

Modern Slavery and Human Trafficking Policy Statement 2020

1 Our Structure, Business and Supply Chains

1.1 Birmingham Airport Holdings Ltd (BAHL) is the parent company of the group of companies which own and operate Birmingham Airport. This statement relates to all companies in the group, including Birmingham Airport Ltd, Birmingham Airport Services Ltd, Birmingham Airport Air Traffic Ltd and BHX Fire and Rescue Ltd.

1.2 BAHL and its subsidiaries operate exclusively in the highly regulated UK airport sector. All work is carried out in accordance with UK Government tax regulations and the UK health and safety regime. The majority of work is carried out at the Birmingham Airport site, where employees of BAHL, and its contractor supply chain, are subject to security verification of their identity and a criminal record check. The recruitment and vetting processes ensure that we do not employ perpetrators or victims of modern slavery or human trafficking. The Directors believe that this significantly reduces the risk of contravention of the Modern Slavery Act 2015.

1.3 BAHL does use a wide variety of local, national and in some cases international supply chains to source equipment and services for the operation and development of the Airport. Directors recognise that this makes checking for illegal activity within our supply chain challenging, but there are a number of factors that reduce the risk of slavery and human trafficking in our supply chains and have assessed potential risk areas in our supply chain and the wider business.

- Our work is generally skilled and requires competent capable skilled operatives who hold relevant industry or professional qualifications.
- As a single site operator our contractor supply chains are generally short, and use established and regular contractors, who also work exclusively within the regulated UK economy.
- The Control of Contractors Office also ensures that additional stringent security requirements including identity verification, referencing and criminal record checks are undertaken, and contractors work at the airport is constantly monitored by our own employees allowing a high degree of visibility of our contractors' staff.
- The majority of our material supplies are generally sourced through UK distributors or UK companies, allowing strong commercial controls to be applied to encourage compliance with the Modern Slavery Act 2015.
- Material sourced from outside the UK is rare and is generally specialist high-tech equipment, where the nature of the supplier should also enable relevant controls in each instance.

1.4 Our relationships with our suppliers are all on commercial arms-length terms, allowing for terms requiring compliance with relevant statute, such as the Modern Slavery Act 2015 to be included. As a well-established business, our relationship with our employees allows a high degree of engagement with senior management, both directly and through trade unions, which would allow concerns over slavery and human trafficking to be raised should they occur. We also have an established whistleblowing policy including a free confidential independent helpline number.

2 Our Policies in Relation to Slavery and Human Trafficking

2.1 BAHL, and all its subsidiary companies is fully committed to tackling slavery and human trafficking and embraces the principles of transparency that underpins the Modern Slavery Act 2015.

- 2.2 Our purpose 'proud of every journey' launched in October 2019, sits at the core of everything we do. It is the anchor for our new corporate strategy and is supported by six key pillars, or business imperatives, which are: *Growth, Customer, People, Neighbour, Efficiency and Safety & Security*. Under each of these pillars are a set of KPIs which we track to monitor and measure our progress. Having these new business imperatives give us a clear purpose, enabling us to focus not only on what we do, but how we do it, paying attention to the things that really matter and which underpins our approach to doing business with integrity
- 2.3 Our approach has been divided into two areas, each with a named individual responsible for monitoring and reporting that modern slavery and human trafficking are not taking place in our businesses or supply chain,
- 2.4 We recognise that we have more work to do and will continue to review and develop our existing policies and practices to help our colleagues and suppliers understand the risks associated with modern slavery and have the confidence to always speak up and report if something doesn't feel right, and Protect, our independently operated whistleblowing helpline is also available to employees and details are published on our intranet.

Within the Group

- 2.5 The Group employs over 900 employees and it is ensured that pay and conditions remain at a high standard, above those dictated by the Act. Any potential contravention will be dealt with seriously and investigated appropriately by the Board. Any whistleblowing or complaint by an employee will be supported and investigated through our formal whistleblowing or grievance procedures.
- 2.6 Directors believe that the risk of failing to comply with the Modern Slavery Act 2015 within our Group is low, because of the following measures:
- All employees are on full written conditions of employment that have been checked for compliance with the Act.
 - All employees are paid above the "Living Wage".
 - As a matter of policy, BAML will not pay earnings into an account in the name of any individual other than the employee.
 - Our work experience programme ensures that participants are closely controlled in liaison with the individual's school, college or university.
 - Employees must complete the Modern Slavery and Human Trafficking e-learning module as part of the process required to obtain/renew their airport ID pass.
- 2.7 The People Director is responsible for ensuring compliance with these requirements.

Within our Contractor & Equipment/Material Supply Chains

- 2.8 BAML companies will work to prevent modern slavery and human trafficking within our supply chains by working to influence behaviours within directly contracted organisations. Any failure to address these issues that results in a contravention of the Act, a possible contravention, or a perceived contravention of the Act that could impact the reputation of the BAML Group may be investigated and result in a variety of actions, up to and including removal, from our supply chain, or exclusion from procurement exercises, and to mitigate any such occurrence we have adopted the following:

- work in collaboration with our onsite partners in raising awareness and preventing slavery and human trafficking.
- promoted modern slavery and human trafficking awareness through online employee training and made it compulsory for all new starters to complete this module before being issued with an airport ID.
- introduced obligations which are legally binding into commercial contracts with business partners and suppliers.

2.9 We continue to gather Slavery and Human Trafficking Statements from thirty of our new suppliers impacted by the Act. We continue to obtain Slavery and Human Trafficking Statements from all suppliers within our supply chain that are impacted by the Act.

2.10 Within the current financial year BAML companies will undertake the following activities:

- Continuation of a rolling review and amendment of standard terms of contract to incorporate the requirements of the Act as contracts are placed or renewed.
- In response to the COVID-19 crisis, procurement decisions will partly be made based upon the extent to which suppliers put in place measures to respond to government guidelines in relation to safe working practices in the workplace.
- Where suppliers are working at the Airport, they will be required to submit risk assessments to facilitate safe work practices with COVID-19 in mind.
- Procurement exercises that are undertaken in accordance with EU Procurement Directives will contain specific reference to the Modern Slavery Act. This will permit the Airport to exclude companies, at pre-qualification / selection stage, from procurement exercises should they not explicitly state their organisation fully complies with the Act.
- Large companies that are appointed to supply goods and services to the Airport and are caught by the Act will be expected to provide their slavery and human trafficking statements for our records and review.
- Training of appropriate employees on the requirements and ethos of the Act and the implications to the supply of goods and services to BAML Group companies has been delivered.

2.11 The Procurement Manager is responsible for compliance with these requirements.

3 Due Diligence Processes in Relation to Slavery and Human Trafficking

3.1 Whilst Directors believe that BAML companies are generally low risk they will continue to review this as part of their overall risk management framework, and monitor industry experience to ensure appropriate due diligence processes.

4 Risk Assessments for BAML Group and its Supply Chains

4.1 In the current financial year we will continue to assess key risks to contravention of the Act within our own business, our contractor and equipment/material supply chains. If this identifies areas of concern, we will develop mitigations that we will carry out in future to manage the risk as effectively as possible.

5 Measuring the Effectiveness of the Policies

5.1 The low risk nature of our business makes measures of performance difficult, but we will continue to benchmark best practice in this area and adopt any appropriate measures.

6 Training about Slavery and Human Trafficking available to Employees

- 6.1 Information on the Act and supporting information on best practice and definitions will be placed upon the company intranet and incorporated into Birmingham Airport Induction Day.
- 6.2 Company policies and procedures are available on our company intranet.

Signed:



Timothy Clarke
Chairman
Birmingham Airport

1 July 2020