

**Committed to ending Modern Slavery – Farnborough Airport BidCo Limited, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited's Modern Slavery Statement 2019**

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015, which requires businesses to disclose the steps that they are taking to tackle modern slavery. It sets out the steps taken by Farnborough Airport BidCo Limited, and certain of its subsidiary companies (being Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited), collectively known as “Farnborough Airport”, to prevent modern slavery in its own business and supply chain for the financial year ended 31<sup>st</sup> December 2019.

**Our commitment**

At Farnborough Airport we are committed to eliminating all forms of modern slavery from our operations and supply chain.

To deliver on these commitments:

- We endeavour to act as a responsible company that behaves ethically and with integrity across all aspects of our operations;
- We adopt the highest professional standards and comply with all laws and regulatory standards applicable to our operations; and
- We review our progress continually to improve our management approach.

**Our Business Structure**

Farnborough Airport BidCo Limited operates as a holding company. Through its subsidiaries, notably Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited, the company operates and maintains airport facilities, runways, handling services and a hotel.

Farnborough Airport is the UK’s only dedicated private business aviation facility, based in Hampshire. We provide premium services including aircraft handling, hangarage, flight briefing and world class passenger facilities, including an on-site hotel. We employ around 300 people including fire and rescue personnel, ground handling staff, engineering and maintenance teams, customer services agents and hotel personnel. We also work with business partners and contractors to provide a range of services to passengers at the airport, including security.

We have approximately 1,500 suppliers providing a variety of goods and services, ranging from security and maintenance, to air traffic control and catering. We proactively try and procure goods and services locally where possible. Around 97% of our active suppliers are based in the UK.

**Company Policies**

We have the following policies in place to help manage our modern slavery risk.

- Our **Sustainable Procurement Policy** outlines our commitment to embedding sustainability in procurement decisions, including a provision on modern slavery.
- Our **Whistleblowing Policy** provides a mechanism for staff to raise any concerns, including reporting instances of modern slavery. There were no reports relating to modern slavery made through these channels in 2019.

- Our **Anti-Bribery Policy** sets out our responsibilities, and those of our employees, in observing and upholding our position on bribery and corruption, and provide information and guidance to our employees how to recognise and deal with these issues.
- Our **Equal Opportunities Policy** commits us to ensure that everyone connected with the organisation (including during the recruitment process) is treated fairly and with respect, regardless of race, sex, sexual orientation, gender reassignment, age, religion, politics, marital status, disability, and/or union membership.

The Anti-Bribery and Equal Opportunities Policies are provided to new employees as part of their contracts. The other policies are available on our intranet. We are continuing to develop a standalone modern slavery policy outlining our expectations to suppliers and recruitment agencies going forward.

### **Risk Identification**

Our risk assessment process considers strategic and operational matters of importance to the company and has informed the development of the policies and procedures referenced in this statement. Our primary modern slavery risk areas are in our supply chain, but we recognise that we also have a role to play in identifying any instances of human trafficking through the airport. We are developing further our focus on modern slavery risk, the results of which will be disclosed in our 2020 Modern Slavery Statement.

### **Due Diligence**

Our Sustainable Procurement Policy requires new suppliers to respond to our sustainable procurement questionnaire. This includes environmental provisions, and asks for confirmation that human trafficking and modern slavery does not exist in the supplier's operations or supply chain. We are working to extend this to all relevant existing suppliers, and include provisions on modern slavery in supplier contracts.

### **Planned development of our Modern Slavery programme**

In the coming year we will explore appropriate and practical performance indicators to monitor the effectiveness of our efforts to combat modern slavery in our operations and supply chain. We will equip our customer services team with the knowledge to identify 'red flags' associated with human trafficking and modern slavery, and make sure that the appropriate escalation processes are in place should an incident of human trafficking be identified. We are committed to preventing Farnborough Airport from being used as an entry or exit point for human trafficking.

This statement has been approved by the Boards of Farnborough Airport BidCo Limited, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited. This statement has been approved late due to the ongoing impact of Covid-19 on Farnborough Airport.



**Simon Geere**

Director, Farnborough Airport BidCo Limited, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited.

Date: 3<sup>rd</sup> July 2020