

MODERN SLAVERY STATEMENT - for the financial year ending 31 December 2021

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

This statement is published in accordance with Section 54 of The Modern Slavery Act 2015.

Introduction

Farnborough Airport BidCo Ltd and its subsidiaries are opposed to slavery, human trafficking and the use of forced labour of any kind. This statement outlines the approaches the company has taken in **2021** to prevent modern slavery and ensure human trafficking is not taking place in our businesses or our supply chains.

Farnborough Airport (the trading name of Farnborough Airport Limited) and the Aviator Hotel (the trading name of Aviator Hotel (Farnborough) Limited) recognise their responsibilities as a business aviation airport and hotel to ensure that slavery and human trafficking is not occurring in any part of their business or supply chain.

Business Structure

Farnborough Airport BidCo Limited operates as a holding company. Through its subsidiaries – 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 only UK dedicated private business aviation facility, based in Hampshire. We provide premium services including aircraft handling, hangarage, airport operations and world class passenger facilities including an on-site hotel. We employ around 310 people including fire and rescue personnel, ground handling staff, engineering and maintenance teams, customer service 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.

Supply Chains

Across the business in both Farnborough Airport and the Aviator Hotel we have 775 suppliers providing a variety of goods and services ranging from security and maintenance to air traffic control and catering. We proactively try to procure goods and services locally where possible. 96% of our active suppliers are based in the UK, the remainder are from Europe (2%) and the USA (3%).

Modern Slavery in our Business

We continue to improve our practices to identify and eliminate modern slavery which may occur within our businesses, supply chains and across our airport and hotel operations. The most significant change to support this commitment in 2021 has been the introduction of a procurement function. This role has been key for us to further develop our procurement process; improve our due diligence around the supplier onboarding process and collate data to enable further assessment our existing supply chain. All new suppliers are assessed across a number of criteria, asked to declare that they have modern slavery procedures in place and our tender documents and contract terms have been revised to improve the positioning of our policies and processes.

In 2021 we also introduced a new online platform to manage our pre-employment screening, this improves our process of ensuring all employees undergo a DBS or criminal records check thus reducing the risk of human trafficking.

Anyone entering the airport site will need to produce the appropriate ID. Our security teams have the right to perform random searches of vehicles to ensure no trafficked people are hidden within them. We have identified a new training course to ensure our customer service teams are trained to identify likely situations and individuals who may be being trafficked and report these situations through appropriate channels. We are committed to preventing Farnborough Airport and the Aviator Hotel from being used as an entry or exit point for human trafficking.

We are therefore reviewing how we make sure we are effective in looking for the signs of potential slavery and human trafficking and how we ensure such behaviour does not occur in our business. This includes consideration of how we might use other risk information areas for example: from supplier audits, evaluations of supplier questionnaires, reporting of counterfeit, fraudulent and suspect items, safety audits and security checks to focus on modern slavery risks and human trafficking through the airport and hotel.

Company Policies

We have the following policies in place to help manage our modern slavery risks:

- Our **Sustainability Procurement Policy** outlines our commitment to embedding sustainability in procurement decisions including a provision on modern slavery.
- Our **Confidential Disclosure Policy** outlines the **Whistleblowing** process and provides a mechanism for staff to raise any concerns including reporting instances of modern slavery.
- Our **Modern-Slavery Policy** sets out the responsibilities and compliance over supply chains and human trafficking.

We regularly review and update our policies.

Risk Assessment and Due Diligence

Our review of our supply chain by country, sector, transaction, and business partnership for modern slavery risks is likely to become an ongoing process, acknowledging that supply chains can evolve quickly as we have seen in recent times due to Covid. The first wave assessment of our initial review is nearing completion and is likely to suggest our suppliers are “low risk”.

As part of the ongoing development of our supplier relationships, we will specifically assess the slavery and human trafficking risks arising from each such relationship. From that review, we will identify and take appropriate steps to address those risks, which may include placing appropriate contractual obligations on suppliers, working with the supplier to make improvements or ceasing to work with a supplier entirely.

Our primary modern slavery risk areas are in our supply chains, however we recognise that we also have to identify any instances of human trafficking through the hotel and airport.

Monitoring

During 2021 there were no reported cases of Modern Slavery and Human Trafficking within our airport or hotel business. However, we are conscious that we need to guard against complacency and remain diligent in this regard.

Legal Compliance

We continue to require our suppliers to comply with the laws and regulations applicable to them in relation to modern slavery, human rights, anti-bribery, tax evasion and corruption, employment practices, data protection, cyber securities, quality, health and safety and the environment. We also expect our suppliers to ensure that their sub-suppliers comply with the laws and regulations applicable to them and meet the same standards.

Training

Our People Team source courses from our training provider. They will be rolling out new training for modern slavery across the business.

Planned development of our Modern Slavery programme


In the coming year we are committed to:

- concluding our initial supply chain review to understand the locality and increased risk based on the goods/services that are provided to us.

- the introduction of a New Supplier Code of Conduct to provide a clear understanding of our standards and our expectations for all parties that we work with, which would include our position in relation to modern slavery and human trafficking.
- embedding our New Supplier selection, onboarding and due diligence processes.
- employee training; and
- measuring our progress as follows:
 - percentage of employees who have participated in modern slavery training;
 - percentage of suppliers signed up to the Supplier Code of Conduct; and
 - number of suppliers engaged as a result of locality review.

The Modern Slavery Act 2015 – Transparency in Supply Chain statement

This statement is made on behalf of **Farnborough Airport BidCo Limited and its subsidiary companies, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited** in accordance with the obligation to make a modern slavery statement (Statement) under s54(1) of the Modern Slavery Act 2015 and was approved by the by the boards of directors of each of Farnborough Airport Bidco Limited, Farnborough Airport Limited, and Aviator Hotel (Farnborough) Limited on 25th March 2022.



Signed:

Simon Geere

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