliers to include modern slavery considerations and requires board approval.
- Establish a clear escalation policy to effectively respond to reported incidents of modern slavery.
- Drive continuous improvement via relevant senior managers who have undertaken awareness training by the Slave-Free Alliance.
- Develop a proportionate modern slavery action plan informed by the forthcoming gap analysis.
- Robustly check and improve our recruitment process to prevent and mitigate any risks.
- Continue to include Modern Slavery on the Executive Management Team's meeting agenda.
- Strengthen efforts to identify potential victims of trafficking.

Training

We continue to review our training in respect of modern slavery as appropriate for roles at all levels of the organisation. This is developed and delivered through our online training platform LearningNest. The following training has taken place or will take place this year:

- All colleagues were assigned a modern slavery e-learning module in 2025 with a completion rate of 99%.
- In 2026, colleagues completed more training with a current completion rate of 89% and selected senior managers were also required to complete a module on how to spot modern slavery in our supply chain with completion currently being at 81%.
- All new starters are assigned a compulsory e-learning module on how to spot, prevent and report modern slavery. This must be completed within the first month of employment.
- A future area of focus will be for EMT and relevant senior managers to undertake further training by the Slave-Free Alliance.

We recognise that further work is needed to strengthen our understanding and management of modern slavery risks. We remain committed to transparency, continuous improvement and developing our approach to identifying, preventing, mitigating and responding to risks across our operations and supply chains.

This statement was approved by the Board of Directors of Liverpool Airport Limited on 29 October 2026 and signed by John Irving, Chief Executive Officer, on 29 October 2026.



Clive Condie
Chair



John Irving
CEO