



SOP – MRS - Legal Anti-Slavery and Human Trafficking Policy

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Function: Legal Director

Authorised:
Date: December 2016

1. Amendments and Distribution

1.1 Amendments

Issue No	Issue Date	Comments / Changes
1	December 2016	First Issue

1.2 Distribution

Controlled Master Copy - Held by Legal Director

Contents:

1. Amendments & Distribution

2. Anti-Slavery and Human Trafficking Policy

- 1.0 Policy Statement
- 2.0 Responsibility for the Policy
- 3.0 Compliance with the Policy
- 4.0 Communication and Awareness
- 5.0 Breaches of this Policy

Anti-Slavery and Human Trafficking Policy

1.0 Policy Statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our own business or in our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our approach to tackling modern slavery in our business and throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our business processes we include systems and controls designed to prohibit and prevent slavery and human trafficking from occurring, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, suppliers, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2.0 Responsibility for the Policy

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- 2.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.3 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Edinburgh Airport's Legal Director.

3.0 Compliance with the Policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify an appropriate person as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You can notify:
 - your manager
 - the Airport Police
 - Border Force
 - Edinburgh Airport's confidential helpline (0800 915 1571)
 - The Modern Slavery Helpline (0800 0121 700)
 - The UK Human Trafficking Centre (0844 778 2406)

- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

4.0 Communication and Awareness

- 4.1 Edinburgh Airport will provide training on modern slavery and human trafficking issues, including indicators to help identify behaviour that could show that modern slavery or human trafficking is taking place.
- 4.2 Our zero-tolerance approach to addressing the issue of modern slavery in our business and supply chains should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5.0 Breaches of this Policy

- 5.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.