

Manchester Airports Group

Supplier Code of Conduct 2023



Introduction

At MAG, we believe that our core purpose is to provide the airport facilities and travel services that people need to connect with the world.

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.

Our Sustainable Future

MAG is committed to a sustainable future and to improving social, economic and environmental well-being of the community and environment through the investment in and development of renewable energy schemes, reduction in waste and ensuring a sustainable and diverse workforce.

We are proud to have maintained carbon neutral status and independent certification to ISO 14001 for environmental management at each of our airports. Our airport academies offer more than 100 educational courses to our colleagues and members of the local communities, yielding great employment opportunities and in FY22 we provided over 10,700 job referrals across our three airports.

We are also committed to local sourcing – last year, 25% of our suppliers were located within 25 miles of our airports, collectively accounting for 17% of supply chain spend. This meant that we supported our local suppliers across all our airports through extended periods of inactivity caused by COVID-19.

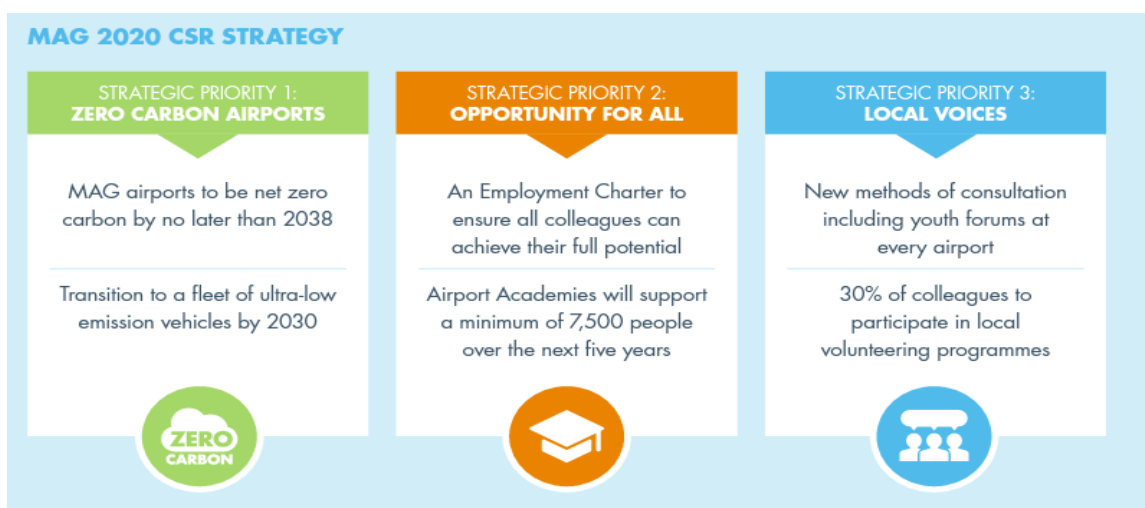
MAG recognises that the size, scale, and ambition of our operations brings significant responsibility to the environment, our local communities, our colleagues, our customers and to local businesses.

We believe that continued sustainable growth of the aviation sector will be a positive force for the UK economy, providing access to international markets and creating thousands of jobs both directly and throughout our supply chains.

A healthy aviation sector, which continues to offer new connections and opportunities, will help continue to re-balance and grow the national economy while allowing the communities and regions around our airports to thrive. We continue to work closely with local communities, to support the education and development of young people and to address the issues that matter most to our local communities.

We also know that delivering growth in the right way is one of our most important challenges. We understand that, as our business continues to develop in the coming years, our airports must work hard to demonstrate to our stakeholders and customers whether locally, nationally, or internationally – that we are committed to operating and growing responsibly and sustainably.

MAG Corporate Social Responsibility (CSR) Strategy, '[Working Together for a Brighter Future](#)', sets out our ambitions and what we plan to achieve across our airports. The Strategy outlines comprehensive commitments across three strategic priorities: Zero Carbon Airports, Opportunity For All and Local Voices.



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. Achieving net zero carbon targets also forms an essential part of our agenda within the procurement function.

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, the environment and decarbonisation efforts. MAG expects and will confirm a fit for purpose approach according to size and industry of the supplier organisation.

We will continue to strive to align and meet our CSR sustainability targets including net zero carbon operations and these will be measured as part of the Procurement Sourcing Process and as part of our Supplier Relationship Management programmes.

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

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.

Please note this email address is **not** 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.

5.3 Anti-Bribery & 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.

MAG's position

Highest standards of ethical conduct and integrity are critical in supporting the achievement of MAG's strategic and business objectives. MAG has a zero-tolerance approach to bribery and has a policy which outlines the position on preventing and prohibiting bribery in accordance with the Bribery Act 2010.

What this means for our suppliers

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

5.4 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.

5.5 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.](#)

5.6 Procurement Regulation

MAG is bound by the Utilities Contracts Regulations 2016 (UCR) which is governed by UK domestic legislation. Where relevant MAG would adhere to the UCR utilising the e-tendering portal 'Find a Tender' (FTS) for the publishing of tenders. This means some degree of advertising, as appropriate to the size of a contract, is necessary when issuing a call for competition for certain procurements that fall within the regulations. This ensures that equal treatment, transparency, 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 call for competition 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.

5.7 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.

5.8 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.

5.9 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)

January 2023