

## MODERN SLAVERY STATEMENT - 2020

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

*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. The company has established policies and processes in our businesses and supply chains in support of this position. This statement outlines the approaches the company has taken in 2020 to prevent modern slavery and ensure human trafficking is not taking place in our businesses or our supply chains.

Farnborough Airport and the Aviator Hotel 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.

Going forward for 2021, consistent with the UK Government guidance on the Modern Slavery Act, we are performing a review of the suppliers who are not local by: country, sector, transaction and business partnership to help Farnborough Airport and the Aviator Hotel to better understand and appropriately target any modern slavery risks in our supply chains.

### Business Structure

Farnborough Airport BidCo Ltd operates as a holding company. Through its subsidiaries – Farnborough Airport Ltd and Aviator Hotel (Farnborough) Ltd 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 300 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 we have 1029 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.

## Modern Slavery in our Business

Based on our business strategy we will develop our procurement process to focus on a comprehensive review of our supply chains with supply base consolidation, management of our relationships with our retained strategic suppliers and ensuring our suppliers act in accordance with our ethical principles.

We ensure all our employees undergo a DBS or criminal records checks thus reducing the risk of human trafficking. Our new suppliers too must declare on a questionnaire if they have any modern slavery procedures in place.

Anyone entering the airport site will need to produce the appropriate ID. Random searches of vehicles are performed by our security teams, to ensure no trafficked people are hidden within them. 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 prevent 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 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.

## Risk Assessment and Due Diligence

As mentioned in our introduction, we are performing a review of our supply chain by country, sector, transaction, and business partnership for modern slavery risks. This will help our business to better understand and appropriately target these risks in our supply chains. We will begin by focusing risk assessments on suppliers with enhanced risk profiles, such as the country they are based in and our risk assessment will incorporate learnings gained through supplier audits. The review of our supply chains will also include an evaluation of whether each supplier is aligned with our ethical values.

As part of the review and 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 2020 there were no reported cases of Modern Slavery and Human Trafficking. 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**

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

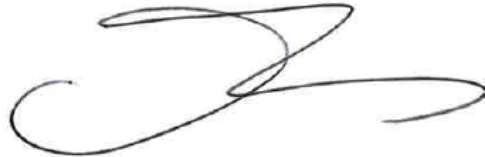
## **Planned development of our Modern Slavery programme**

In the coming year we aim to further explore appropriate and practical key performance indicators to monitor the effectiveness of our efforts to combat modern slavery in our operations and supply chain.

## The Modern Slavery Act 2015 – Transparency in Supply Chain statement

This statement is made on behalf of **Farnborough Airport BidCo Ltd and subsidiary companies** in accordance with the obligation to publish a modern slavery statement (Statement) under

s54(1) of the Modern Slavery Act 2015.



Signed: \_\_\_\_\_

**Simon Geere**

Director Farnborough Airport Bidco Ltd, Farnborough Airport Ltd and Aviator Hotel (Farnborough) Ltd.