ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

London City Airport Limited recognises that slavery and human trafficking remains a hidden blight on our global society and we are committed to improving our practices to combat slavery and human trafficking. As a key entry point into the United Kingdom, we recognise our responsibility in ensuring the prevention of human trafficking and modern day slavery through our premises and expect all who have, or seek to have a business relationship with us to familiarise themselves with and to act at all times in a way which is consistent with our anti-slavery values.

OUR BUSINESS AND STRUCTURE

We are an international airport based in London and operate in the highly regulated UK airport sector. We directly employ over 670 employees and our business is predominantly based in the United Kingdom. For a more detailed description of our business including our most recent balance sheet and details of our shareholders please refer to our latest Annual Return and Financial Statement (available at Companies House).

Our business activities span across a broad range of disciplines and sectors such as IT, finance, environment, health and safety, construction, human resources, corporate affairs, commercial, legal, passenger and cargo processing, security operations, airfield operations and engineering and we have an equally multi-disciplined supply chain to support us through the different aspects and provisions of our business.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have a zero-tolerance approach to modern slavery and are committed to ensuring that there is no modern day slavery or human trafficking in our business or supply chains. Our Anti-slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our commitment to anti-slavery is further demonstrated by the range of additional policies we implement in our business such as Whistleblowing, Anti-Bribery and Corruption, Purchasing and Ethics, general HR procedures and our employee Code of Conduct. These demonstrate our dedication to promoting a culture of identifying, reporting and acting on potential concerns as well as encouraging and codifying ethical practice.
We will not knowingly support or deal with any business involved in slavery or human trafficking and in addition to the above policies, we actively oblige companies we work with to take certain key steps to ensure they are in compliance with our anti-slavery and anti-human trafficking requirements as well as those detailed in the Modern Slavery Act 2015 through the implementation of contractual obligations in all new supply agreements.

SUPPLY CHAINS & BUSINESS PARTNERS

We have over 600 direct suppliers serving all areas of the airport including but not limited to professional and technical consultants, construction specialists, IT services providers, vendors of equipment, consumer retailers, suppliers of cleaning and catering and landscaper’s agriculture and waste management services.

We also have non-supply chain business partners such as our airlines and ground handlers. A large number of these suppliers, business partners and service providers will have turnovers which trigger a requirement to comply with the obligation to produce a Slavery and Human Trafficking Statement under the Modern Slavery Act 2015.

We are committed to anti-slavery and continue to implement the following measures:

- conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so as to further focus efforts on combating those areas;

- use reasonable endeavours to build business relationships with local suppliers;

- engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses; and

- where reasonably possible, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls against modern slavery and human trafficking.

TRAINING

As part of our commitment to ensuring a high level of understanding of the risks of modern slavery and human trafficking we have developed and rolled out training to all employees into Modern Slavery – Preventing Exploitation to educate them and raise awareness of potential risks in our supply chains.
FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business we have implemented a specific policy for inclusion in our existing business policies and shared it with all our staff, as well as our supply chain impressing upon them the need to adopt a similar policy.

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 2019.

Robert Sinclair - Chief Executive Officer
London City Airport Limited

Date: 26th March 2019    Review: 1st July 2019