

Modern Slavery and Human Trafficking Statement

For the financial year ending 31 December 2026

1. Introduction

This statement by Onboard Retail Ireland Limited (“the Company”) is made pursuant to section 54 of the UK Modern Slavery Act 2015. It details steps the Company has taken (or will take) during the 2026 financial year to prevent modern slavery and human trafficking in its business operations and supply chains. Although incorporated in March 2026, the Company recognises the importance of establishing robust systems and controls from the outset to prevent modern slavery and human trafficking in its business and supply chains.

The Company is committed to conducting business with integrity, transparency, and respect for human rights. Modern slavery is a crime and a violation of fundamental human rights. It encompasses slavery, servitude, forced or compulsory labour, and human trafficking.

This statement sets out the steps taken by the Company during its first period of trading to prevent modern slavery and outlines the measures it intends to implement as it develops its operations.

2. Organisation Structure, Business and Supply Chains

Onboard Retail Ireland Limited was incorporated on 27 March 2026 and is headquartered in Dublin, Ireland. It provides retail and wholesale services to its airline customers, operating in Ireland, Germany, and the United Kingdom.

The Company’s core activities include:

- Inflight retail services
- Product wholesale services
- New product development

The Company’s supply chain primarily includes:

- Professional services providers, logistics partners, contractors, distributors, and manufacturers
- Suppliers located in Europe

3. Policies in Relation to Modern Slavery

As a newly established entity, the Company is in the process of building and implementing its operational, compliance and procurement frameworks, including those relevant to responsible sourcing and human rights. The Company will maintain a zero-tolerance approach to modern slavery and has implemented (or will do so) policies that support this commitment, including:

- Code of Conduct – setting out expected ethical standards
- Supplier Code of Conduct – requiring suppliers to adhere to anti-slavery standards
- Whistleblowing Policy – enabling confidential reporting of concerns (in the interim, employees are expected to raise any concerns with management)
- Anti-Bribery and Corruption Policy

These policies are or will be reviewed regularly and communicated across the organisation.

4. Due Diligence Processes

Given its early stage operations, the Company will implement proportionate and scalable due diligence processes to identify, assess, and mitigate the risk of modern slavery, including:

- Supplier onboarding checks, including risk-based due diligence
- Contractual requirements obliging suppliers to comply with modern slavery laws
- Periodic supplier assessments and audits (where appropriate)
- Escalation procedures for any identified risks or incidents

The Company includes, and will continue to include, the following provisions in its supplier agreements:

- Obligations to comply with applicable laws and internationally recognised human rights standards
- Commitments to prohibit forced labour, child labour, and human trafficking
- A right for the Company to conduct audits of supplier compliance
- Rights to terminate contracts in the event of material breaches

These contractual controls form a key element of the Company's approach to managing risk in its supply chain.

5. Risk Assessment and Management

The Company will only work with suppliers who share its commitment to ethical standards and human rights. It recognises that modern slavery risks may be higher in certain areas of its operations and supply chains, such as:

- Suppliers in jurisdictions outside the EU where there may be weaker labour protections
- Suppliers who may use of temporary or contract labour

To manage these risks, the Company intends to:

- Conduct risk mapping exercises
- Prioritise high-risk suppliers for enhanced due diligence
- Work collaboratively with suppliers to improve standards where needed

6. Effectiveness and Key Performance Indicators

To measure the effectiveness of its actions, the Company will monitor:

- Number/percentage of suppliers subject to due diligence checks
- Completion rates of employee training
- Reported incidents and outcomes
- Supplier compliance with contractual obligations

The Company will continuously review and improve its processes to enhance effectiveness.

7. Training and Awareness

The Company will provide training to relevant employees to ensure they understand:

- What modern slavery is and how it can occur
- How to identify warning signs
- How to report concerns

Targeted training is provided to employees across the Company but particularly in finance, procurement, HR, and supply chain management, roles.

8. Reporting Concerns

Employees, suppliers and third parties will be encouraged to report any concerns through the Company's whistleblowing channels. All reports are taken seriously and investigated appropriately.

9. Future Steps

The Company is committed to continuous improvement and intends to take the following steps:

- Implement a whistleblowing policy and reporting mechanism in 2027
- Finalise and embed core compliance policies, including Code of Conduct and procurement standard
- Establish a formal modern slavery risk assessment framework
- Enhance supplier due diligence and monitoring processes
- Introduce training programmes for employees

10. Approval and Signature

This statement has been approved by the Board of Directors of Onboard Retail Ireland Limited.

Signed:



Name: **James Halsall**

Title: **Director**

Date: **03.07.2026**