

Slavery and Human Trafficking Statement 2019

Published 29 June 2020

1. 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 and we continue to work together to prevent the airport being used by human traffickers and to avoid these activities in our direct operations, our indirect operations and our supply chain as a whole.

During 2019 activities included providing cards with helpline numbers to our retail outlets to increase the number of ‘eyes on the ground’, working with Border Force and Immigration Enforcement Officers regarding their annual information awareness event at the airport and improving crime detection and prevention at the airport through the implementation of Project Servator (described in Section 3 below).

We have also maintained our existing processes and procedures in place to mitigate the risks of human trafficking or slavery in our supply chains and business operations.

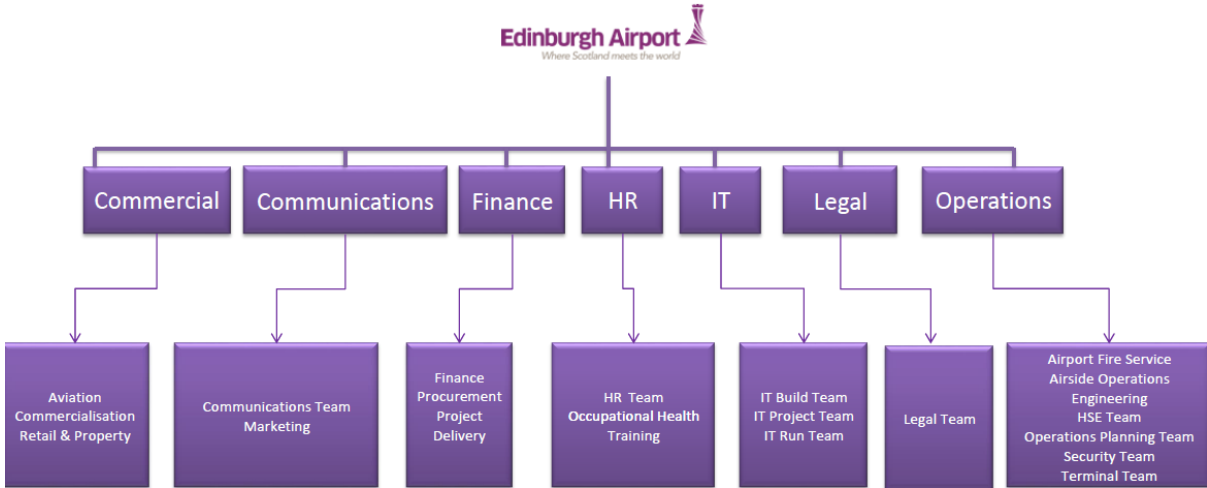
We have an appropriate and well-communicated policy; due diligence activities based on risk assessment and follow-up; good quality employee and business partner training; and a strong emphasis on collaborative partnerships.

Edinburgh Airport’s 2017 and 2018 Modern Slavery Statements can be found on our website.

2. OUR BUSINESS

Edinburgh Airport is a private limited company registered in Scotland. 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.

During 2019 there were no material changes to the structure of our business as shown in our 2018 Statement:



This structure has changed in 2020 as a result of the airport's operational response to the COVID-19 pandemic and the new structure will be shown in the 2020 Statement.

3. 2019 ACTIVITY

During 2019 the airport carried out a number of activities in line with those proposed in its 2018 Statement. These included:

- Ensuring modern slavery obligations remained in our Supplier Onboard Pack and in standard contracts and material new contracts;
- Re-certification of modern slavery and human trafficking compliance by suppliers that had not been active for over 12 months;
- Ensuring new suppliers have their own policies in place or apply the airport's policy;
- Carrying out a focussed verification of compliance exercise with material airport third party suppliers (e.g. cleaning services and car park management) to ensure modern slavery/human trafficking risks have been mitigated within their workforce;
- Keeping modern slavery as a standing item on the cross-airport Risk Advisory Group (RAG) and Joint Security Group (JSG);
- Implementing Project Servator, an airport-wide crime prevention programme designed to deter, detect and disrupt criminal activity at the airport;
- Carrying out joint airport and police deployments;
- Distributing cards to our retailers with helpline numbers to report modern slavery risk;
- Working with Border Force and Immigration Enforcement Officers on their annual modern slavery information day.

More details of these activities are contained in the following sections.

Activity involving Border Force and Immigration Enforcement Officers

During 2019, as part of an annual awareness event, a stand in the airport terminal was operated by a Border Force agent and an Immigration Enforcement Officer. The stand was stocked with leaflets and information and the aim was to raise awareness amongst passengers and the general public on tackling modern slavery and human trafficking issues, including at the airport.

Risk Advisory Group (RAG)

The RAG at the airport comprises of senior leaders from across the business and from its partners including the Scottish Police and UK Border Force. This group reports to the airport's Chief Operating Officer. The members of this group seek to identify and mitigate risks regarding airport security and other threats. Identifying the risk of victims of modern slavery or human trafficking travelling through the airport was introduced as a standing item on this group's risk register in 2017 and it continues to be so. The airport's activity in this area has been and will continue to be periodically reviewed and assessed in this forum.

Joint Security Group (JSG)

The JSG, established in 2018, is chaired by the airport and comprises multiple security and law enforcement partners. Any intelligence relating to slavery and trafficking is discussed in this forum and any significant concerns of the airport relating to slavery or trafficking issues are raised with the airport's Legal Director by the Security Compliance team.

Joint Policing Deployments

Throughout the month of June 2019, a series of joint deployments between Police and Airport Behavioural Detection Officers took place, increasing the likelihood of potential modern slavery or human trafficking activity being detected and investigated.

Project Servator

Project Servator is a UK-wide policing initiative designed to disrupt a range of criminal activity through highly visible and covert police deployments. During 2019 Servator was implemented within the airport to include an information awareness programme and deployments of specially trained mixed uniformed and plain clothed officers around the airport. These activities include by their nature the detection and disruption of potential modern slavery and human trafficking activity. The airport's Servator programme was positively assessed by the National Project Servator Team in August 2019.

Supply Chain

The airport's suppliers mainly consist of UK companies which have turnovers of a size requiring them to produce their own statements under the Modern Slavery Act 2015 (the Act).

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.

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. This reactivation requirement was implemented during 2019.

During 2019 our Procurement team evaluated or checked the existence of each new supplier's policy on Modern Slavery and Human Trafficking and where there was no such policy, the supplier was asked to agree to the airport's policy.

A focussed verification exercise was carried out with higher risk airport third party suppliers (e.g. cleaning services and car park management) to ensure modern slavery/ human trafficking risks were mitigated within their workforce. This activity did not raise any material concerns but was a useful awareness-raising exercise for our business partners.

HR Practices and Training

The airport has measures in place to check references provided by new employees. The airport's operational procedures to carry out identification, background and right to work checks seek to ensure that it does not hire any victims of modern slavery or human trafficking.

The airport's online Modern Slavery and Human Trafficking training course is made available to its employees, new joiners, business partners and suppliers, therefore spreading awareness amongst employees, business associates and suppliers about the importance of tackling slavery and human trafficking.

During 2019 cards with helpline numbers were distributed to retail outlets to raise awareness of potential incidents or occurrences of slavery or human trafficking and to provide helpline numbers for reporting these.

Policies and Supplier Contracts

The airport published its Anti-Slavery and Human Trafficking Policy in June 2017. The airport's standard supply contract wording includes a condition 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.

4. 2020 PLAN OF ACTION

The airport's principal modern slavery and human trafficking activities have evolved throughout 2017 – 2019. These will remain in place throughout 2020.

In 2020 the airport intends to partner with Slave-Free-Alliance, an organisation set up by the Hope for Justice charity to work towards ensuring slave-free supply chains. A gap analysis and benchmarking exercise using Slave-Free-Alliance's expertise and in-depth knowledge is proposed, which will inform the airport's next steps and actions.

COVID-19 Impact

Our work with Slave-Free-Alliance was originally scheduled for April and May 2020, however as a result of the COVID-19 pandemic the airport has operated throughout April, May and June 2020 with a skeleton operation and up to 80% of its staff furloughed. Our work with Slave-Free-Alliance will now start later in 2020 or into 2021 once we have a better understanding of how our business will re-start and re-grow. Our 2020 Modern Slavery Statement will provide an update in this area.

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. It was approved by Edinburgh Airport Limited's Board of Directors on 25 June 2020.



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