

Modern Slavery and Human Trafficking Statement 2023

Published 17 June 2024

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 2023, 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 supports 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 - 2023 Modern Slavery Statements can be found on our website [here](#).

Edinburgh Airport's 2020 – 2023 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. Throughout 2023 we were owned by a fund managed by Global Infrastructure Partners (an infrastructure fund manager). That fund owned around 80%, with Future Fund (Australia’s sovereign wealth fund) owning around 10% and the Australian Retirement Trust (an Australian state pension fund) owning around 10%. In April 2024 Vinci Airports and Global Infrastructure Partners announced a transaction where Vinci will acquire majority ownership of Edinburgh Airport Limited. This is expected to complete in Summer 2024. After completion Edinburgh Airport Limited will be owned by Vinci Airports and Global Infrastructure Partners, operating as a strategic partnership, with holdings of 50.01% and 49.99% respectively.

Edinburgh Airport is Scotland’s busiest airport with 14.4 million passengers passing through its terminal in 2023 and it makes a significant contribution to the economic, cultural and social wellbeing of the City of Edinburgh and Scotland.

Edinburgh Airport’s recovery following the Covid pandemic has continued to be strong with 2023 passenger numbers almost fully recovered to 2019 levels. Passenger volume recovery was particularly strong in the second half of 2023 where passenger numbers exceeded 2019 levels.

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 2023 with new routes added to both Atlanta with Delta, and Calgary with WestJet, plus Air Canada growing Toronto through frequency and aircraft size. Increased frequency to the East was added from Qatar Airways and Turkish Airlines, and Hainan Airlines returned its Beijing service to Edinburgh for the first time since Summer 2019.

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.

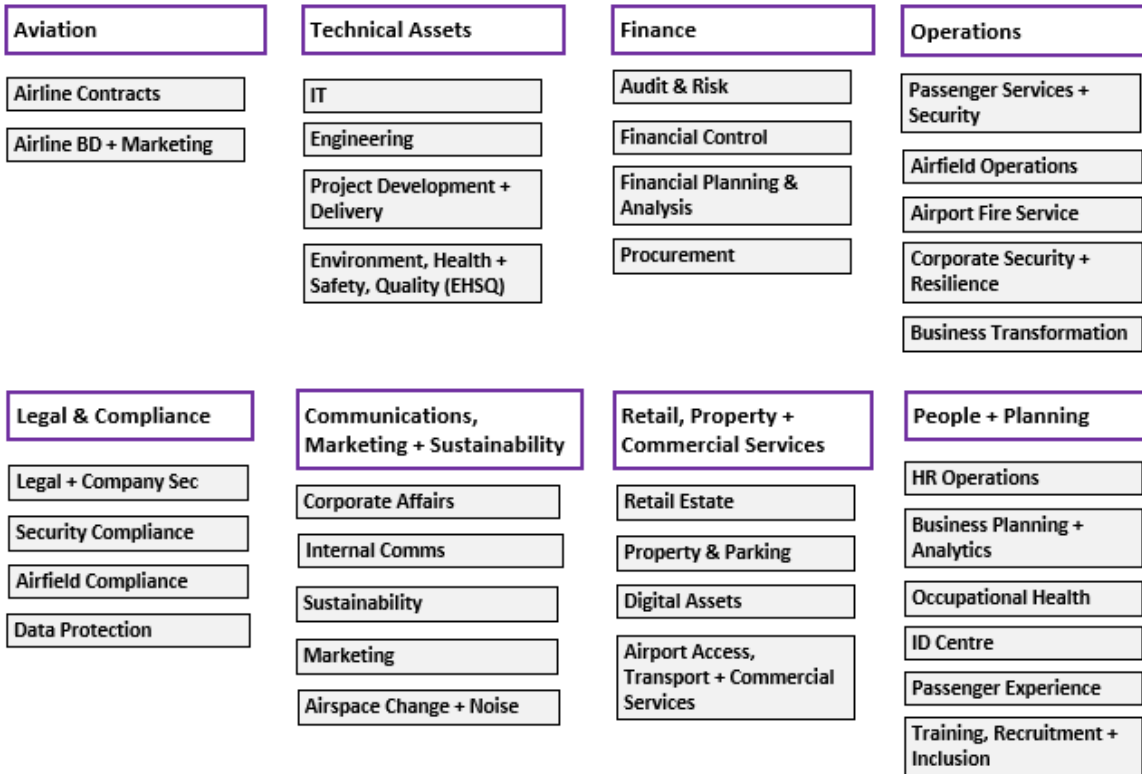
Our business consists of various operational and commercial activities, including those shown below:



Our Annual Report for 2022 and Half-Year report for 2023 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 remained broadly similar during 2023. The structure as at 31 December 2023 is shown below.



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

Our supply chain

Our general products and services supply chain consists of around 750 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. In 2022 we undertook around 83 material projects, and we had 72 material projects being worked on in 2023.

2. Our policies in relation to anti-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 anti-slavery and human trafficking

Doing business with us

Businesses tendering for airport contracts must respond to pre-qualification questions, including on compliance with anti-slavery and human trafficking regulation. Our Procurement team carries out a review of all such businesses and will consider the level of risk with regard to modern slavery compliance. 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 may 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 confirm that they:

- Comply with anti-slavery and human trafficking regulation.
- Have in place and ensure their compliance with their 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 anti-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 2023 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 sign our Pledge. As a result of this activity we had around 48% of relevant existing suppliers signed up to our Pledge in 2023, and we hope to have another 15% of relevant existing suppliers sign up to our Pledge in 2024.

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. A specific anti-slavery and human trafficking forum was created in 2023 with quarterly meetings planned for 2024 in order to discuss initiatives and/or any areas of concern.

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 context.

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 2023, 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.

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 were stationed within the airport during 2023 to assist Ukrainians and work together to put in place processes for volunteers to raise concerns directly with Operations on site. The volunteer organisation stopped operating its welcome desk at the end of 2023 but our Operations team remain in contact with the organisation and available to assist with future initiatives.

4. Where is the risk of modern slavery and human trafficking in our business?

We agree with the conclusion of the Slave-Free-Alliance Gap Analysis Report that was carried out in 2021 (see Section 6 below) that the greatest exposure to modern slavery and human trafficking 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, People and Planning, Projects and Operations teams to help steer mitigation and compliance activity in each area.

During discussions in 2023 between Legal, Operations and Procurement, a new initiative of creating a register of foreign languages spoken by onsite bilingual cleaning operatives was considered. This was actioned in 2023 and a register is now held by our Operations team who can request assistance from foreign language speakers including if discussing concerns of modern slavery or human trafficking with non-English speaking passengers.

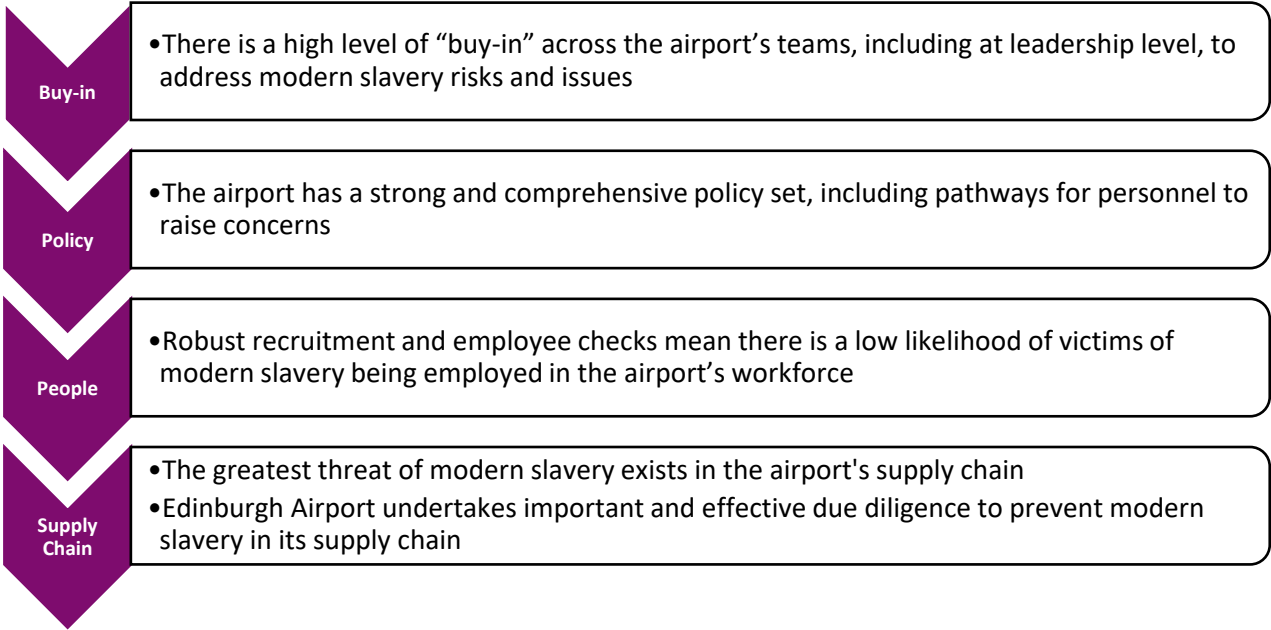
Our Legal and Compliance team gives training to all Security Officers during their induction at the airport to promote awareness of modern slavery and human trafficking including what to look out for and how to raise concerns. In 2024 we are looking to extend this training to staff of business partners in any identified high-risk areas.

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 have had ongoing dialogue with Slave Free Alliance during 2023 who assisted us with training.

The Slave-Free-Alliance Gap Analysis Report gave us a valuable independent assessment and provided confidence in our approach and activities. Its main conclusions are set out below, and we believe these conclusions remain correct.



2023 PROGRESS AND OBJECTIVES FOR 2024

In 2023 we set ourselves the modern slavery initiatives and actions summarised in the table below. We made good progress against the actions, completing the majority of them.

We will maintain the airport's core anti-slavery and human trafficking policy and procedure throughout 2024.

We have set ourselves the following initiatives and actions to achieve during 2024, some of which are a continuation of appropriate activities from 2023.

MSA Statement Best Practice		Progress against 2023 Actions	2024 Objective
Continue to produce our Modern Slavery Statement in a format that aligns with Home Office guidance		<i>Our 2021, 2022 and 2023 Statements followed the 6 reporting areas</i>	<i>Continuation</i>
Continue to publish our Modern Slavery Statements on the UK Government registry		<i>Our 2020, 2021, 2022 and 2023 Statements are published on the UKG registry</i>	<i>Continuation</i>

Training & Engagement		Progress against 2023	2024 Objective
Continue to train all employees on a two-yearly basis		<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>	<i>Continuation</i>
Continue to improve employee awareness through internal communications and awareness activity		<i>Awareness communications were published in June 2023, and in October 2023 on Anti-Slavery Day A specific Modern Slavery session was held during our airport wide Values week in November 2023</i>	<i>Continuation</i>
Provide role-specific enhanced training for new Procurement staff		<i>Training from Slave Free Alliance was arranged in 2023 and given in January 2024</i>	<i>Provide relevant training to staff of business partners operating on site in any identified high-risk areas</i>

Supply Chain & Project Delivery		Progress against 2023	2024 Objective
Carry out 'spot-checks' on one or more higher risk suppliers		<i>Two spot checks were carried out during 2023</i>	<i>Continuation</i>
Continue to 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>	<i>Continuation</i>
Prepare written guidance on assessment of new suppliers using the principles of the UK Government's 2023 guide for commercial and procurement professionals		<i>Updates have been made to the process of assessing suppliers with the creation of a standalone questionnaire on anti-slavery and human trafficking</i>	<i>Prepare written guidance for our procurement team to use to assist with their assessment of questionnaires completed by suppliers</i>
Increase the number of in scope existing suppliers that sign up to our Supplier Sustainability Pledge by 15%		<i>We increased the in scope existing suppliers that signed up to our Supplier Sustainability Pledge by 7% which was below our target however we have recruited more members of the relevant team who will add more focus to this task</i>	<i>Increase the number of in scope existing suppliers to sign up to our Supplier Sustainability Pledge by 15%</i>
Continue to engage with suppliers to discuss Modern Slavery	<i>N/A</i>	<i>N/A</i>	<i>Include Modern Slavery as a specific topic of discussion at 'Meet the Buyer' type of event to be attended by current and new suppliers</i>

Operations		Progress against 2023	2024 Objective
Continue to share modern slavery intelligence with our security partners		<i>A Modern Slavery forum has been set up with representatives from Police Scotland, Border Force, charity organisations and a Church of Scotland chaplain</i>	<i>Develop the Modern Slavery forum by meeting quarterly to share intelligence with our security partners and interested local partners</i>
Carry out joint exercises, deployments, or training with our security partners where possible		<i>Joint sessions have been held with Police Scotland and Border force</i>	<i>Continuation</i>
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		<i>Supported a volunteer group with a welcome desk to assist Ukrainians. Worked together to put in place processes for volunteers to raise concerns directly with Operations on site</i>	<i>Our Operations team to remain in contact with relevant local volunteer groups and offer assistance with future initiatives.</i>

7. Board approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by Edinburgh Airport Limited's Board of Directors on 15 May 2024.



Gordon Dewar, Chief Executive Officer
For and on behalf of Edinburgh Airport Limited
17 June 2024