

Slavery and Human Trafficking Statement 2017

Published 8 June 2018

INTRODUCTION

At Edinburgh Airport we have a zero-tolerance policy towards modern slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business, and we actively work to prevent the airport being used by human traffickers.

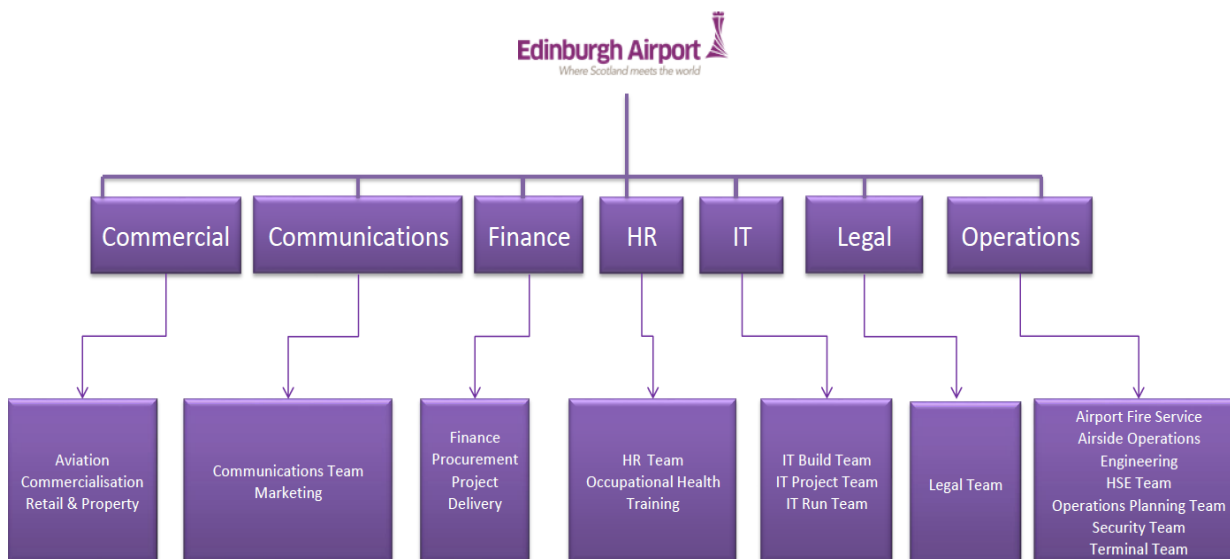
Edinburgh Airport's [2016 Modern Slavery Statement](#) can be found on our website.

During 2017 we increased the scope of our work on modern slavery and human trafficking, deepened our understanding of those risks in our business, and ensured that we have in place processes and procedures to mitigate the risks.

We have an appropriate and well-communicated [policy](#), due diligence activities based on risk assessment and effective follow-up, good quality employee and business partner training, and a strong emphasis on collaborative partnerships.

OUR BUSINESS

There has been a minor change to the structure of our business units from that shown in our [2016 Statement](#) in that our Project Delivery team now sits under our Finance business. This has no impact on the scope of our modern slavery and human trafficking activities, but we have included the updated structure below for completeness:



2017 ACTIVITY

During 2017 Edinburgh Airport carried out the activity it proposed to in its [2016 Statement](#). We:

- assessed potential risk areas in our supply chain and the wider business;
- worked in collaboration with our business partners and partner agencies in raising awareness and preventing slavery and human trafficking;
- promoted modern slavery and human trafficking awareness through online employee training;
- made our training materials available to business partners and suppliers; and
- introduced legally binding obligations into commercial contracts with business partners and suppliers.

More detail on those activities is contained in the following paragraphs.

Supply Chain Due Diligence

During 2017 our Procurement department completed a risk assessment of the airport's supply chain and focused on the areas where the assessment identified a higher risk of modern slavery occurring.

Edinburgh Airport's supplier base mainly consists of UK companies and branches. Our review identified around 70 higher risk suppliers, who were all invited to complete a modern slavery and human trafficking questionnaire to help us understand their individual risk profile. As a result of this exercise we remain confident that our supply chain does not present a high modern slavery risk.

Edinburgh Airport HR Practices

Edinburgh Airport has procedures in place to check references and carry out face to face interviews with new employees. We also carry out identification, background and right to work checks as part of our normal operational procedures. These recruitment and vetting processes ensure that we do not employ any victims of modern slavery or human trafficking.

Edinburgh Airport is committed to the [Scottish Business Pledge](#) and pays its employees at least the living wage.

Edinburgh Airport Risk Advisory Group & Stakeholder Agencies

Senior leaders from our business and from our partners including the Scottish Police and UK Border Force are members of a Risk Advisory Group (RAG) at the airport. This group reports to our Chief Operating Officer. The members of this group have expert knowledge of their respective areas within the airport and seek to identify and mitigate risks in airport security and other threats. Recognising the risk of victims of modern slavery or human trafficking travelling through the airport, during 2017 modern slavery and human trafficking risk was introduced as a standing item on this group's risk register and as a result the airport's activity in this area has been and will continue to be periodically reviewed and evaluated in this forum.

Outside the RAG Edinburgh Airport worked collaboratively with UK Border Force, Scottish Police and other groups operating at the Airport to assist them in detecting and disrupting potential occurrences of human trafficking. Opportunities arose through regular meetings to discuss operational issues at the Airport and to incorporate modern slavery and human trafficking measures into such discussions.

Training and Awareness

Throughout 2017 our online Modern Slavery training course was available to all Edinburgh Airport employees, and was completed by employees from all areas of our business.

The same training was made available to all business partners at the airport for their own staff.

Edinburgh Airport also worked with City of Edinburgh Council during 2017 in running workshops to raise awareness amongst airport and business partner staff.

Policies and Contracts

We published our [Anti-Slavery and Human Trafficking Policy](#) in June 2017 and introduced obligations on our suppliers both at the 'onboarding' stage and within their contracts. Our standard supply contract wording includes a requirement that suppliers comply with the Modern Slavery Act 2015, conduct necessary risk assessments and inform Edinburgh Airport of any instances of modern slavery identified. Suppliers in breach these terms may face termination of their contract.

LOOKING AHEAD TO 2018

We will remain focussed on modern slavery and human trafficking issues in 2018, including by:

- carrying out face-to-face targeted and specific training with the airport's Security Team, Welcome Team and retailers to compliment the online training course;
- putting modern slavery and human trafficking issues and activities onto the agenda of a new Joint Security Group at the airport to increase the opportunities for discussion, sharing best practice and the introduction of mitigating actions;
- continuing to introduce modern slavery obligations into new contracts; and
- continuing to take advantage of other opportunities with our business partners and agency partners to promote modern slavery awareness and activities when these arise.

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 2017.



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