

Modern Slavery and Human Trafficking Statement 2020

Published 30 June 2021

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 combat slavery and human trafficking across the airport to prevent these activities in our direct operations, our indirect operations and our supply chain as a whole.

We have an appropriate and well-communicated policy; due diligence activities based on risk assessment and follow-up; good quality training and engagement; and a strong emphasis on collaborative partnerships.

Edinburgh Airport's 2016 - 2019 Modern Slavery Statements can be found on our website [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:



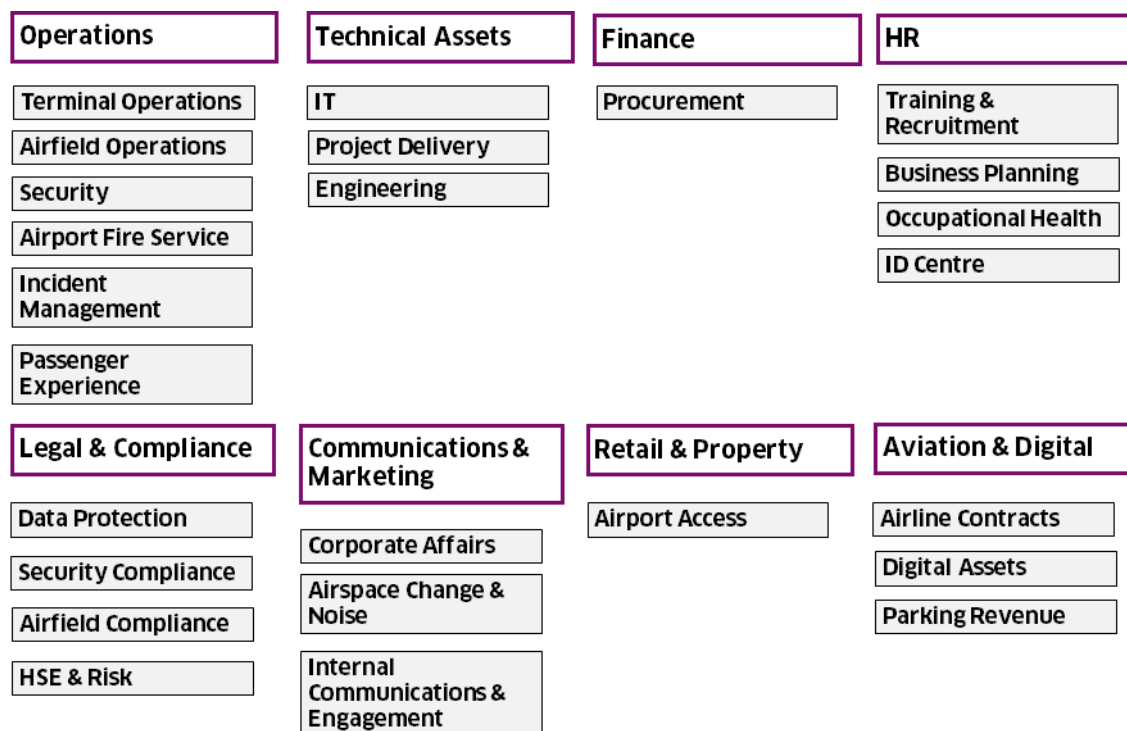
Our Annual Report for 2019 and Half-Year report for 2020 contain more information about our operational activity and can be found on the investor relations section of our website [here](#).

In 2020, UK airports’ businesses were severely impacted by the COVID-19 pandemic. In Edinburgh Airport’s case we saw passenger levels drop by 76% over the year as a whole, with sustained periods where activity levels were less than 2%. As a result, we undertook significant cost saving measures including a redundancy exercise and periods OF employee furlough across the entire business.

We also carried out a business reorganisation as part of our operational response to COVID. Material changes from the structure contained in our 2019 Modern Slavery Statement include our Engineering, IT and Project Delivery teams moving under a new Technical Assets Department; our Business Planning team joining HR; and certain compliance teams (Security, Airfield and HSE) joining the Legal team to create a new Legal & Compliance Department.

Our structure

Our departmental structure as at 31 December 2020 is shown below.



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

Our supply chain

Our 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. The type of services we procure are: support and maintenance for assets, consultancy, design and software. The goods we purchase fall into the following categories: vehicles, assets, parts and spares, hardware, uniforms and other 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 for us ranging in their size and complexity. As a result of COVID, the number of material projects currently being undertaken has dropped significantly from around 75 in 2019 to less than 15 in 2020.

2. 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 (see Section 5 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.

Our current activity and continuous improvement measures in these areas are detailed in Sections 3 and 5 below.

3. Our Policies, Procedures and Prevention Measures

Corporate Policy

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

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 modern slavery compliance conditions and expectations which our suppliers must adhere to. A copy of our Supplier Onboard Pack can be found on our website [here](#).

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.

Recruitment and vetting

All airport employees and most of our on-site business partner employees are background checked in line with aviation security regulation. Right to work checks and referencing also take place. 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 can include 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 risk advisory group's risk register in 2017, which ensures it is periodically reviewed in this forum. Any intelligence relating to slavery and trafficking would also be discussed in the airport's security forum, with significant concerns being raised to the airport's Legal & Compliance Director.

4. Training and Engagement

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

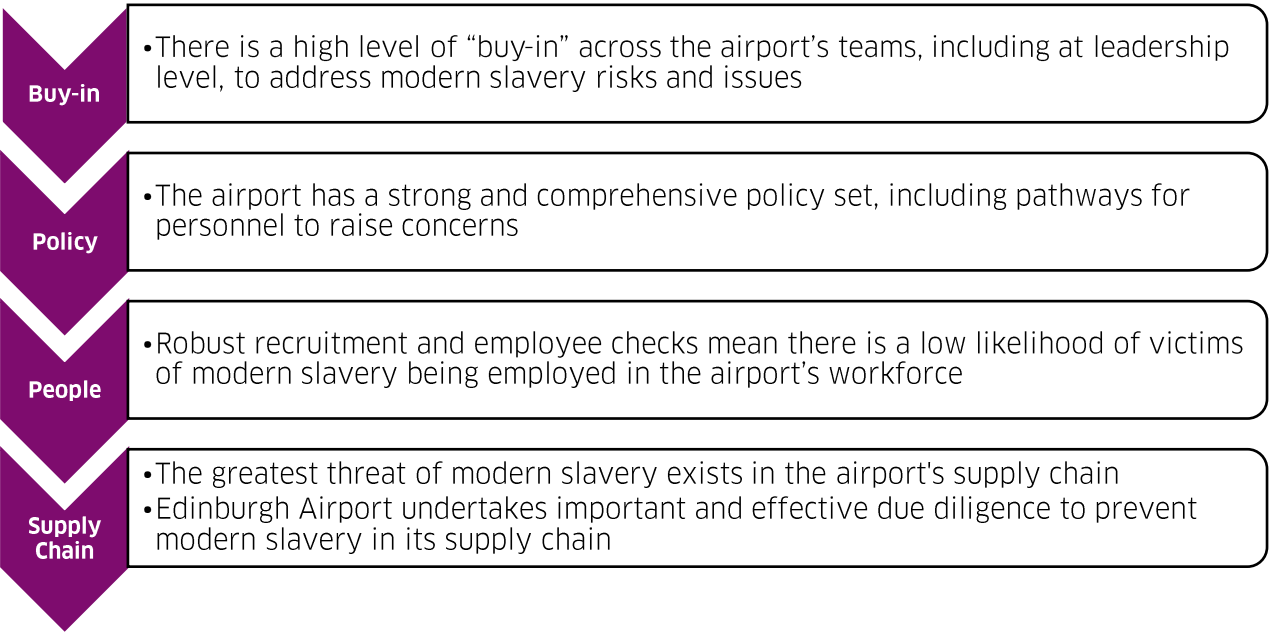
Our Legal & Compliance Director agrees a Modern Slavery Action Plan annually with department heads from our Procurement, HR and Operations teams to help steer mitigation and compliance activity in each area.

5. 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.

During 2020, the airport partnered with [Slave-Free-Alliance](#), an organisation set up by the [Hope for Justice](#) charity to work towards ensuring slave-free supply chains; and in May 2021 Slave-Free Alliance 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 are:



OUR 2021/22 ACTION PLAN

We will maintain the airport's core modern slavery and human trafficking policy and procedure throughout 2021 and 2022. We also plan to implement the following continuous improvement activities. These are recommendations from the Gap Analysis Report, or are otherwise based on the report content:

MSA Statement Best Practice	MSA Policy & Procedure	Training & Engagement	Supply Chain & Project Delivery	Operations
<ul style="list-style-type: none">• Update our Modern Slavery Statement format to more closely align with Home Office guidance (6 voluntary reporting areas)• Publish our Modern Slavery Statements on the UK Government registry	<ul style="list-style-type: none">• Update our Code of Conduct to include modern slavery as a reportable crime• Update our 'Speak Up' policy to promote the reporting of modern slavery concerns	<ul style="list-style-type: none">• Make our online Modern Slavery course a two-yearly requirement• Improve employee awareness through internal communications campaigns• Additional training for Procurement and Project Management teams	<ul style="list-style-type: none">• Carry out 'spot-checks' on one or more higher risk suppliers• Include modern slavery diligence in our construction tender pack• Improve modern slavery awareness amongst airport project managers	<ul style="list-style-type: none">• Enhance the sharing of modern slavery intelligence from our security partners• Look to carry out joint exercises, deployments or training with our security partners

Our aim is to implement these measures across 2021 / 2022 as our business returns to more normal trading conditions following the COVID pandemic.

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 2020. It was approved by Edinburgh Airport Limited's Board of Directors on 17 June 2021.



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