

# Modern Slavery Statement

## Anti-Slavery and Human Trafficking

London City Airport Limited recognises that slavery and human trafficking remain a hidden blight on our global society. We are committed to improving our practices to combat them.

As a key entry point into the United Kingdom, we recognise our responsibility in ensuring we prevent human trafficking and modern-day slavery through our premises. We expect all who have or seek to have a business relationship with LCY to familiarise themselves with, and act at all times in a way consistent with, our anti-slavery values.

## Our Business and Structure

We are an international airport based in London, operating in the highly-regulated UK airport sector. We directly employ over 650 employees and our business is predominantly based in the UK. For a detailed description of our business, including our most recent balance sheet and shareholders details, please see our latest Annual Return and Financial Statement at Companies House.

Our business activities span a broad range of disciplines and sectors, including IT, finance, environment, health and safety, construction, human resources, corporate affairs, commercial, legal, passenger and cargo processing, security operations, airfield operations and engineering. We have an equally multidisciplinary supply chain to support us with the different aspects and provisions of our business.

## Our Policies on Modern Slavery and Human Trafficking

We have a zero-tolerance approach and are committed to ensuring there is no modern-day slavery or human trafficking in our business or supply chains. Our Anti-Slavery Policy Statement reflects our commitment to:

- Act ethically and with integrity in all our business relationships; and
- Implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our commitment is further demonstrated by the additional policies we implement including Whistleblowing, Anti-Bribery and Corruption, Purchasing and Ethics, general HR procedures and our employee Code of Conduct. These show 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. As well as the above policies, we implement contractual obligations in all new supply agreements to actively oblige companies we work with to take certain key steps to ensure they comply with our anti-slavery and anti-human trafficking requirements, as well as those in the Modern Slavery Act 2015.

#### Supply Chains and Business Partners

We have over 500 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 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:

- Continue to revise methods to conduct risk assessments to determine which parts of our and our suppliers' business are most at risk of modern slavery so we can focus more efforts on combating those areas;
- Use reasonable endeavours to build business relationships with local suppliers;
- Engage with our suppliers to convey our Modern Slavery Policy and gain an understanding of the measures they take to ensure modern slavery is not occurring in their businesses;
- Seek (where reasonably possible), to introduce supplier pre-screening (i.e. as part of our tender process) and supplier self-reporting on safeguarding controls against modern slavery and human trafficking; and
- Integrate anti-slavery clauses within all the contracts with our direct suppliers to ensure compliance.

#### Training

As part of our commitment to ensuring a high level of understanding of modern slavery and human trafficking, we roll out training to all employees in Modern Slavery – Preventing Exploitation to educate and raise awareness of potential risks in our supply chains, external customers and stakeholders.

Our Training and Compliance Security Team delivers awareness training to new employees, based on specific guidelines from IATA for the UK Aviation Industry on human trafficking.

### Further Steps

Whilst constantly reviewing the effectiveness of our internal measures to ensure there is no slavery or human trafficking in our business, we continue to update our policy as part of our existing business policies and continue to share it with all staff. We also share it with our supply chain to impress on 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 2023.



Wilma Allan – Interim Co- Chief Executive Officer and Chief Financial Officer, London City Airport Limited

Date: 1<sup>st</sup> January 2024

Review: 1 December 2024

