

Etihad Airways Modern Slavery Statement 2024

Introduction

This Modern Slavery Statement (Statement) is made under the United Kingdom (UK) Modern Slavery Act 2015 (UK MSA), and the Australian Modern Slavery Act 2018 (Cth)¹. It sets out the actions taken by Etihad Airways PJSC (Etihad) to assess and address Modern Slavery risks in our operations and supply chain during the financial year ending 31 December 2024. References to the terms 'we' and 'our' are used in this Statement to refer to Etihad.

Modern Slavery refers to offenses of slavery, servitude, and forced or compulsory labor and human trafficking. The company is committed to preventing acts of modern slavery across its operations and supply chains.

Our Structure, Operations and Supply Chains

Established in 2003, Etihad is the national airline of the United Arab Emirates. As of 31 December 2024, Etihad employs approximately 11,000 people worldwide.

Headquartered in Abu Dhabi, Etihad operates international air passenger and cargo services to 71 destinations across Europe, the Middle East, Africa, Australia² and North America. This involves a range of operational activities, including pilot and cabin crew operations, aircraft engineering and maintenance, and other operational airline support services. Etihad's fleet is one of the youngest, most efficient and advanced in the world. We procure goods and services through a diverse global supply chain. The Etihad Sourcing & Procurement Team is responsible for sourcing and managing goods and services for our organisation. This includes aircraft, engines and components, aircraft fuel, aircraft maintenance, airport and ground handling services, in-flight catering and products, IT contracts and properties and facilities services.

Our Actions to Assess and Address Modern Slavery Risks

During this reporting period, we have reviewed and re-organised our environmental sustainability, social responsibility and governance (ESG) structure within our broader governance framework. Etihad is committed to developing a sustainable, equitable and ethical business, including mitigating risks relating to modern slavery. Our ESG framework details our commitment to responsible business practices.

Reporting to the Chief Legal and Compliance Officer, a member of our Executive Leadership Team, the ESG Function is responsible for overseeing the strategic development and effectiveness of our ESG framework.

The management of modern slavery risks in our operations and supply chains will be assessed and managed within our established Enterprise Risk Management framework.

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1. This Statement is currently under consideration for publication by the Australian Government Attorney-General's Department.
 2. Etihad Airways PJSC subsidiaries do not carry out business in the United Kingdom or Australia.
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Risks of Modern Slavery Practices and Human Trafficking

Human Trafficking is a genuine concern within the airline industry, and we recognize that there is always a possibility that air transport services could be used by third parties to transport vulnerable modern slavery victims.

We procure products and services from suppliers in various industries and countries to support our global operations. We are aware that there are risks of modern slavery practices by our suppliers, the degree of risks is largely dependent on the particular country.

We are a global recruiter which could present a risk of exposure to concealed labor exploitation (such as debt bondage) by third parties.

Our Policies and Procedures

We have implemented various policies and procedures that support our modern slavery response, including our Code of Business Conduct, Supplier Code of Conduct, and '*Speak Up at Etihad*' policy. Our policies define our values, and the highest ethical standards of conduct expected from our employees, contractors, suppliers and business partners. This section outlines the key policies relevant to modern slavery.

• Code of Business Conduct

The Code of Business Conduct sets out our values and ethical standards of conduct expected from our employees and contractors. It outlines how we conduct business and emphasizes our commitment to operating ethically and with integrity. As an international organization, we are subject to the laws and regulations of all jurisdictions where we operate or do business, including those related to modern slavery. The Code of Business Conduct states that we are opposed to slavery, human trafficking, forced and child labor and are committed to complying with applicable laws that prohibit such exploitation.

Our employees and contractors have a responsibility to read, understand, and comply with the Code of Business Conduct, other internal policies and applicable laws. They also have a responsibility to Speak Up if they see or experience something that is unethical, or illegal. The Code of Business Conduct is publicly available on Etihad's [website](#) and is published on our internal communication channels.

• Supplier Code of Conduct

We conduct a thorough registration, selection, and due diligence process. The Supplier Code of Conduct applies to all supplier partners of Etihad and is part of the supplier registration process. We expect our suppliers to adhere to our values and ethical standards of conduct. In recognizing our global operations, we have set minimum standards in the Supplier Code of Conduct. These standards include compliance with all relevant employment laws and regulations including statutes that prohibit discrimination, human trafficking, and forced labor in the workplace.



- **Speak Up at Etihad**

We have established reporting procedures and mechanisms that allow employees, contractors, customers, suppliers, business partners, members of the public and other stakeholders to report potential breaches of the Code of Business Conduct and Supplier Code of Conduct, including those related to modern slavery. We provide multiple 'speak up' channels, including our independently managed confidential reporting hotline, the Ethics Line. The Ethics Line is publicly available on Etihad's [website](#) and is also published on our internal communications channels.

We do not tolerate breaches of the code of Business Conduct or the Supplier Code of Conduct, and we take all allegations of breaches seriously, including those related to modern slavery. We will conduct a confidential investigation into any allegations raised in accordance with the process outlined in the Speak Up at Etihad Policy. In cases of confirmed breaches of the Supplier Code of Conduct, we may review our business relationship with the supplier, which could result in the termination of the contract. During the reporting period, no specific remediation measures were required in respect of modern slavery, as no such incidents were reported through the Speak Up Channels or otherwise.

Training and Awareness

- **Human Trafficking Face-to-Face Training for Cabin Crew**

We continued to deliver tailored face-to-face training sessions to all cabin crew, as part of their Initial Qualification Programme. The face-to-face training sessions are designed to educate our cabin crew in identifying, managing and reporting potential human trafficking risks, common indicators, and red flags during our flight operations, including the recognition of potential trafficking victims who may be travelling as passengers.

Assessing the Effectiveness of our Actions

As part of our governance framework, we continuously monitor compliance and assess the effectiveness of our policies and procedures. We review all concerns raised through our formal reporting channels. As noted above, no relevant incidents were reported through the Speak Up Channels or otherwise.

Further Steps to Prevent Modern Slavery

We are committed to continuously assessing the effectiveness of the actions taken to combat modern slavery in our operations and supply chains. We will continue to review and strengthen our existing policies and procedures to effectively assess, prevent, and mitigate modern slavery risks in our business.

Approval

This Statement was approved by the Board of Etihad on 26 May 2025 and is signed by HE Mohamed Ali Al Shorafa Al Hammadi in his role as the Chairman of the Board of Etihad.

