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# MODERN SLAVERY ACT 2015 STATEMENT

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This statement is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2016, and has been approved by the Board of Directors of Heathrow Airport Holdings Limited on behalf of the Heathrow Group. Information set out in this statement is correct as of the date of publication.

## **Introduction by John Holland-Kaye the Chief Executive Officer of Heathrow Airport Holdings Limited**

Heathrow welcomes the introduction and implementation of the Modern Slavery Act 2015.

Heathrow is one of the world's leading international hub airports, and one of the main points of entry in to and exit from the United Kingdom. As such we have a unique responsibility to lead the way in preventing slavery and human trafficking. We are committed to maintaining and continuously improving our practices to combat slavery and human trafficking across Heathrow Airport. We are also working with Heathrow business partners (including suppliers, airlines, ground-handlers and retailers) to combat slavery and human trafficking in their supply chains.

As a Responsible Gateway, Heathrow must take the best possible care of everyone that passes through its gates. Unfortunately, we live in a world in which slavery and human trafficking still takes place. That's why, by working together with our business partners, and across the wider Team Heathrow, we are committed to tackling the slavery and human trafficking. Our Modern Slavery Act 2015 Statement sets out an overview of the many ways in which we demonstrated that important commitment in 2016.

Heathrow 2.0, our recently launched plan for sustainable growth, captures the momentum of an industry-wide shift towards a sustainable future for aviation. It embodies the steps being taken by Heathrow towards preventing modern slavery and human trafficking. By working with our business partners and stakeholders on our joint challenges and responsibilities, we can create a future where our business, our people, our communities and our world can all thrive.

John Holland-Kaye, Chief Executive Officer  
**Heathrow Airport Holdings Limited**



## Heathrow's Structure

Heathrow Airport Holdings Limited ("Heathrow") indirectly owns (i) Heathrow Airport Limited, which owns and operates Heathrow Airport, the largest airport in the UK; and (ii) Heathrow Express Operating Company Limited, which operates the Heathrow Express rail service.

Heathrow is the intermediate parent company of the Heathrow Group. Heathrow (and the Heathrow Group) is indirectly owned by investment vehicles controlled or managed by Ferrovial S.A. (25.00 per cent.), Qatar Holding LLC (20.00 per cent.), Caisse de dépôt et placement du Québec (12.62 per cent.), the Government of Singapore Investment Corporation (11.20 per cent.), Alinda Capital Partners (11.18 per cent.), China Investment Corporation (10.00 per cent.) and Universities Superannuation Scheme (10.00 per cent.).

The Heathrow Group has over 6,000 direct employees and operates in the United Kingdom. For a more detailed description of our business, including profit and loss, and balance sheet, please refer to the latest annual reports and financial statements of the Heathrow Group entities.

## Heathrow's Business

Welcoming over 75 million passengers in 2016, Heathrow Airport is Europe's biggest, and the world's seventh biggest airport in terms of total passengers. Heathrow Airport is the primary airport in London, which is the world's largest origin and destination aviation market with approximately 155 million passengers travelling to and from London annually. Heathrow Airport plays a critical role in the global aviation industry is underlined by the fact that five of the top ten intercontinental long-haul routes globally pass through Heathrow Airport.

By connecting the UK with overseas markets, Heathrow enables businesses to reach customers around the world. It supports trade, attracts foreign investment into the UK and it brings overseas visitors to our shores. As one of the world's leading international hub airports, Heathrow Airport provides the UK with global connectivity. One of the UK's biggest single-site employers.

## Our Supply Chain

Heathrow provides a thriving community for over 76,000 people from more than 400 companies, from the biggest airline alliances to the single self-employed cabbie. We call them "Team Heathrow". Heathrow's influence therefore stretches far beyond the airport's boundary. We aim to operate Heathrow Airport as a place that drives change throughout our supply chain, delivering the most ethical, sustainable and low-carbon procurement and sourcing possible.

Heathrow's supply chain is both extensive and global, and incorporates a wide range of products, and services spanning a variety of industry sectors, broadly grouped as follows:

- Capital Construction and Property;
- Engineering, Maintenance & Facilities Management;
- Professional Services;
- Passenger Experience;
- IT Services and Telecoms;
- Office Services, Supplies, Uniforms & Travel; and
- Group Service Contracts (including statutory services, rent, rates, utilities, policing etc.).

Heathrow is committed to complying with all applicable laws and regulations as well as to conducting its supply chain activities in a fair, transparent and professional manner at all times.

We are currently working with external experts to undertake a detailed review of our supply base so that we can complete a risk assessment and formulate action plans to mitigate risk accordingly.



**6,000**  
DIRECT EMPLOYEES



**75**  
MILLION PASSENGERS IN  
**2016**

**76,000**  
PEOPLE FROM MORE THAN  
**400**  
COMPANIES

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## Our Policies & Contractual Controls

Heathrow will not tolerate slavery or human trafficking in its business or supply chain. We embed and maintain effective systems, controls and internal policies to prevent slavery and human trafficking, and take all allegations of slavery and / or human trafficking seriously.

Our Modern Slavery Policy (the "Policy") approved in May 2017;

- Makes it clear that Heathrow's approach is not to tolerate modern slavery and human trafficking;
- Sets out Heathrow's approach to maintaining and enforcing effective systems and controls to prevent modern slavery and human trafficking within our business and supply chain
- Clarifies each individual's role in complying with applicable laws and safeguarding vulnerable persons against modern slavery and human trafficking;
- Provides clear guidance explaining the concepts of modern slavery and human trafficking, and what needs to be done where an individual suspects modern slavery or human trafficking is taking place at Heathrow Airport or in our supply chain;
- Makes it clear that Heathrow expects its supply chain to comply with the requirements of the Policy, including that Heathrow Business Partners are expected to conduct themselves in accordance with the standards set out in the Policy;
- Includes a statement confirming that Heathrow will not tolerate modern slavery or human trafficking at any tier in our supply chain; and
- Includes Heathrow's commitment to working collaboratively with Heathrow Business Partners to increase awareness, detection and prevention of modern slavery and human trafficking, and to promote responsibility on this issue and ensure that we are transparent in our actions.

Our Sustainable Procurement Policy governs the products and services we buy, the organisations we do business with, and the contracts that we manage across all four pillars of our plan for sustainable growth, Heathrow 2.0. Sustainability is embedded into all procurement processes from sourcing strategies, tenders, evaluations, contract clauses and KPIs.

Our Whistleblowing Policy is aimed largely at our employees (permanent or temporary), but also applies to consultants, agency workers, contractors working at Heathrow Airport. This policy encourages individuals to report any wrongdoing which extends to slavery and human trafficking. All whistleblowing reports are treated in the strictest confidence and are investigated fully with appropriate remedial actions taken, where necessary in accordance with Heathrow's Internal Investigations Policy.

## Training to Employees

To further ensure an understanding of the risks of modern slavery and human trafficking across our business we have committed to raising awareness and understanding among employees on the importance of preventing any form of modern slavery and human trafficking. We will build education on this into our ongoing learning and development programmes across the business.

In addition, we are continuing our training for security officers to recognise the way in which people who are being trafficked might present at Heathrow Airport, and to offer assistance to those who might be vulnerable.

## Training to the wider Heathrow community

Heathrow works collaboratively with UK Border Force, the Met Police and other agencies operating at Heathrow Airport to assist them in detecting and disrupting potential occurrences of human trafficking.





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## Our achievements in 2016 in helping raise awareness of Modern Slavery and Human Trafficking

During the past year we have taken various steps to increase our awareness of slavery and human trafficking across Heathrow Airport.

To support making Heathrow a Responsible Gateway to the UK (a place that strives to end trafficking of people and wildlife) we launched The Responsible Gateway Forum in Autumn 2016. The Forum, chaired by Heathrow Travel Care, focuses on how we are working with our partners on preventing human exploitation, trafficking and how we can protect all vulnerable people travelling through Heathrow Airport.

On 18 October 2016 (World Anti-Slavery Day) Heathrow, together with UK Border Force, hosted an Anti-Slavery Day Lunch. Over 75 people attended from our suppliers, airlines, civil service and NGO stakeholders. Attendees received a brief address from the Minister for Vulnerability, Safeguarding and Countering Extremism, Sarah Newton MP and the UK's first Anti-Slavery Commissioner, Kevin Hyland OBE. At the event, we launched UK Border Force's Modern Slavery training tool for port stakeholders, with over 30 Team Heathrow companies making pledges to train their colleagues over the coming year.

In November 2016, at our Annual Supplier Conference and Awards, we hosted a workshop with our strategic suppliers to share our thoughts and seek their input into our forthcoming sustainability strategy. We sought feedback on supplier plans already in place, including around preventing slavery and human trafficking in the supply chain. On the day itself, over 15 suppliers pledged to work with us to tackle slavery and human trafficking in all their forms.

In December 2016, Heathrow Airport became a Partner of the Supply Chain Sustainability School (the "School"), which provides practical support to suppliers in the form of e-learning modules, tailored self-assessments, action plans and sustainability training which includes ethical business practices, Anti-Slavery and Human Trafficking. We intend to have all strategic suppliers to become members of the School by the end of 2018 and plan to roll this out more widely thereafter.

It is important to note that in February 2017 we launched Heathrow 2.0, our plan for sustainable growth. It represents a step-change for our business and captures the momentum of an industry-wide shift towards a sustainable future for aviation. By working with partners and stakeholders to devise solutions, and by investing in, and implementing breakthrough technology, we can create a future where our business, our people, our communities, our country and our world can all thrive.

Our goals in Heathrow 2.0, which embody steps taken by Heathrow in 2016 towards preventing modern slavery and human trafficking, include;

- To work with our supply chain and Team Heathrow to tackle modern slavery and human trafficking in all their forms (Goal 9.5); and
- To operate Heathrow as a Responsible Gateway – a place that strives to end trafficking of people (Goal 12.1).

## Our future commitments to combatting Modern Slavery and Human Trafficking

Heathrow is committed to maintaining a leadership role in working with Heathrow's Business Partners and Team Heathrow in tackling the issue of modern slavery and human trafficking. We will keep our focus on the continuous improvement and delivery of effective strategies to meet this important commitment.

