

Modern Slavery and Human Trafficking Statement 2022

Published 13 June 2023

Introduction

At Edinburgh Airport we continue to have a zero-tolerance policy towards modern slavery and human trafficking. We remain committed to upholding and improving our practices to prevent these activities in our direct operations, our indirect operations and our supply chain as a whole.

At a glance

- We have an appropriate and well-communicated policy.
- We carry out due diligence activities based on risk assessment and follow-up.
- We provide good quality training and engagement.
- We have a strong emphasis on collaborative partnerships.
- We will continue to monitor our progress and report annually.

Throughout 2022, we have continued to implement and advance our sustainability strategy '[Greater Good](#)' highlighting Edinburgh Airport's commitment to playing its part in creating a sustainable future for our business, Scotland and the environment. The strategy is split into four key pillars, including the aim of being 'Scotland's Best Business'. This pillar demonstrates our ambition to create a trusted business and workplace that our community, partners, colleagues and passengers can be proud of. Our activity and reporting under the Modern Slavery Act support our objectives and targets under this pillar of our Greater Good strategy.



In November 2021 we introduced a new set of [values](#) throughout our business. The values were created by our employees through a series of workshops and other activities. They capture the character of Edinburgh Airport and guide us in all of our activities. Our ongoing activity to combat modern slavery and human trafficking demonstrates our 'Doing the right thing' and 'Caring about what we do' values, which are about leading by example, acting transparently to build trust, and being the best business we can be.



Working together



Providing a great service



Doing the right thing



Caring about what we do



Investing in our future

Edinburgh Airport's 2016 - 2022 Modern Slavery Statements can be found on our website [here](#).

Edinburgh Airport's 2020 – 2022 Modern Slavery Statements can be found on the UK Government Modern Slavery Registry [here](#).

1. Our business, structure and supply chain

Our business

Edinburgh Airport Limited is a private company registered in Scotland. We are owned by Global Infrastructure Partners (an infrastructure fund manager with around 80% ownership); Future Fund (Australia’s sovereign wealth fund); and Australian Retirement Trust (an Australian state pension fund).

Edinburgh Airport is Scotland’s busiest airport with 11.3 million passengers passing through its terminal in 2022 and it makes a significant contribution to the economic, cultural and social wellbeing of the city of Edinburgh and Scotland.

The Covid -19 global pandemic caused disruption on an unprecedented scale for Edinburgh Airport and the wider aviation industry, however the recovery from the pandemic is now well underway and in 2022 Edinburgh Airport delivered its first full summer season with no travel restrictions since 2019. Edinburgh Airport experienced a strong overall recovery in passenger traffic in 2022, with international traffic surpassing 2019 levels in certain months.

A number of new destinations have been added to Edinburgh Airport’s route network, strengthening its short-haul and long-haul portfolio. Transatlantic traffic was particularly strong in 2022 and new routes have been added for 2023 to both Atlanta with Delta, and Calgary with WestJet.

Edinburgh Airport is one of the main routes in and out of Scotland and as such we can help combat slavery and human trafficking activity.

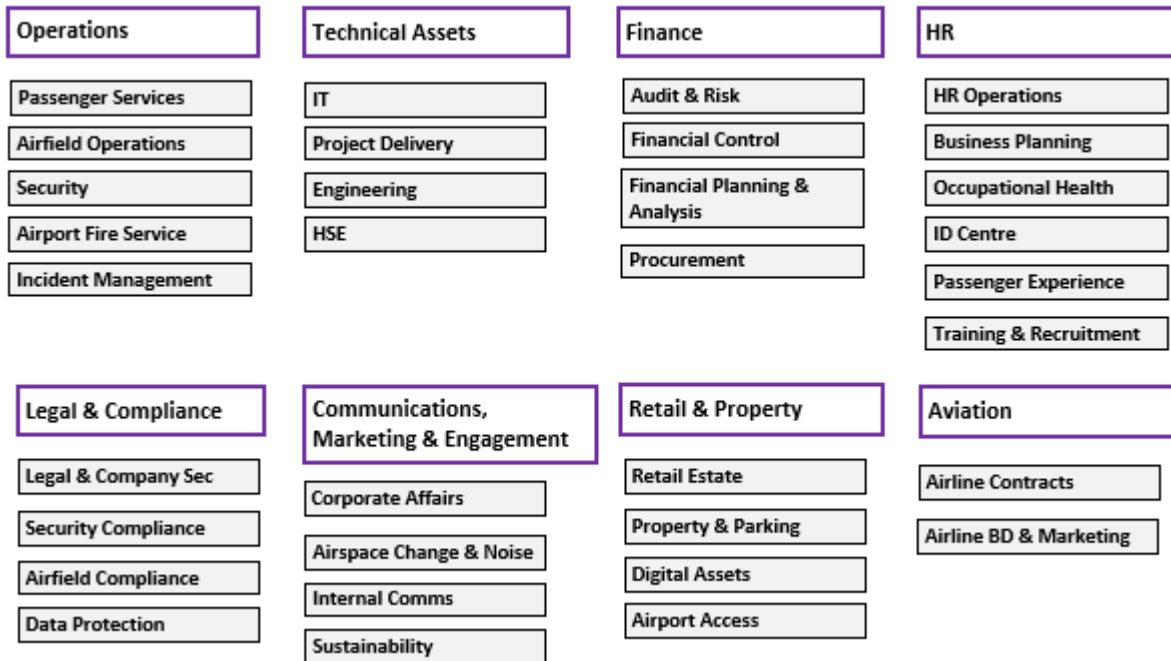
Our business consists of various operational and commercial activities, as shown below:



Our Annual Report for 2021 and Half-Year report for 2022 contain more information about our operational activity and can be found on the investor relations section of our website [here](#).

Our structure

Our departmental structure remains as it was during 2021 and is shown below.



It remains the case that the majority of our modern slavery compliance and prevention activity takes place across our Operations, Procurement, HR and Legal teams.

Our supply chain

Our general products and services supply chain consists of around 1400 suppliers most of which are located in the UK and have to publish their own modern slavery statements. The majority of our services are sourced from the UK, with purchased goods predominately originating from Europe.

Types of services (including third party services) procured:

- support and maintenance for assets
- consultancy
- design and software

Types of goods purchased:

- vehicles
- assets
- parts and spares
- hardware
- uniforms
- typical business consumables

Our project delivery supply chain consists of around 40 IT and construction suppliers, mostly based in the **UK** and delivering a range of asset and infrastructure projects ranging in their size and complexity. As a result of Covid-19, the number of material projects undertaken in 2020 and 2021 dropped significantly from around 75 in 2019 to less than 15 in 2020 and around 30 in 2021. However, we have now seen this increase again with 83 material projects being worked on in 2022.

2. Our policies in relation to slavery and human trafficking

Corporate Policy

We have a published Anti-Slavery and Human Trafficking Policy on our website [here](#).

3. Our due diligence processes in relation to slavery and human trafficking

Doing business with us

Businesses tendering for airport contracts must respond to pre-qualification questions, including on Modern Slavery Act compliance. Our procurement team carries out a review of all such businesses and will consider the level of risk with regard to modern slavery compliance and for any businesses which are considered high risk (considering the context in which the supplier operates, the nature of workforce and the commodity type), more detailed assessments will take place before the supplier is permitted to do business with us.

Our supplier onboarding process sets out a range of safety, environmental, sustainability and operational requirements and conditions which our suppliers must adhere to. In terms of combatting slavery and human trafficking, our supplier onboard pack requires suppliers to:

- Comply with slavery and human trafficking regulation.
- Have in place and ensure its compliance with, its own modern slavery compliance policies.
- Provide copies of those policies.
- Or, comply with the airport's Anti-Slavery and Human Trafficking Policy.

Suppliers that have not been active for over 12 months must re-submit a Supplier Onboard Pack to the airport, including re-certifying their compliance with the airport's modern slavery and human trafficking policies, and the law in this area.

Our standard supply contract wording includes conditions that suppliers comply with modern slavery and human trafficking regulations and report any instances of modern slavery or human trafficking identified. Suppliers in breach of these conditions may face termination of their contract.

During 2022 we implemented, as part of our Greater Good Strategy, a Supplier Sustainability Pledge. You can find more information [here](#).

Around 92% of *new* suppliers in 2022 have signed this Pledge. By signing the Pledge, we are asking our suppliers to demonstrate their commitment to our sustainability and CSR values. Suppliers who sign are pledging that:

- They will engage labour on a voluntary, fair and safe basis and pay at least the Real Living Wage.
- Child labour, forced labour and illegal labour are strictly prohibited.
- They will respect employees' rights to associate freely and negotiate collectively.
- They will encourage and enable employees to report concerns of illegal or unethical activities.

Our procurement team are in the process of reviewing each *existing* supplier to consider whether they are deemed a higher risk in this area, whether they have their own sustainability and CSR strategy, or where relevant to apply our Pledge. As a result of this activity we had around 38% of relevant existing suppliers signed up to our Pledge in 2022, and hope to have another 15% of relevant existing suppliers sign up to our Pledge in 2023.

Recruitment and vetting

All airport employees and most of our on-site business partner employees are background checked in line with aviation security regulation. This includes employment referencing and identity verification, as well as right to work checks. These measures are a robust and effective mitigation against the risk of modern slavery amongst our own employees, and those of our business partners who require an airport ID pass to access our facilities.

Employee reporting and concerns

As well as day-to-day line management reporting, we have clear code of conduct and reporting policies, and an external helpline for employees and business partners to report concerns in any area of our business, including relating to modern slavery or human trafficking. A number of our employees are members of unions and the airport prides itself on an open, collaborative and transparent relationship with its unions.

Working with our security partners

Teams across the business work closely with our partners in Police Scotland and Border Force. This includes collaborating on modern slavery and human trafficking matters and intelligence.

The airport runs risk and security advisory groups with our security partners and other operators with the aim of identifying and mitigating airport security issues and other threats. Modern slavery and human trafficking risk was introduced as a standing item on the airport risk advisory group's risk register in 2017, which ensures it is periodically reviewed in this forum.

Our partners in Border Force and Police Scotland carry out their own anti-slavery and human trafficking activities each year through their own organisational structure and programmes. At Edinburgh Airport during 2022, these have included:

- Scottish intelligence updates from the National Human Trafficking Unit.
- Identifying 'at risk' passengers and flights and carrying out safeguarding interventions.
- Carrying out joint human trafficking prevention operations.
- Undertaking [Project Servator](#) deployments in the airport.
- Responding to specific human trafficking enquiries from with their respective organisations.
- Undertaking 'Operation Fawnlid' aimed at identifying and safeguarding potential victims of trafficking at the airport.

During 2022, our business identified the war in Ukraine as a high-risk factor which could contribute to human trafficking to Scotland. Our Operations team engaged with a local volunteer organisation who became stationed within the airport to assist Ukrainians and work together to put in place processes for volunteers to raise concerns directly with Operations on site.

4. Where is the risk of Modern Slavery and Human Trafficking in our business?

We agree with the conclusion from the Slave-Free-Alliance Gap Analysis Report that was carried out in 2021 (see Section 6 below) that the greatest exposure to modern slavery in our business exists in our supply chain – both in terms of procurement of products and services, and contracting for infrastructure projects.

We also recognise that we are an important gateway to and from Scotland, and have the ability to work with our security partners (Border Force and Police Scotland) to help prevent the airport being used by human traffickers.

How we assess and manage the risk

Our current activity and continuous improvement measures in these areas are detailed in Sections 2, 3 and 6.

5. Training and Engagement

The airport's online Modern Slavery and Human Trafficking training course is made available to its employees and new joiners, and is a 2-yearly requirement for all employees. This provides a good level of awareness of modern slavery issues and the importance of tackling slavery and human trafficking.

Our Legal Team agrees a Modern Slavery Action Plan annually with department heads from our Procurement, HR, Projects and Operations teams to help steer mitigation and compliance activity in each area.

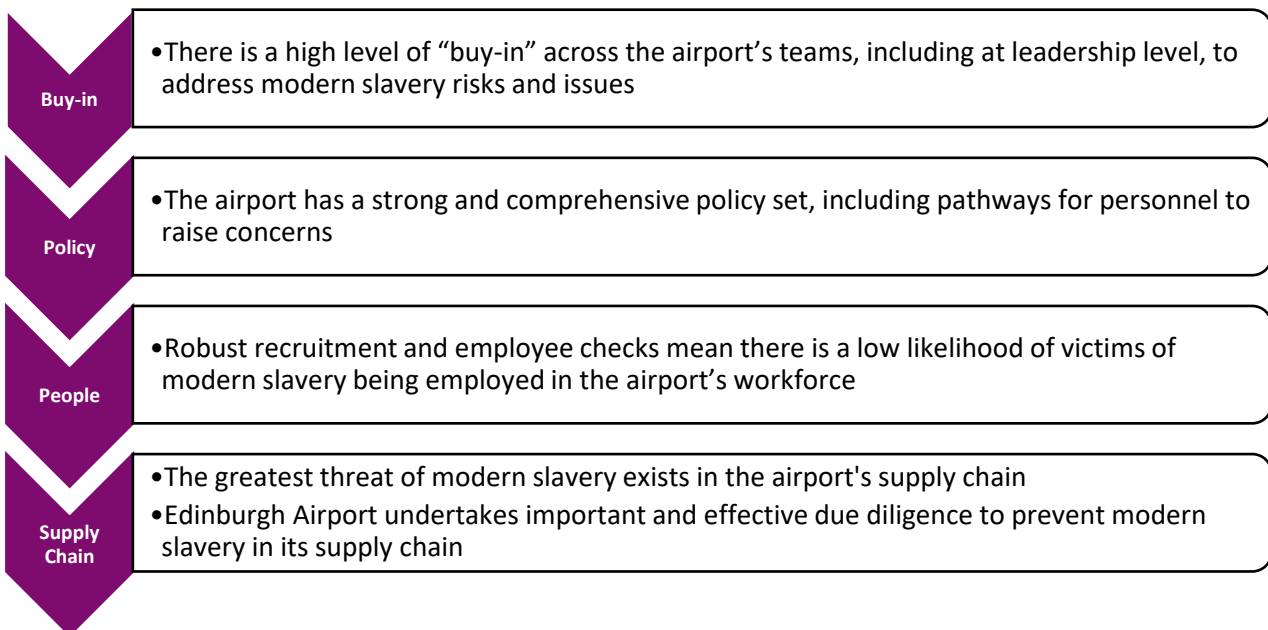
Our Legal and Compliance team gives training to all security officers during their induction to the airport to promote awareness of modern slavery and human trafficking including what to look out for and how to raise concerns.

6. How effective are we?

We measure our effectiveness by reviewing the modern slavery prevention activity we planned to undertake in a year, against actual activity undertaken.

In May 2021 [Slave-Free-Alliance](#), an organisation set up by the [Hope for Justice](#) charity to work towards ensuring slave-free supply chains, carried out an external review and gap analysis of our modern slavery prevention measures. We continue to have ongoing dialogue with Slave Free Alliance who assisted us with training during 2022 and provide ongoing consultancy support.

The Slave-Free-Alliance Gap Analysis Report gave us a valuable independent assessment and provided confidence in our approach and activities. Its main conclusions were:



We believe these conclusions remain correct.

PROGRESS AGAINST OUR 2021 + 2022 ACTION PLAN

In 2021 we set ourselves a 2-year action plan for modern slavery activities to cover the period whilst our business returned to more normal trading conditions following the Covid pandemic. The actions are summarised in the tables below. We made good progress against the actions, completing them all during 2022.

MSA Statement Best Practice		
Update our Modern Slavery Statement format to align with Home Office guidance (6 reporting areas)		<i>Our 2021 and 2022 Statements followed the 6 reporting areas</i>
Publish our Modern Slavery Statements on the UK Government registry		<i>Our 2020, 2021 and 2022 Statements are published on the UKG registry</i>

MSA Policy & Procedure		
Update our Code of Conduct to include modern slavery awareness and reporting		<i>Updated May 2022</i>
Update our 'Speak Up' policy to promote the reporting of modern slavery concerns		<i>Updated May 2021</i>

Training & Engagement		
Make our online Modern Slavery course a two-yearly requirement		<i>Since June 2022, our online Modern Slavery course has been included in mandatory training that all employees are required to complete every two years</i>
Improve employee awareness through internal communications campaigns		<i>Awareness comms published in May, June, July, August and October 2021, including during Modern Slavery Awareness week; and in May, June and September 2022</i>
Provide additional training for Procurement and Project Management teams		<i>Training from Slave Free Alliance was given in December 2022</i>

Supply Chain & Project Delivery		
Carry out 'spot-checks' on one or more higher risk suppliers		<i>3 spot checks carried out during 2022</i>
Include modern slavery diligence in our construction tender pack		<i>Modern slavery questions included in Invitation to Tender docs since August 2021 and Corporate Social Responsibility / Sustainability questionnaire since March 2022</i>
Improve modern slavery awareness amongst airport Project Managers		<i>Project Managers attended a training course /workshop in December 2022</i>

Operations		
Enhance the sharing of modern slavery intelligence from our security partners		<i>Improved sharing through RAG reporting</i>
Look to carry out joint exercises, deployments, or training with our security partners		<i>Servator deployments were carried out in 2022, together with Operation Fawnlid</i>

2023 OBJECTIVES

We will maintain the airport's core modern slavery and human trafficking policy and procedure throughout 2023. We have set ourselves the following actions to achieve during 2023.

MSA Statement Best Practice
Continue to produce our Modern Slavery Statement in a format that aligns with Home Office guidance
Continue to publish our Modern Slavery Statements on the UK Government registry

Training & Engagement
Continue to train all employees on a two-yearly basis
Continue to improve employee awareness through internal communications and awareness activity
Provide role-specific enhanced training for new Procurement staff

Supply Chain & Project Delivery
Carry out 'spot-checks' on one or more higher risk suppliers
Continue to include modern slavery diligence in our construction tender pack
Prepare written guidance on assessment of a new suppliers using the principles of the UK Government's 2023 guide for commercial and procurement professionals
Increase the number of in scope existing suppliers that sign up to our Supplier Sustainability Pledge by 15%

Operations
Continue to share modern slavery intelligence with our security partners
Carry out joint exercises, deployments, or training with our security partners where possible
Assist volunteer groups who are active within the Airport terminal with the aim of supporting passengers who are considered high risk for modern slavery or human trafficking

7. Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by Edinburgh Airport Limited's Board of Directors on 25 May 2023.



Gordon Dewar, Chief Executive
For and on behalf of Edinburgh Airport Limited
13 June 2023