

# **Modern Slavery and Human Trafficking Statement 2021**

Published 31 May 2022

## 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 are continuing to improve in identified action plan areas.

In June 2021 we launched 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 - 2021 Modern Slavery Statements can be found on our website [here](#).

Edinburgh Airport's 2020 – 2021 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 QSuper (an Australian state pension fund).

Edinburgh Airport was Scotland's busiest airport in 2019 and one of the fastest growing airports in the UK. In 2019 more than 37 airlines served over 220 routes and over 14.7 million passengers travelled through the airport.

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 2020 and Half-Year report for 2021 contain more information about our operational activity and can be found on the investor relations section of our website [here](#).

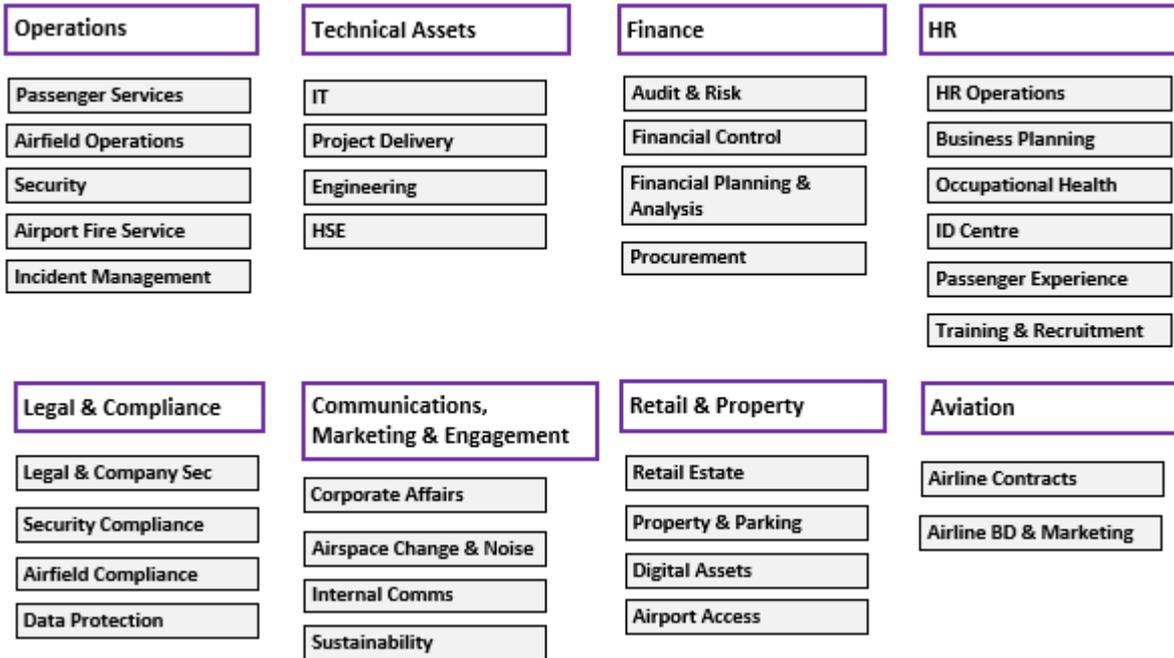
## COVID-19 impact

In 2021, UK airports’ businesses continued to be severely impacted by the COVID-19 pandemic. In Edinburgh Airport’s case we saw passenger levels at 20% of 2019 levels over the year as a whole, with activity levels under 5% of 2019 levels during the first half of 2021 when the UK entered its second lockdown with material restrictions placed on national and domestic travel. As a result, we continued with significant cost saving measures, including a material reduction in capital expenditure, and periods of employee furlough across the entire business.

**Our structure**

COVID cost saving measures saw us implement further changes to our business structure, including senior management redundancies. Changes from the structure contained in our 2020 Modern Slavery Statement are the movement of our HSE team from the Legal & Compliance area of our business to Technical Assets, and our Digital Assets and Parking teams moving to our Retail & Property team.

Our departmental structure 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 **850 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 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 currently being undertaken has dropped significantly from around 75 in 2019 to less than 15 in 2020 and around 30 in 2021.

## **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, and must supply copies of their policies and procedures or agree to comply with our policy.

Our supplier onboarding process sets out a range of safety, environmental, sustainability and operational requirements and conditions which our suppliers must adhere to. A copy of our Supplier Onboard Pack can be found on our website [here](#). In terms of combatting slavery and human trafficking, Section 13 of the Pack requires suppliers to:

- Comply with slavery and human trafficking regulation.
- Comply with the airport's Anti-Slavery and Human Trafficking Policy.
- Or, have in place their own modern slavery compliance policies.

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

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.

### ***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 act as 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 2021 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.

## **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 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 being made 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.

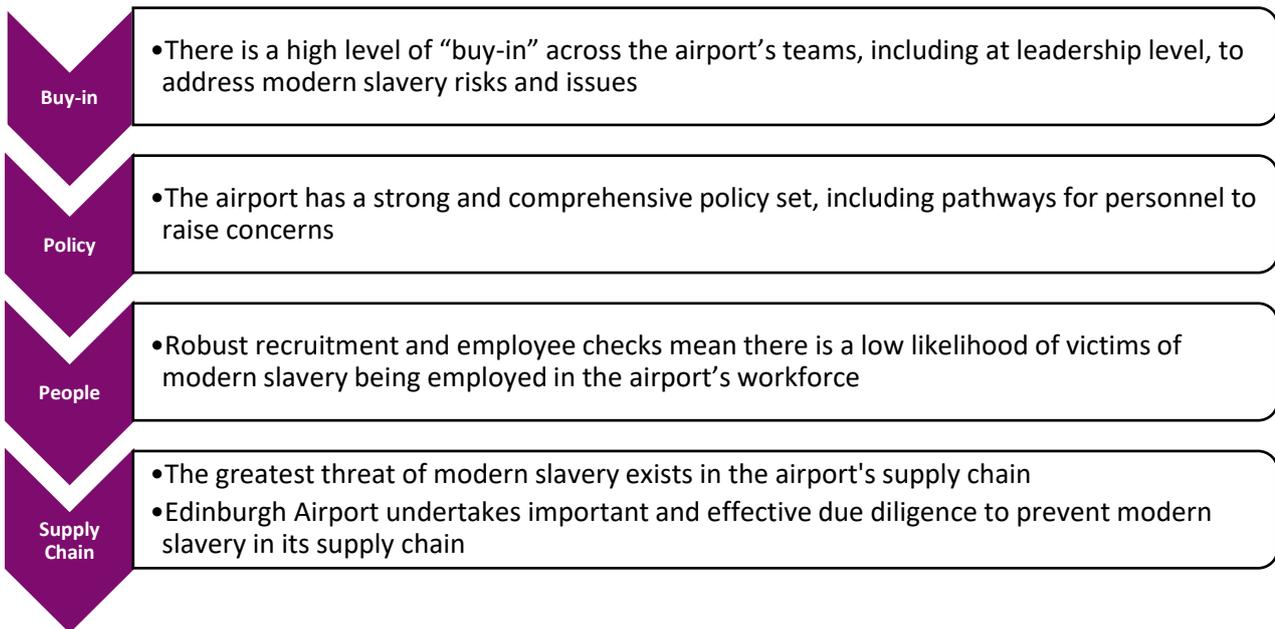
Our Legal & Compliance Director agrees a Modern Slavery Action Plan annually with department heads from our Procurement, HR, Projects and Operations teams to help steer mitigation and compliance activity in each area.

## 6. How effective are we?

In previous years we have measured 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.

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



## OUR 2021/22 ACTION PLAN

In 2021 we set ourselves a 2-year action plan for modern slavery activities to cover the period whilst our business returns to more normal trading conditions following the COVID pandemic. The actions are summarised in the tables below. We have made good progress against the actions and remain on track to continue and complete them during 2022.

MSA Statement Best Practice		
Update our Modern Slavery Statement format to align with Home Office guidance (6 reporting areas)		Our 2021 Statement now follows the 6 reporting areas
Publish our Modern Slavery Statements on the UK Government registry		Our 2020 and 2021 Statements are published on the UKG registry

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

Training & Engagement		
Make our online Modern Slavery course a two-yearly requirement		To be implemented in June 2022
Improve employee awareness through internal communications campaigns		Awareness comms published in June, July, August and October 2021, including during Modern Slavery Awareness week
Provide additional training for Procurement and Project Management teams		To be completed during 2022

Supply Chain & Project Delivery		
Carry out 'spot-checks' on one or more higher risk suppliers		2 spot checks carried out during 2021
Include modern slavery diligence in our construction tender pack		Modern slavery questions included in ITTs since August 2021, CSR questionnaire since March 2022
Improve modern slavery awareness amongst airport Project Managers		To be completed during 2022

Operations		
Enhance the sharing of modern slavery intelligence from our security partners		Improved sharing through RAG reporting - continue during 2022
Look to carry out joint exercises, deployments, or training with our security partners		Servator deployments were carried out in 2021 – we are planning joint deployments in 2022

We will also maintain the airport's core modern slavery and human trafficking policy and procedure throughout 2022 and increase the number of suppliers signed up to our Supplier Sustainability Pledge.

## 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 2021. It was approved by Edinburgh Airport Limited's Board of Directors on 12 May 2022.



**Gordon Dewar, Chief Executive**  
**For and on behalf of Edinburgh Airport Limited**  
**31 May 2022**