

Modern Slavery Policy for Heathrow Airport Limited

Date policy last reviewed and updated (if required):	March 2024
Last approved by Executive Committee on:	21 May 2024
Executive Director accountable for this Policy:	Paula Stannett, Chief People Officer
Function Policy Lead:	Fiona Tice, Engagement & Business Partnering Director
Version number:	2.0

Purpose

Given Heathrow's position as a leading international hub airport, we recognise that we are uniquely placed to perform an important role in preventing modern slavery and human trafficking (as such terms are defined in the Guidance Notes). We are committed to operating as a responsible gateway to the world by tackling people crime.

The purpose of this policy (the "**Policy**") is to:

1. set out Heathrow's approach to preventing modern slavery within our business and supply chain; and
2. clarify your role in complying with relevant law and safeguarding vulnerable persons against modern slavery.

Scope

This policy applies to:

1. All directors and colleagues of Heathrow's group of companies (including LHR Airports Limited) ("**Heathrow**") wherever located. This includes colleagues employed on permanent, temporary or fixed-term contracts.
2. All third parties associated with Heathrow, including agents, volunteers, consultants, contractors and their employees ("**Heathrow Business Partners**"), are expected to conduct themselves in accordance with the standards set out in this Policy.
3. This Policy may be amended at any time.

Policy

Heathrow's Approach

Heathrow will not tolerate modern slavery in its own business or in its supply chain. We will maintain and enforce effective systems and controls to prevent modern slavery, including as set out in the Individual Responsibilities, below, and by:

1. Working collaboratively with Heathrow Business Partners (including suppliers, airlines, retailers, Police, Border Force and Heathrow Travel Care) to increase awareness, detection and prevention of modern slavery and to promote responsibility on this issue; and
2. Ensuring that we are transparent in our actions to tackle modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Individual Responsibilities

You should:

1. Avoid any activity that might be, assist or enable modern slavery (and avoid any conduct that could be perceived as being any such activity); and

2. Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain at any tier at the earliest possible stage to your line manager or in accordance with our Whistle Blowing Policy.

If it is urgent, for example if you suspect that people are being illegally trafficked through Heathrow, you should report it immediately to your line manager or Heathrow Police on 222 (or 0208 759 1212 from a mobile or external phone).

In addition, all colleagues and Heathrow Business Partners involved in Procurement activities for Heathrow should:

- Lead by example and co-operate to prevent human exploitation throughout our supply chain at any tier;
- Complete training on what constitutes modern slavery, the reason it is important to Heathrow and the identification of indicators of modern slavery;
- Comply with relevant anti-slavery procedures during the tendering process and during the term of each supply agreement;
- Ensure that appropriate provisions in respect of modern slavery are included in supply agreements; and
- Enable and monitor regular audits with our key suppliers as well as those deemed to be at a higher risk for modern slavery, as appropriate.

If you witness or suspect any breach of this Policy, do not remain silent: you should report it as per above. Your concerns will be taken seriously and will be investigated in a confidential manner.

Heathrow is committed to ensuring no one suffers any detrimental treatment as a result of report such concerns in good faith.

Consequences of breach of the Policy

We will investigate any breach of this Policy by any Heathrow colleague and/or Heathrow Business Partner and will take appropriate action in the circumstances.

Ownership and Management Review of the Policy

This policy is owned by the People Team and will be reviewed on an annual basis.

Guidance Notes

What is Modern Slavery?

Modern slavery is a heinous crime and a violation of fundamental human rights which occurs globally, as well as in the United Kingdom.

It can take various forms, including slavery, servitude, forced/compulsory labour and human trafficking. Each of these forms constitutes offences under the Modern Slavery Act 2015 and have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Specifically, the term "modern slavery" includes:

Slavery: the status or condition of a person over whom all or any powers attaching to the right of ownership are exercised, which deprives the victim of their freedom;

Servitude: the obligation to provide services imposed by coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her conditions:

Forced or compulsory labour: the obtaining of work through coercion, penalty, direct threats of violence or more subtle forms of compulsion, and for which the person has not offered him/herself voluntarily; and

Human trafficking: the arranging of or facilitating travel of another person (with or without their consent) with a view to that person being exploited.

Under Section 54 of the Modern Slavery Act 2015, Heathrow Airport Holdings Limited, as an in-scope company, is required to publish an annual statement setting out the steps taken (if any) to ensure that there is no slavery or human trafficking in its own business and its supply chain. This Policy, and the actions arising from it, will form the foundation of our annual Section 54 statement.