AIR NEW ZEALAND

Modern Slavery Statement 2025

This report is made pursuant to the Australian Commonwealth's Modern Slavery Act 2018 (Cth), the United Kingdom's Modern Slavery Act 2015, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act for the reporting period 1 July 2024 – 30 June 2025.

STAR ALLIANCE

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Letter from the Chair and CEO

Dame Therese Walsh
Chair

Nikhil Ravishankar
Chief Executive Officer

Kia ora koutou,

Air New Zealand continued to move forward with purpose this year, laying strong foundations for the future.

As Aotearoa New Zealand's national carrier, Air New Zealand recognises both the responsibility and the opportunity to address modern slavery risks across our operations and supply chains. Modern slavery remains one of the most pressing global human rights challenges, undermining dignity and wellbeing. Protecting human rights is not simply a compliance obligation for Air New Zealand – it is a reflection of who we are as a business and as the national carrier for our country.

In 2025, Air New Zealand continued to strengthen its approach to identifying, managing, and mitigating modern slavery risks. We advanced our systems, culture, and partnerships to ensure that the people who enable our airline to thrive – our team, customers, suppliers, and communities – are treated fairly, respectfully, and with care.

Key highlights from 2025 include:

- Developing a new Sustainability Framework, reaffirming our commitment to protecting and uplifting the people in our operations, supply chains, and communities;
- Ratifying 11 collective employment agreements and maintaining strong engagement with the five unions representing 90% of employees whose roles are covered by collective employment agreements;
- Being recognised for the third year in a row as Aotearoa New Zealand's most attractive employer by Randstad;
- Launching an updated Supplier Code of Conduct with strengthened expectations on human rights and supply chain due diligence;
- Developing a draft Responsible Sourcing Due Diligence procedure, including benchmarking and recognising third-party social practice schemes;
- Establishing a new standard operating procedure for responding to Supplier Speak Up reports, to support fair and responsible investigations;
- Creating a cross-functional Modern Slavery Working Group to coordinate oversight and continuous improvement across the airline; and
- Participating in the Modern Slavery Aviation Forum, engaging with Australia's Anti-Slavery Commissioner, and piloting the International Air Transport Association's (IATA) Sustainable Procurement standard to support shared learning and best practice across the aviation sector.

These actions reflect our ongoing commitment to working collaboratively with our stakeholders and peers to help address modern slavery.

This Statement was approved by the Air New Zealand Board on 19 November 2025, on behalf of Air New Zealand Limited and its controlled entities.

Dame Therese Walsh
Chair
19 November 2025

Nikhil Ravishankar
Chief Executive Officer
19 November 2025

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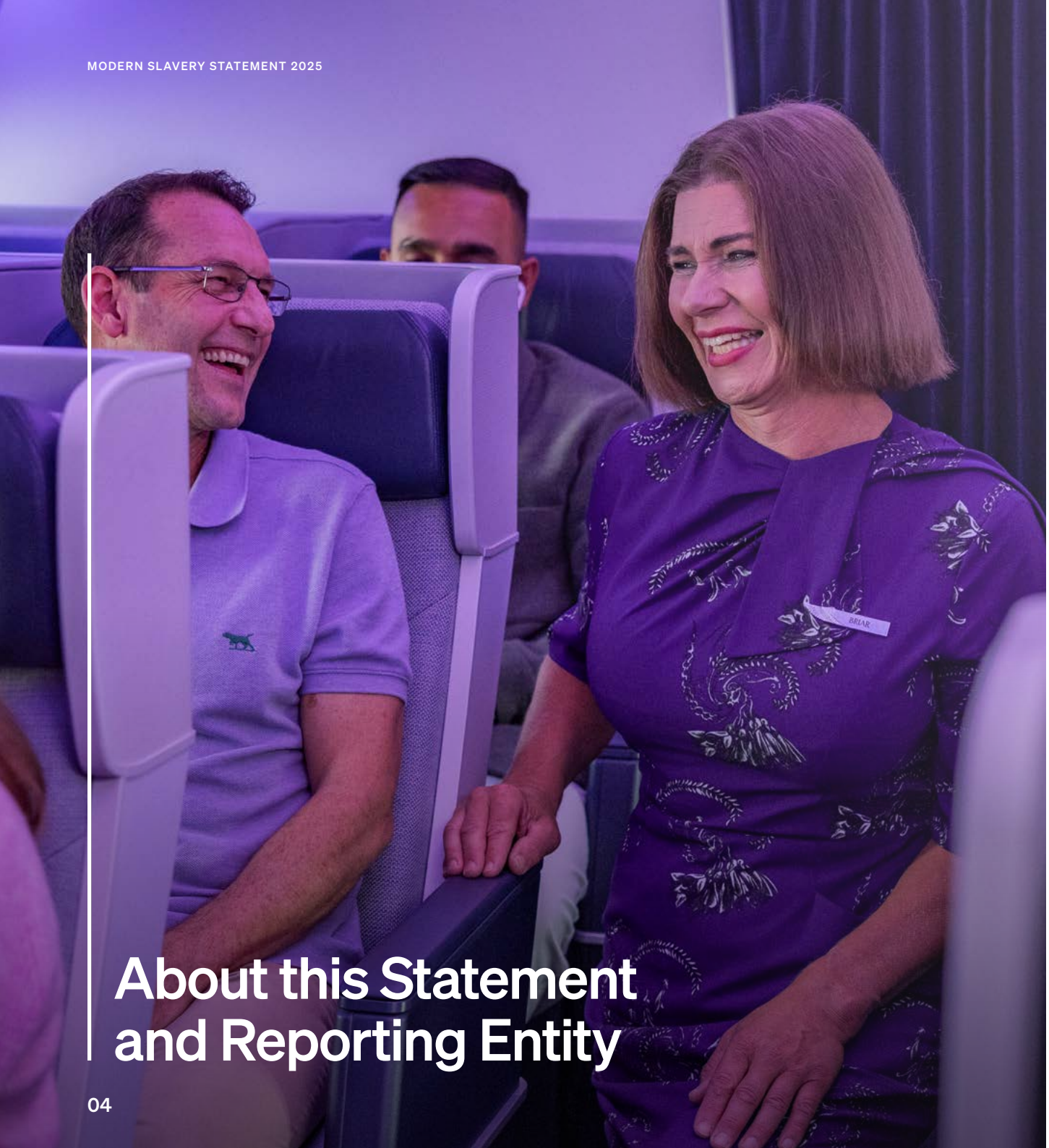

About this Statement and Reporting Entity

This Modern Slavery Statement (Statement) is made on behalf of Air New Zealand Limited and its controlled entities (together referred to as "the Group" or "Air New Zealand"). The parent company, Air New Zealand Limited ("the Company"), is domiciled in New Zealand, registered under the Companies Act 1993 and listed on the New Zealand Stock Exchange (NZX) and Australian Securities Exchange (ASX).

This Statement is made pursuant to the United Kingdom's Modern Slavery Act 2015, Australia's Modern Slavery Act 2018 (Cth) and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending 30 June 2025 (referenced as 2025 throughout the Statement). It outlines the steps Air New Zealand Limited and its controlled entities took to identify, assess, and manage modern slavery and human trafficking risks in its operations and supply chains during 2025. The information presented in this Statement is provided as a consolidated description for the Group.

For the purposes of the Australian Modern Slavery Act 2018 (Cth), Air New Zealand Limited is the only "reporting entity" within the Group. Its subsidiary companies are ultimately 100 percent owned by Air New Zealand Limited (Appendix 1). Operational activities relating to this business are generally carried out through Air New Zealand Limited, including contracting with employees, suppliers, contractors and airport companies (noting there were some legacy employment contracts under Mount Cook Airline Limited, Air Nelson Limited and Air New Zealand Regional Maintenance Limited, which have all now been transitioned to Air New Zealand Limited). Directors and management of the subsidiary companies are employed by Air New Zealand Limited and Air New Zealand Limited has ensured that the subsidiary companies have had relevant engagement on modern slavery risks and the development of this Statement.

Monetary amounts in the Statement are reported in New Zealand dollars, unless otherwise stated.

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Our guiding purpose is to enrich our country by connecting New Zealanders to each other, and New Zealand to the world.

This is an idea that has been at the heart of our airline since the very beginning. Embedded in this purpose is a promise to our people, our customers and our community.

The promise is manaaki - taking care further than any other airline.

This idea of care is encapsulated in our values and is implicit in everything we do - from taking care of each other, our customers, our environment and the communities we serve.

Share your AOTEAROA

Ko Aotearoa e ngunguru nei
Aotearoa New Zealand
is a vibrant land

CANdo.

Whāia te iti kahurangi
Strive for what matters most and
don't let obstacles get in your way

BeYourself

He toa takitini
Be proud of who you are
and where you have come from

Welcome as a friend

Ko au ko koe, ko koe ko au
I am you and you are me

Our purpose

Our Sustainability Framework

Our airline's future is inseparable from the wellbeing of Aotearoa New Zealand, and it's this unique connection that inspired our new Sustainability Framework: When New Zealand thrives, we thrive too.

Developed in 2025, the framework is built on three interconnected pillars – People *He tāngata*, Planet *Te Taiao*, and Guardianship *Kaitiakitanga*. It reinforces our commitment to protecting and uplifting people in our operations, supply chains, and communities, while embedding sustainability into the way we operate every day.

This framework underpins our approach to managing human rights and modern slavery risks throughout our operations and supply chains.

When New Zealand thrives, we thrive too

Ki te kotahi kākaho whati, ki te kāpuia e kore e whati
When we stand alone we are vulnerable, but together we are unbreakable

People
He tāngata

We care for our people by keeping them safe, preparing for the future, and supporting all our teams to thrive.

We enrich the lives of our customers and are a positive part of the diverse communities we connect and serve.

We are responsible for our supply chain and promote positive impact and change.

Planet
Te Taiao

We are working towards net zero carbon emissions by 2050.

We focus on designing, buying and using products and resources that support the circular economy, and actively work to reduce waste.

Guardianship
Kaitiakitanga

We are the caretakers of Air New Zealand for future generations.

We help develop Aotearoa New Zealand as a sustainable visitor destination, benefitting visitors, communities, the environment and the economy.

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At Air New Zealand we provide world-class air passenger and cargo services to, from and within New Zealand.

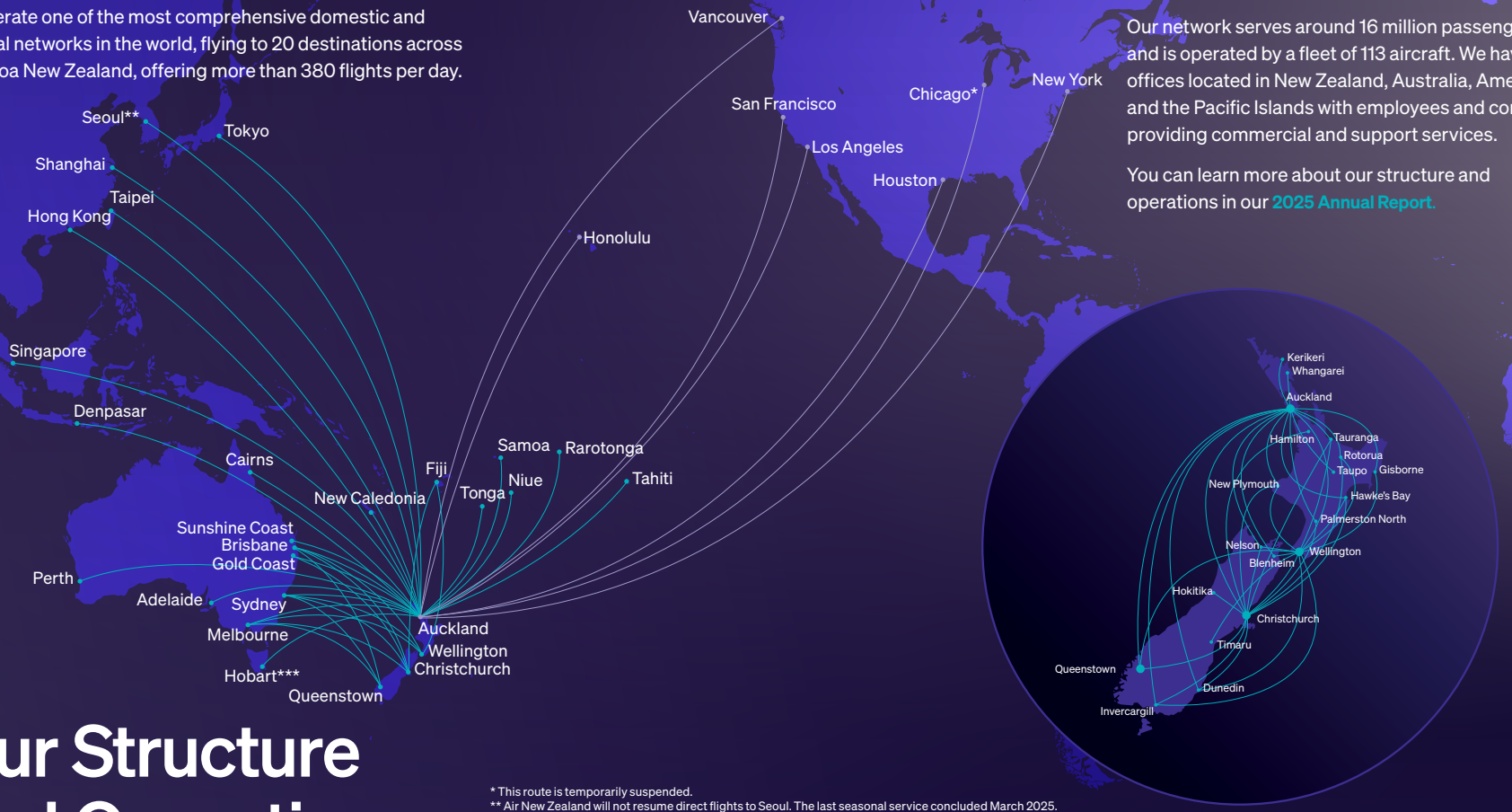
We operate one of the most comprehensive domestic and regional networks in the world, flying to 20 destinations across Aotearoa New Zealand, offering more than 380 flights per day.

Internationally, our strategic focus and competitive advantage lie within the Pacific Rim where our network reach extends from New Zealand into Australia, the Pacific Islands, Asia and North America.

Alongside key global alliance partners, including United Airlines, Singapore Airlines, Cathay Pacific and Air China, we connect New Zealand to more than 600 destinations worldwide.

Our network serves around 16 million passengers a year and is operated by a fleet of 113 aircraft. We have 76 offices located in New Zealand, Australia, America, Asia, and the Pacific Islands with employees and contractors providing commercial and support services.

You can learn more about our structure and operations in our **2025 Annual Report**.



Our Structure and Operations

* This route is temporarily suspended.
** Air New Zealand will not resume direct flights to Seoul. The last seasonal service concluded March 2025.
*** Auckland to Hobart is a seasonal service operating between October-March.

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Our Team

12,287 workforce[2]

12,236 employees

3 UK

83 North America

1 South America

178 Asia

108 Pacific

93 Australia

11,821 New Zealand

Air New Zealand is committed to fostering a workplace where our people feel valued, included, supported, and able to thrive. We recognise that our people are at the heart of our success, and we are committed to continuously strengthening their experience.

In 2025, the airline was named Aotearoa New Zealand's most attractive employer by Randstad for the third consecutive year. At the same time, our employee engagement index score as of June 2025 was 69[1] (compared with the Glint Global Top 25 percent benchmark of 78), representing a slight decrease from our 2024 score of 70. While this result is below our aspirations, we are continuing to actively work with our people leaders and teams to understand the drivers behind engagement and to implement meaningful actions that support a positive employee experience.

The Company's Diversity, Equity & Inclusion (DE&I) strategy recognises that a workforce reflecting the richness and diversity of Aotearoa New Zealand strengthens our business resilience and innovation. The strategy aims to foster an open, inclusive environment for our team, customers, whānau, and communities. Diversity is considered across multiple measures – including gender, ethnicity, disability, age, and sexual identity. Recruitment practices are designed to attract and retain a diverse range of talent, and a broad suite of initiatives support and develop our people once they are onboard. Air New Zealand's 10 Employee Networks play a key role in supporting and advocating for employees, ensuring the success of the airline's DE&I strategy and providing a space where employees can connect and access support.

You can learn more about our **DE&I approach here.**

In 2025, 99.6 percent of our workforce[2] were directly employed, either under an individual or collective agreement, giving us direct oversight of employment terms. This provides assurance that employment complies with current legislation and reflects fair labour standards. Seventy eight percent of employees work in roles covered by collective agreements, and 90 percent of those employees are represented by a union. In 2025, 11 union agreements were ratified, further reinforcing our commitment to fair, transparent, and constructive employment relations.

By maintaining strong engagement, inclusion, and oversight of employment practices, Air New Zealand mitigates the risk of labour exploitation and reinforces our commitment to preventing modern slavery in our operations.

1. This score is out of 100 and based on the responses to two questions in our Employee Survey which is run three times a year on the Glint platform - 'How happy are you working at Air New Zealand' and 'I would recommend Air New Zealand as a great place to work'. Responses are measured on a 5-point scale.
2. Workforce includes employees and contingent workers as at 30 June 2025. It excludes employees on Parental Leave / Extended Leave without Pay, Persons of Interest, and Airport Contractors. The mapped figures represent both employees and contingent workers.

Potential risks in our operations

Air New Zealand continues to assess potential modern slavery risks across its operations. As in previous years, the risk within our directly recruited workforce (employees and contractors engaged by Air New Zealand) is considered low, due to the strong policies, training, monitoring, and controls in place.

The airline acknowledges there may be higher inherent risks in our indirectly recruited workforce, where workers are engaged through third-party providers. In 2024, we reviewed our controls to manage these inherent risks and began implementing identified improvements. This included revising the internal Worker Type Matrix to ensure there is clearer guidance to our teams on the vetting and onboarding requirements for third-party labour within our operations. This strengthens safeguards to minimise potential risks of exploitation.

Like all global airlines, Air New Zealand also acknowledges the risk that our services may be misused by traffickers to facilitate human trafficking within and between countries. The operational roles most likely to encounter such risks are cabin crew and pilots, who are therefore provided with specialist training to identify indicators of trafficking and report concerns discreetly and appropriately. These measures are detailed further in the section Human Trafficking, Procedures and Reporting (see page 10).

Addressing potential risks in our operations

CODE OF CONDUCT AND ETHICS

The Air New Zealand Code of Conduct and Ethics (the Code) sets out our business principles and the behaviours expected from all employees and contractors. This Code makes it clear that the airline will not tolerate modern slavery of any kind in our operations or supply chains. It also embeds our commitment to applying social, ethical, and environmental considerations in procurement and supply chain decisions.

All team members and contractors must acknowledge that they've read, understood, and agreed to abide by the Code, and must complete annual refresher training on the Code's obligations. The Code is formally reviewed at least every three years to ensure it remains up to date and effective. A refreshed Code was published in 2025, following consultation with key internal stakeholders and trade unions, and approval by the Board. This update included strengthened wording on upholding human rights and preventing modern slavery.

At the heart of the Code are our Business Principles, enriched through the power of five whakataukī (Māori proverb) gifted to Air New Zealand:

Treat people fairly and with respect
Ko Aotearoa e ngunguru nei

Operate safely, responsibly and reliably
He toa takitini

Act with integrity, honesty and transparency
Whāia te iti kahurangi

Protect our people, property and information
Ko au ko koe, ko koe ko au

Comply with the law
Toitū te Tikanga Māori

Together, these principles provide the cultural foundation for our approach to human rights, ethical business practice, and modern slavery prevention.

Supporting the Code are a number of policies that set out specific commitments and safeguards, including:

- Health, Safety and Wellbeing Policy
- Workplace Bullying Prevention and Complaints Policy
- Harassment and Sexual Harassment Prevention and Complaints Policy
- Just Culture and Reporting Policy
- Diversity, Equality and Inclusion Policy
- Employee Privacy Statement
- Anti-bribery and Corruption Policy
- Disciplinary Policy
- Sustainability Framework and Policy

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UNION STRATEGIC ENGAGEMENT CHARTER

Air New Zealand and the unions representing Air New Zealand employees (Aviation and Marine Engineers' Association, E tū Incorporated, Federation of Air New Zealand Pilots, the Flight Attendants Association of New Zealand Incorporated and New Zealand Air Line Pilots' Association), have agreed to work together under the terms of a Strategic Engagement Charter. The Charter aims to establish a collaborative culture between the parties to ensure the success of Air New Zealand, its employees, and the unions.

The Charter recognises (amongst other things):

- That Safety, Health and Wellbeing are paramount.
- That Air New Zealand employees have meaningful, direct, and substantive involvement in problem solving, initiating improvements and the decision-making process using analytical tools and structured processes.
- A collaborative relationship should exist throughout the organisation - between unions, between the Company and unions, between the unions collectively and the Company, between employees and the unions, and between employees and the Company.
- The parties prioritise interest-based problem-solving behaviours and methods for the resolution of disputes and disagreements rather than positional approaches.
- Manaakitanga, the uplifting of the mana of individuals or groups, and the inherent reciprocity of that action between the parties to the Charter.
- That Air New Zealand respects and supports the role(s) of unions in the workplace.
- An environment of trust is based on open and honest communication.

A governance group with key leaders from Air New Zealand and each of the participating unions meet at least quarterly to provide oversight, direction, guidance, strategy, and decision-making to develop and support working together collaboratively to meet the objectives of the Charter.

To help our people better understand the Charter and the way Air New Zealand works with unions, a team of Air New Zealanders and union leaders developed an online learning module that has been made available to all employees in 2025.

TEAM TRAINING AND CAPABILITY BUILDING

All our team members and contractors are required to undergo training modules on an annual basis, including training on Air New Zealand Code of Conduct and Ethics (which includes a section on seeking support, reporting concerns, and using Speak Up). In 2025, 91.2 percent of our employees and contractors (excluding pilots and cabin crew who run on a separate rostered training programme) had completed their annual Code of Conduct training. All pilots and cabin crew completed their mandatory training.

SPEAK UP

Air New Zealand's team members, contractors and suppliers are encouraged to raise concerns about potentially unethical or illegal conduct. To support this, the airline has mechanisms in place including a 'Speak Up' service where concerns can be raised confidentially and without fear of retaliation or harassment. This service is available 24 hours a day, 7 days a week by phone[3], post or online and is operated by an independent third-party provider on behalf of Air New Zealand.

The Speak Up services are promoted to employees and contractors through training, posters, and an annual promotional campaign. Our Just Culture and Reporting Policy and procedures support a fair and confidential process to investigate and address issues in a responsible and appropriate manner.

In 2025, we received 17 Speak Up reports from either employees or contractors. Sixteen of those reports have been closed. One remained open at the end of 2025, with an investigation in progress. None of the reports related to modern slavery or human trafficking allegations in our operations.

HUMAN TRAFFICKING PROCEDURES, TRAINING AND REPORTING

Air New Zealand recognises that aviation can be misused by traffickers and is committed to ensuring our operations do not facilitate human trafficking. As part of required training, all Air New Zealand's customer-facing team – including front-of-house ground employees, airport managers, cabin crew and pilots – receive dedicated education on human trafficking.

This training, delivered through both e-learning modules and classroom-based discussions, equips our people to:

- Understand the nature of human trafficking and how it may present during air travel;
- Recognise key behavioural and situational indicators that may signal a potential trafficking situation; and
- Follow clear reporting pathways to escalate concerns discreetly and appropriately.

A major milestone in 2025 has been the publication of new procedures to guide our people in managing suspected in-flight trafficking cases. These procedures, rolled out in early March and now embedded into the Cabin Safety Manual (CSM) for cabin crew and the Airport Passenger Handling Manual (APHM) for ground staff, provide clear and practical steps to ensure any suspicions are handled in a way that prioritises passenger safety while maintaining crew discretion.

The development of these procedures was the result of a collaborative effort involving both internal and external stakeholders. Consistent with the International Air Transport Association's (IATA) best practice framework, the procedures stress:

- The "do no harm" principle ensuring suspected victims are not placed at greater risk;
- Discreet observation and communication, avoiding confrontation or alerting potential traffickers;
- Timely reporting to designated internal channels and onward to appropriate law enforcement authorities; and
- Collaboration with government partners, including the Ministry of Business, Innovation and Employment (MBIE) and Immigration New Zealand, to ensure a joined-up and effective response.

Air New Zealand applies international best practice, drawing directly on guidance from the International Civil Aviation Organization (ICAO) and IATA, while ensuring our approach is tailored to the New Zealand operating context.

In 2025, our crew reported four suspected cases of human trafficking, each based on observable indicators. These cases were investigated and while none were substantiated as human trafficking events, the reporting demonstrates that our training and procedures are actively enabling our people to identify potential risks and respond appropriately.

3. The phone service is operated by a call centre that functions 24 hours a day, seven days a week. Callers are connected to a Speak Up operator, who is available between 7:00am and 9:00pm NZT, and may be available outside of these hours on a reasonable endeavours basis.

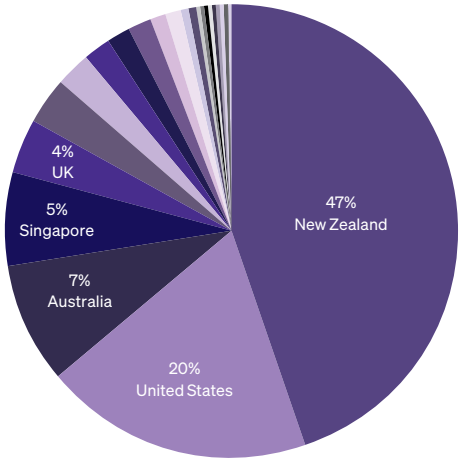
Air New Zealand's supply chain presents one of our most significant areas of risk for modern slavery due to its scale and complexity.

Our supply chain is centralised, sourcing goods and services from around the world – including aircraft and aircraft parts, onboard products, catering, as well as corporate and digital solutions. The international nature of our operations means our suppliers operate across a range of geographical and regulatory environments.

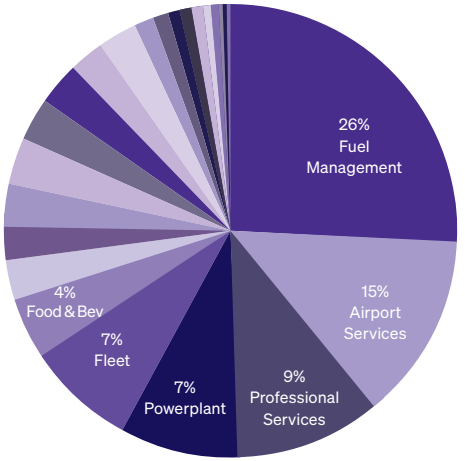
In 2025, we had 5,625 active Tier 1 (direct) suppliers from 52 countries, with most based in Aotearoa New Zealand.[4] Behind these direct suppliers sits a far more complex network of indirect suppliers, where visibility and influence are more limited.

Our Supply Chain

TOP COUNTRY SPEND[4]



TOP CATEGORY SPEND[4]



$5.6B
Supplier spend

5,625
Number of direct suppliers

47%
Spend in Aotearoa New Zealand

4. Excludes suppliers of statutory fees and charges.

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Potential risks in our supply chain

Air New Zealand's supply chain is large, complex, and global, and we therefore rely on a range of tools to assess and manage risk. Gaining full visibility across this multilayered network remains a challenge, particularly as the airline has less control, influence and engagement further down the supply chain.

Since 2024, Air New Zealand has partnered with Fair Supply, a third-party platform that conducts modern slavery risk analysis on both existing and potential suppliers. In 2025, we drew on these insights to guide our supplier due diligence, with an initial focus on addressing areas of elevated risk as a priority.

It's important to note that aircraft leases and financing are managed outside of Air New Zealand's typical procurement process. These activities are managed by the airline's Fleet and Corporate Finance teams through Air New Zealand Aircraft Holdings Limited. In 2025, the airline held commercial agreements with six lessors, all considered low risk. Draft lease and financing agreements are reviewed by the Airline Commitment Quality Assurance (ACQA) Committee, which brings together technical experts from across the business – covering areas such as risk, finance, tax, insurance, legal, privacy, information security, safety, procurement, and sustainability. The purpose of the ACQA Committee is to protect against high-risk decisions being made without consultation and to ensure risks have been identified and addressed. Any concerns or escalations raised by ACQA are shared with contract owners or initiative leads to address before a final commitment is made. In addition, low-value transactions may occasionally be made by teams using corporate credit cards or manual cheques.

SUPPLY CHAIN RISK ASSESSMENT

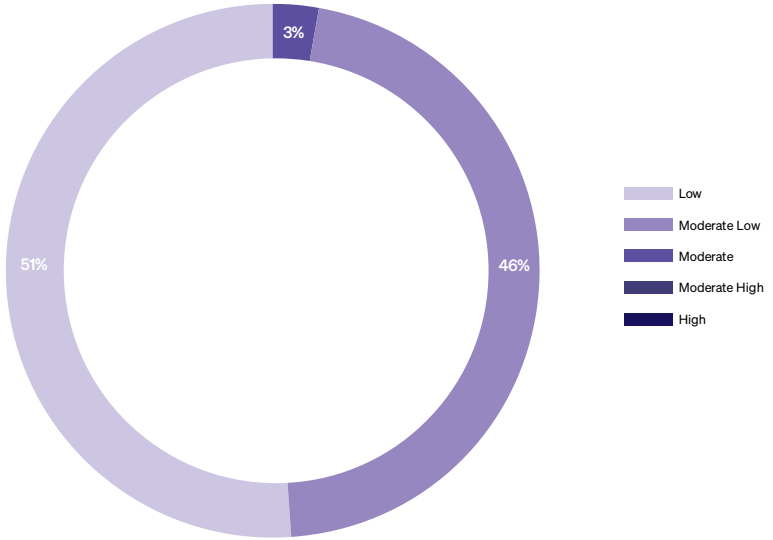
In 2025, Air New Zealand assessed 4,215 contestable spend suppliers[5] with expenditure during 2025 to evaluate inherent modern slavery risks across our supply chain.

Using Fair Supply's proprietary technology, the analysis traced the economic inputs behind the products and services we procure, supported by a global Multi-Regional Input-Output (MRIO) model – drawing on data from 208 countries and over 37,000 industry-country combinations covering more than 98% global GDP.

The assessment identified areas of potential risk by industry and geography, mapping these risks across supply chain tiers to the 10th level. The MRIO model is regularly updated and combines internationally recognised economic datasets with leading modern slavery research, including the Global Slavery Index, International Labour Organisation estimates, United States Government reports, and proprietary consultant data.

This approach gives Air New Zealand a detailed understanding of where risks are most concentrated, enabling prioritisation of due diligence and action in higher-risk areas. While 60 suppliers were identified as having High to Moderate-High inherent sector-level risk, these represented 0.3% of total contestable spend in 2025.

Inherent risk profile of contestable spend in 2025 (by spend, at an industry category/country level)



5. Contestable spend excludes the hedged portion of fuel, airport fees, aircraft, taxes, e-store, Tandem and labour.

Addressing potential risks in our supply chain

OUR SUPPLY CHAIN MODERN SLAVERY RISK MANAGEMENT CONTROLS:

SUPPLIER CODE OF CONDUCT & ASSURANCE

Air New Zealand is committed to the highest standards of social and environmental responsibility and ethical conduct. Our **Supplier Code of Conduct** reinforces these commitments by setting clear expectations for all suppliers on sustainability, transparency, and respect for human rights.

The Supplier Code of Conduct requires suppliers to:

- Respect the labour rights of workers in their operations and supply chains;
- Monitor and manage human rights risks within their own supply chains; and
- As a minimum, ensure that all workers engaged in the manufacture and supply of goods and services are employed voluntarily. Under no circumstances is any form of forced, coerced, bonded, indentured, or involuntary labour permitted.

In 2024, Air New Zealand began a review of the Supplier Code of Conduct to reflect updated policies, new insights, and stakeholder feedback. Independent input was sought from modern slavery experts Fair Supply, whose advice identified opportunities to further strengthen our approach.

As a result, the updated Supplier Code of Conduct includes:

- Enhanced and clarified requirements on managing modern slavery risks; and
- A new section outlining our expectation that direct suppliers undertake their own supply chain due diligence.

The refreshed Supplier Code of Conduct was launched to our teams and suppliers in 2025. It is generally embedded into supplier contracts, with supplier acknowledgements recorded in Ivalua, our procurement and supplier management system.

The 2025 launch provided an opportunity to engage suppliers who had not yet provided assurance to previous versions of the Supplier Code of Conduct and encourage their formal commitment to the Code. As of 2025, suppliers representing 83.9 percent of our contestable spend[6] (up 2.9 percent from financial year 2024) and 55.3 percent of our supplier base[7] (up 13.3 percent from financial year 2024) have provided positive assurances through Ivalua that they accept and commit to the Supplier Code of Conduct. The Procurement team continues to seek formal acknowledgement from the remaining suppliers.

Through these measures, the Supplier Code of Conduct continues to act as a cornerstone of Air New Zealand's responsible sourcing programme, ensuring that expectations on modern slavery prevention and broader human rights are clearly communicated, contractually reinforced, and transparently tracked.

PROCUREMENT POLICY

Air New Zealand's Procurement Policy sets out the standards and processes governing how we engage with suppliers. It provides a framework for:

- Appointing new suppliers and conducting due diligence;
- Establishing and executing supply arrangements and contracts;
- Making purchases and placing orders; and
- Monitoring compliance with contractual requirements, including adherence to the Supplier Code of Conduct and our human rights expectations.

The policy was formally reviewed in 2025 as part of the airline's group policy review cycle. Proposed revisions include strengthened commitments to respecting labour and human rights and clear mandate to identify and address modern slavery in supply chains. Consultation on these revisions included key internal stakeholders and trade unions, reflecting a collaborative and transparent approach.

At the end of 2025, the revised policy was with the Policy Management Committee for final review, with final approval expected in the 2026 financial year (2026). Once approved, the updated policy will reinforce our due diligence framework and provide enhanced clarity for our teams on how we uphold human rights across our supply chains.

6. Based on percentage of contestable spend. This excludes the hedged portion of fuel, airport fees, aircraft, taxes, e-store, Tandem, labour and the spend by any supplier with an annual amount below $150,000.
7. Based on percentage of suppliers with contestable spend. This excludes the hedged portion of fuel, airport fees, aircraft, taxes, e-store, Tandem and labour.

RESPONSIBLE SOURCING POSITION STATEMENTS

Air New Zealand recognises that certain commodities and emerging markets present elevated sustainability and labour rights risks within their supply chains, including risks of modern slavery beyond Tier 1 direct suppliers. To address these, we have established responsible sourcing position statements for specific high-risk categories, including palm oil, sustainable aviation fuel (SAF), and voluntary nature-based carbon removal credits.

These position statements support us to ensure that our climate and sustainability initiatives not only reduce environmental impacts but also uphold human rights standards and strengthen modern slavery prevention throughout supply chains.

For palm oil, Air New Zealand requires in-scope products to use or transition to Roundtable on Sustainable Palm Oil (RSPO) certified ingredients, helping to mitigate environmental and labour-related risks associated with production.

In 2025, we formalised a SAF Sourcing Position Statement, which requires suppliers to mitigate adverse environmental and social risks in the supply chain, particularly regarding feedstock sustainability. Suppliers must adhere to recognised certifications such as RSB and ISCC. These certifications include provisions for labour rights and fair working conditions across the supply chain. SAF suppliers must also complete Air New Zealand's Modern Slavery Questionnaire and comply with our Supplier Code of Conduct. In 2025, Air New Zealand uplifted 1.7 percent of SAF as a proportion of total jet fuel volumes.

In 2025, we also developed the Voluntary Nature-Based Carbon Removals Position Statement outlining Air New Zealand's commitment to purchasing high-integrity, voluntary nature-based carbon removal credits to support the Company's 2030 Emissions Guidance and long-term goal of reaching net zero carbon emissions by 2050. While no credits were purchased in 2025, the policy establishes a framework for future supplier engagement and sets clear expectations for mitigating adverse environmental and social risks, including upholding internationally recognised human rights and labour standards. The approach recognises and aligns with third-party standards such as Verra and Gold Standard, both of which include explicit human rights and labour requirements.

CONTRACTUAL CLAUSES

Air New Zealand embeds human rights expectations directly into our commercial relationships through our standard supply contract templates. These include a contractual obligation for suppliers to comply with our Supplier Code of Conduct, which prohibits modern slavery and sets clear expectations on labour rights and ethical practices.

Under these contracts, suppliers are required to:

- Report any non-compliance with the Supplier Code of Conduct;
- Implement remedial action plans where non-compliance is identified; and
- Accept that contracts may be terminated if remediation is not possible or not undertaken.

Where Air New Zealand contracts on a supplier's template rather than our own, we actively seek to incorporate equivalent obligations to uphold the Supplier Code of Conduct.

Through these measures, we ensure that contractual arrangements are not only commercial in nature, but also a mechanism for preventing, addressing, and remedying modern slavery risks in our supply chains.

SUPPLIER QUESTIONNAIRE

Air New Zealand's supplier onboarding workflow in Ivalua includes a Supplier Questionnaire designed to identify potential risk indicators, including those linked to modern slavery. Responses are reviewed by the Procurement team, who assess and manage any red flags through targeted engagement with suppliers.

In 2025, we strengthened this approach by implementing the use of Fair Supply's Modern Slavery Self-Assessment Questionnaire. The initial focus has been on suppliers assessed as having elevated inherent risk, using the tool to gain deeper insights into how our suppliers:

- Identify and assess potential modern slavery risks within their operations and supply chains; and
- Implement processes to manage, mitigate, and remediate them.

This enhanced due diligence supports more meaningful engagement with suppliers and enables us to focus attention on areas of greatest potential impact. It also provides a baseline to track supplier progress over time, building transparency and accountability across our supply base.

Suppliers representing 11 percent of the estimated modern slavery risk (based on Fair Supply's risk assessment of Air New Zealand's contestable supplier spend during 2025[8]) have completed these more detailed Modern Slavery Self-Assessment Questionnaires.

In 2026, Air New Zealand plans to expand the rollout of these questionnaires to cover a greater share of supplier spend and risk.

AUDITS AND SITE VISITS

Since commencing direct sourcing with several manufacturing companies in China in 2013, Air New Zealand has maintained an audit programme to identify and mitigate modern slavery risks within this part of our supply chain. While Tier 1 (direct) suppliers may sub-contract manufacturing services to Tier 2 (indirect) partners, our audit programme applies to the manufacturing site regardless of tier, focusing on this higher risk part of the supply chain.

Audits assess compliance with recognised labour and human rights standards while also building supplier awareness and capability. Findings are categorised by severity, and corrective action plans are required where non-conformance is identified. Follow-up audits verify implementation of improvements.

In 2025, the airline audited five manufacturing sites. While there were some Minor and Major non-conformances identified, there were no Critical (serious breach) non-conformances identified. Corrective action plans have been agreed with these suppliers to address the findings.

Until 2024, Air New Zealand commissioned stand-alone SGS audits conducted solely for its own purposes. To reduce duplication and recognise that many suppliers undergo social compliance audits for other customers, Air New Zealand began accepting Sedex SMETA audits in 2024 – the world's most widely used social compliance audit.

In 2025, we conducted a benchmarking exercise to identify additional third-party schemes that could be recognised as acceptable evidence of ESG-related risk mitigation, particularly for higher-risk suppliers.

Assessment criteria for recognition included:

— Relative alignment with Air New Zealand's Supplier Code of Conduct;

— The credibility and governance rigour of the audit scheme; and

Inclusion of worker interviews, ensuring employee voices are heard.

This list of acceptable schemes was independently reviewed by Fair Supply.

Recognising acceptable audit schemes acknowledges that suppliers may already undertake audits for other customers or compliance purposes. By accepting these, Air New Zealand reduces duplication while maintaining confidence that appropriate risk mitigation and corrective actions are in place. We also recognise that no audit scheme is without limitations. For this reason, third-party audits are treated as one element of our broader due diligence framework. We continue to engage directly with suppliers, monitor emerging best practices, and refine our process to drive continuous improvement.

Some of the audit schemes Air New Zealand has identified as acceptable for validating supplier performance and ensuring higher-risk suppliers meet internationally recognised labour and human rights standards include:

— Amfori BSCI
— Bonsucro
— Fair Labor Association
— Fair Trade
— Global GAP GRASP
— International Sustainability and Carbon Certification (ISCC)
— Rainforest Alliance
— Responsible Business Alliance (VAP audits only)
— Roundtable on Sustainable Biomaterials (RSB)
— Sedex SMETA (preferably a 4-Pillar audit)
— SGS Responsible Supply Chain Assessment
— Social Accountability SA 8000
— Worldwide Responsible Accredited Production (WRAP)

Other schemes may be reviewed and added to this list over time.

8. Contestable spend excludes the hedged portion of fuel, airport fees, aircraft, taxes, e-store, Tandem and labour.

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RISK RADAR

Another tool Air New Zealand uses to identify, assess and monitor potential risk areas in its supply chains is Sphera's Risk Radar, previously Risk Methods. Risk Radar leverages artificial intelligence to monitor our supplier community and reveal risks in real time. It uses hundreds of data sources and thousands of monitored news sites to assess a variety of risks, including financial risk, natural hazard risk, reputational risk, geopolitical risk, man-made risk and cyber risk, and human rights risks. Risk alerts are tracked in our supplier management system, triaged, and managed by our procurement team.

EDUCATION

Air New Zealand supports its people in understanding the risks of modern slavery and human trafficking through training and awareness initiatives. This includes online learning modules covering our approach to modern slavery, the Code of Conduct, the Supplier Code of Conduct, and the Speak Up service.

In 2025, the airline also delivered a dedicated training session to the Procurement and Legal teams on the refreshed Supplier Code of Conduct, highlighting the strengthened expectations around human rights and labour standards. In addition, risks and best practice recommendations continue to be shared through team meetings and briefings across the airline as needed.

COLLABORATION

Air New Zealand recognises that addressing modern slavery requires collective action across industries and borders. Collaboration enables us to share knowledge, align practices, and drive more consistent and effective change than any organisation can achieve alone.

In 2024, we supported the establishment of the Modern Slavery Aviation Forum alongside Qantas and Virgin Australia. The forum provides a trusted space to discuss industry challenges and share learnings on addressing modern slavery, within the boundaries of competition law. In 2025, the forum met three times, covering topics such as supplier due diligence approaches and managing human trafficking risks in aviation. The members also engaged with the Australian Anti-Slavery Commissioner and his team, exploring insights and experiences on addressing modern slavery in the aviation sector.

In 2025, Air New Zealand also joined ten leading carriers in a global pilot to shape IATA's new Sustainable Procurement Certification Standard. Once launched, this standard will provide aviation with a consistent, measurable pathway to sustainable procurement – including embedding social practice criteria into supplier and product assessments.

SUPPLIER SPEAK UP

Air New Zealand recognises that effective grievance mechanisms are a critical component of modern slavery risk management. Since 2024, suppliers and their workers have been able to access our Speak Up service, offering a safe, confidential way to raise concerns about potential misconduct, including modern slavery and human rights abuse.

While no supplier reports were received in 2025, we acknowledge that awareness and trust in such mechanisms takes time to build. To increase visibility and encourage use, the service was actively promoted through our refreshed Supplier Code of Conduct, the supplier portal (Ivalua), and the new supplier webpage on Air New Zealand's website.

Alongside this, Air New Zealand developed new procedures for investigating and responding to supplier reports. These align with the approach already applied to employee concerns and are guided by principles of impartiality, confidentiality, non-retaliation, accessibility, fairness, timeliness, remedy, and continuous improvement. This ensures suppliers and their workers can raise issues with confidence that they will be addressed respectfully and without reprisal.

The Supplier Code of Conduct also requires suppliers to maintain their own credible grievance channels. We encourage use of these in the first instance, but serious concerns, such as modern slavery, may be raised directly with Air New Zealand, including through Speak Up. Over time, we expect the service will help to strengthen our ability to identify risks earlier and support prevention and remediation efforts.

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Air New Zealand operates within a complex global risk environment. While risks cannot be entirely eliminated, they can be managed and mitigated through structured governance.

Since 2022, Air New Zealand's Board has formally defined and reviewed the airline's Risk Appetite, providing clear guidance on the types and levels of risk the organisation is prepared to accept. Modern slavery sits within the Supply Chain risk dimension, where the Board has adopted an averse risk appetite – reflecting our commitment to avoiding any contribution towards modern slavery or human trafficking.

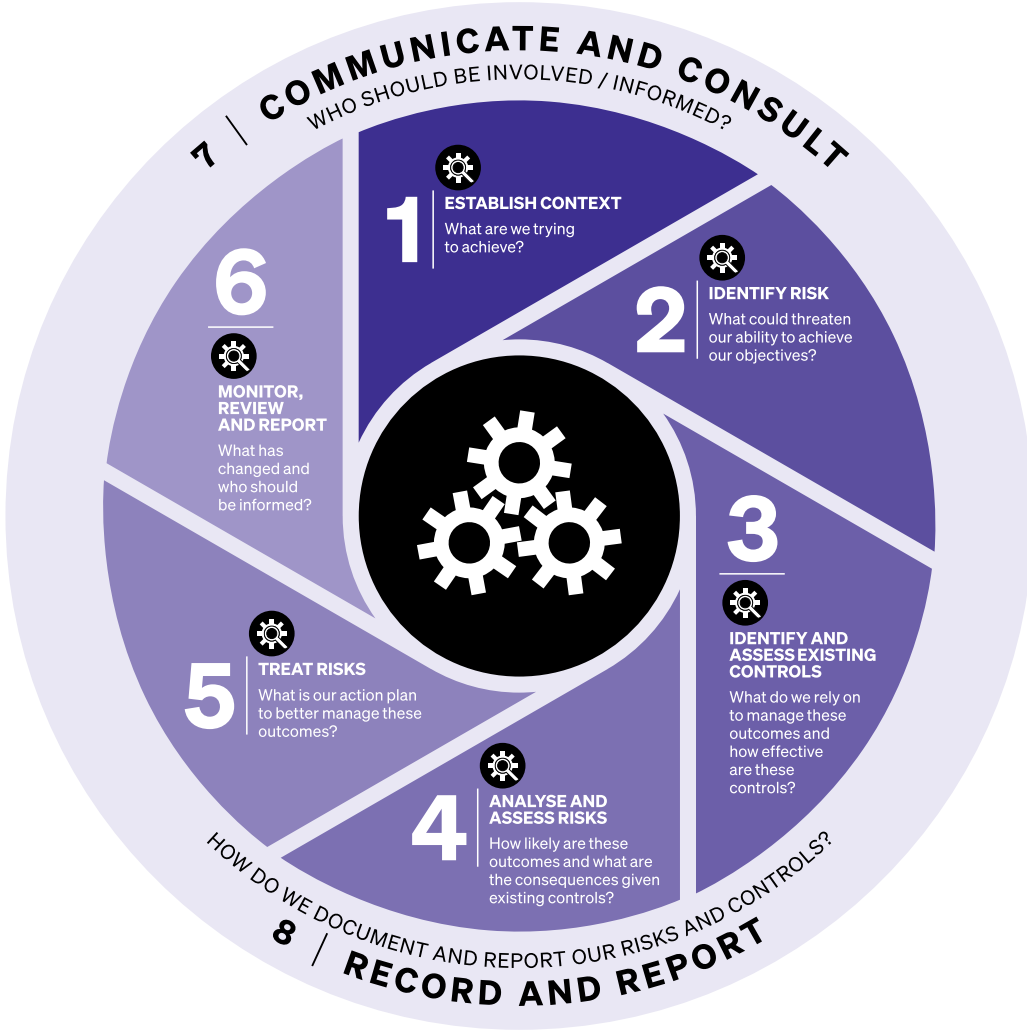
The Board expects the Risk Appetite to be considered in all matters presented to it and will continue to review the Risk Appetite Statement to ensure it remains responsive to changes in the airline's top strategic risks and the Board's appetite for risk. Air New Zealand's Enterprise Risk Management Framework provides a Group-wide approach to managing these risks and assessing the effectiveness of our controls to manage these in line with our Risk Appetite.

Tracking the effectiveness of actions to address modern slavery and human trafficking is inherently complex. Nevertheless, Air New Zealand continues to regularly assess the effectiveness of its controls through the Enterprise Risk Management Framework.

In 2025, we identified several priority actions to further enhance our approach, with progress outlined in the next section.

Assessing our effectiveness

AIR NEW ZEALAND'S RISK MANAGEMENT PROCESS



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Progress Against our Commitments

In our 2024 statement, Air New Zealand highlighted several key initiatives we sought to progress during 2025 to strengthen our approach to addressing modern slavery. Updates are summarised in the following table.

2025 Initiatives	Progress in 2025	Status
Establish a Modern Slavery Working Group	A cross-functional working group was established with representatives from the Legal, People, Procurement, Sustainability, Resilience, and Risk & Compliance teams. Terms of Reference were agreed, and the group convened its first meeting in 2025. From 2026, the group will meet quarterly to oversee implementation and alignment.	✓
Develop an enhanced modern slavery supplier due diligence framework	A draft Responsible Sourcing Due Diligence procedure was developed, including benchmarking acceptable third-party social practice schemes. Final approval and implementation are expected in early 2026.	◔
Design and roll-out due diligence for high-risk suppliers	Engagement began with suppliers assessed as inherently higher risk, using Fair Supply and Sedex to gather detailed supplier-specific data before determining any further due diligence needs. Mandatory audits are embedded for key categories with responsible sourcing position statements (e.g. SAF, palm oil, and voluntary nature-based carbon removals). This process is embedded into the new Responsible Sourcing Due Diligence procedure and will continue into 2026.	✓
Develop training for high-risk category teams	Targeted training was delivered to the Procurement and Legal teams on the refreshed Supplier Code of Conduct, including how to communicate expectations around modern slavery risk management. The Supplier Code of Conduct is also integrated into e-learning modules. Some teams received ad hoc category-level guidance; however, the development of formal category-specific training was deferred to 2026. This sequencing ensures training will be aligned with the new due diligence procedures.	◔
Develop grievance and investigation procedures	A standard operating procedure was finalised to guide how Air New Zealand responds to supplier Speak Up reports, ensuring concerns are handled fairly and responsibly. A draft Responsible Sourcing Due Diligence Framework was also prepared, including monitoring, escalation and reporting processes, with approval expected in early 2026.	✓
Participate in the Modern Slavery Aviation Forum	Air New Zealand continued participation alongside Virgin Australia and Qantas. The group met three times, including with Australia's Anti-Slavery Commissioner. The forum remains a trusted space for collaboration, knowledge sharing, and aligning industry approaches to managing modern slavery risks. Participation will continue in 2026.	✓

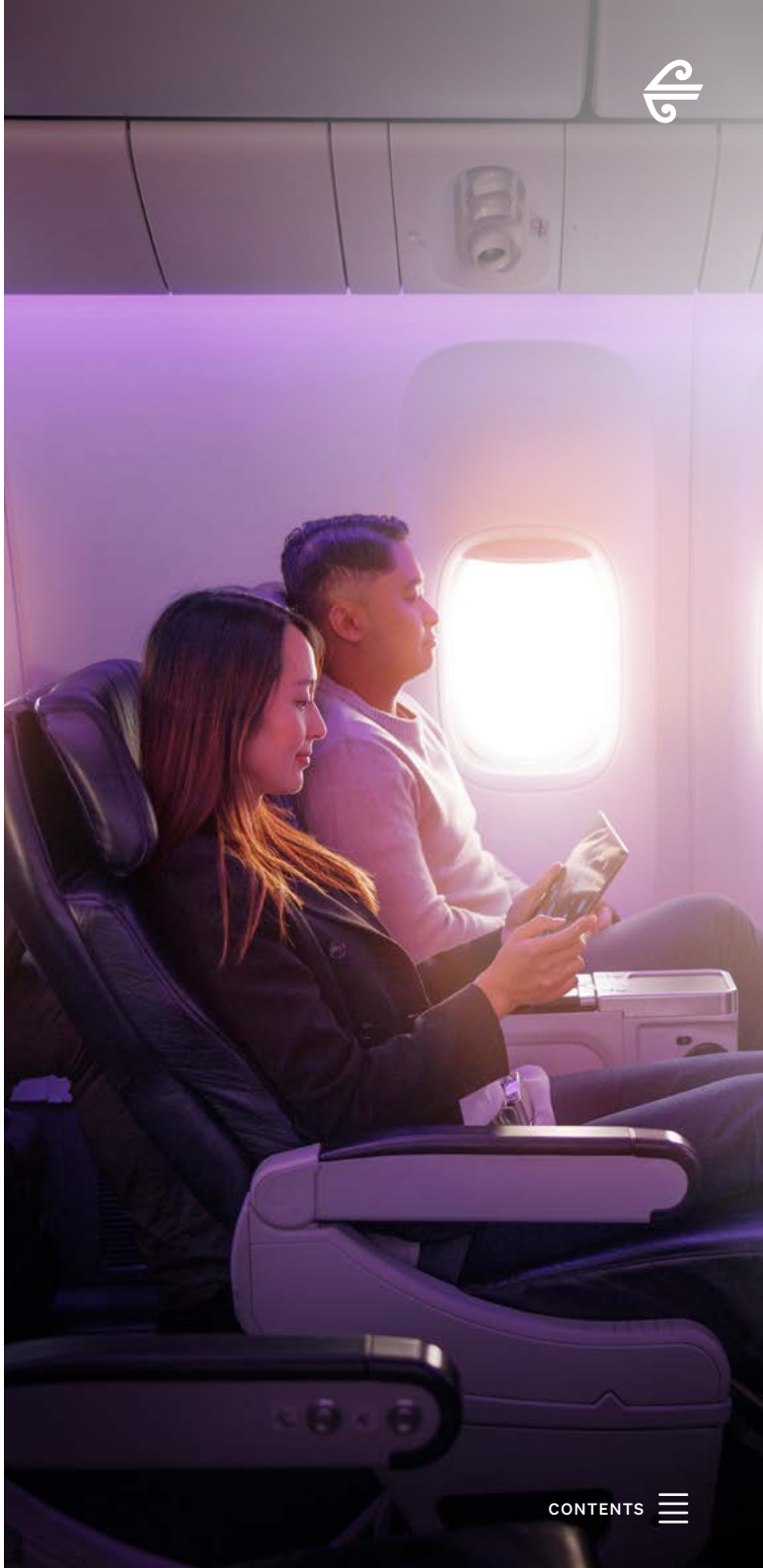
✓ Complete ◔ In progress ✗ Not progressed

In 2026, Air New Zealand will focus on embedding the systems and frameworks developed in 2025 and scale the impact of our modern slavery programme across our operations and supply chains.

2026 Initiatives	KPIs
Embed governance through quarterly Modern Slavery Working Group meetings and progress tracking	– Minimum of four meetings held – Roadmap developed and maintained to track progress across the business
Finalise and roll out the Responsible Sourcing Due Diligence procedure	– Procedure approved by senior leadership – Training delivered to all relevant teams
Expand supplier-specific risk assessments, including audits where required	– Percentage of higher-risk suppliers assessed with supplier-specific data (via SAQ or audit) – Corrective actions implemented in response to identified non-conformances
Deliver targeted, category-specific training aligned with new procedures	– Training developed and completed by relevant teams – Post-training feedback collected and used to refine future training
Continue active participation in the Modern Slavery Aviation Forum and the IATA Sustainable Procurement pilot	– Ongoing active participation in forums – Achievement of IATA Sustainable Procurement certification

The above summary table, and references throughout other parts of this Statement relating to planned measures for the next reporting period (i.e. our 2026 financial year), constitute future or forward-looking statements. Please refer to our disclaimer in Appendix 2 for important disclaimers about such forward-looking statements.

Looking Ahead to 2026



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Consultation across the Group and with its Entities

This Statement was developed by Air New Zealand's Sustainability team in consultation with key business functions that provided input into the Statement including Supply Chain, Procurement, Legal, Enterprise Risk, Resilience, and People teams.

These teams work collectively throughout the year as part of the Group's ongoing modern slavery and human trafficking risk management.

Prior to Board approval, the Statement was reviewed by the Company's General Counsel and Company Secretary, Chief Sustainability and Corporate Affairs Officer, Chief People Officer, Chief Operating Officer, and the directors of Air New Zealand Limited's controlled and owned entities. It was subsequently endorsed by the Chief Executive Officer, approved by the Air New Zealand Limited Board on behalf of Air New Zealand Group on 19 November 2025, and signed by the CEO and the Chair of Air New Zealand Limited.

Please feel free to contact us at sustainability@airnz.co.nz with any comments, queries or suggestions regarding our Statement. We welcome a dialogue on this important topic.

Appendix 1: Air New Zealand Subsidiaries

Name
Air Nelson Limited
Air New Zealand Aircraft Holdings Limited
Air New Zealand Associated Companies Limited
Air New Zealand Express Limited
Air New Zealand Regional Maintenance Limited
ANNZES Engines Christchurch Limited
Mount Cook Airline Limited
TEAL Insurance Limited
Air New Zealand (Australia) Pty Limited (incorporated in Australia)

Appendix 2: Forward Looking Statements Disclaimer

Any forward-looking statements in this Statement represent Air New Zealand's current intentions and reasonable expectations held at the date of this Statement. While Air New Zealand is committed to implementing the key initiatives we have identified in our future-looking statements, we acknowledge that circumstances may change, and our strategies may be adjusted accordingly.

Appendix

Appendix 3: Reporting Criteria

This table identifies where the disclosures required (or recommended) under the United Kingdom Modern Slavery Act 2015, Australian Modern Slavery Act 2018, and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act are addressed within this Statement.

Reporting Criteria	Australian Modern Slavery Act 2018	United Kingdom Modern Slavery Act 2015 (not prescriptive, but recommended to include)	Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act	2025 Air New Zealand Modern Slavery Statement page reference
1. Structure, operations, activities and supply chains	s16(1)(a), (b), (f)(i) and (f)(ii) identify the reporting entity, describe its structure, operations and supply chains, and outline consultation processes with entities it owns or controls	s54(5)(a) its structure, business and supply chains	Part 2, s11(3)(a) its structure, activities and supply chains	4, 7-8, 11, 20-21
2. Policies	s16(1)(d) actions taken to assess and address risks, including due diligence and remediation processes	s54(b)(5)(b) policies in relation to slavery and human trafficking	Part 2, s11(3)(b) policies and due diligence processes in relation to forced labour and child labour	6, 9-10, 13-14, 16
3. Risk management processes to assess and address risks	s16(1)(c) risks of modern slavery practices in operations and supply chains	s54(d)(5)(d) the parts of its business and supply chains where there is a risk of slavery or human trafficking, and steps taken to assess and manage that risk	Part 2, s11(3)(c) the parts of its business and supply chains that carry risk of forced labour or child labour, and the steps taken to assess and manage that risk	8-19
4. Due diligence and remediation processes	s16(1)(d) actions taken to assess and address those risks, including due diligence and remediation processes	s54(c)(5)(c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains	Part 2, s11(3)(d) and (e) measures to remediate forced labour or child labour, and measures to mitigate income loss to vulnerable families from remediation measures	8-19
5. Training	s16(1)(d) actions taken to assess and address those risks, including due diligence and remediation processes	s54(f)(5)(f) training about slavery and human trafficking available to staff	Part 2, s11(3)(f) training provided to employees on forced labour and child labour	9-10, 16, 18-19
6. Effectiveness assessment	s16(1)(e) describe how the reporting entity assesses the effectiveness of actions	s54(e)(5)(e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against performance indicators as it considers appropriate	Part 2, s11(3)(g) how the entity assesses its effectiveness in ensuring forced labour and child labour are not used in its business and supply chains.	17-18
7. Any other information	s16(1)(g) any other relevant information	No specific equivalent	No specific equivalent	-
8. Approval of the report	s16(2)(a) details of approval by the principal governing body of the reporting entity	s54(6) statement must be approved by the Board and signed by a director	Part 2, s11(5) approval of the report must be evidenced by a statement that it was approved by the governing body and a signature of one or more members of the governing body	3-4, 20

Appendix

AIR NEW ZEALAND

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STAR ALLIANCE