



---

## MODERN SLAVERY ACT STATEMENT FOR 2018

---

This Modern Slavery Act statement (the "Statement") is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2018, and has been approved by the Board of Directors of Heathrow Airport Holdings Limited ("Heathrow") on 23 May 2019 on behalf of the relevant companies of the Heathrow Group (as defined below) including those listed in Annex 1. Information set out in this Statement is correct as of 23 May 2019.

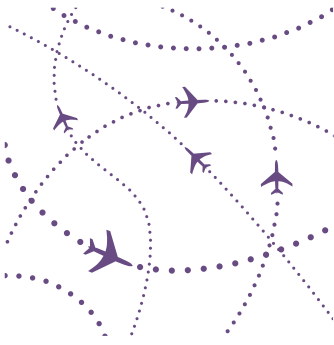
**Introduction by John Holland-Kaye the Chief Executive Officer of Heathrow Airport Holdings Limited:**

Heathrow is one of the world's leading international hub airports, welcoming over 80 million passengers a year. As a responsible Gateway, we must take the best possible care of everyone who passes through the airport.

Unfortunately, we live in a world in which slavery and human trafficking still takes place, and some of those being trafficked come through Heathrow. We are committed to tackling slavery and human trafficking, and our Modern Slavery Act Statement for 2018 gives an overview of the many ways in which we have been working with our partners to do so.

Tackling slavery and human trafficking is part of "[Heathrow 2.0](#)", our plan for sustainable growth. By working together to make real change, we can create a future where our business, our people, our communities and our world can all thrive.

John Holland-Kaye,  
Chief Executive Officer  
**Heathrow Airport Holdings Limited**



## Heathrow's Structure

Heathrow Airport Holdings Limited ("**Heathrow**") indirectly owns (i) Heathrow Airport Limited, which owns and operates Heathrow Airport, the largest airport in the UK; and (ii) Heathrow Express Operating Company Limited, which owns the Heathrow Express rail service.

The ultimate parent company of Heathrow is FGP Topco Limited (together with its subsidiaries from time to time being the "**Heathrow Group**"). Heathrow is the intermediate parent company of the Heathrow Group. The Heathrow Group is indirectly owned by investment vehicles controlled or managed by Ferrovial S.A. (25.00 per cent.), Qatar Holding LLC (20.00 per cent.), Caisse de dépôt et placement du Québec (12.62 per cent.), the Government of Singapore Investment Corporation (11.20 per cent.), Alinda Capital Partners (11.18 per cent.), China Investment Corporation (10.00 per cent.) and Universities Superannuation Scheme (10.00 per cent.).

## Our Supply Chain

Heathrow provides a thriving community for over [76,000 people from more than 400 companies], from the biggest airline alliances to the single self-employed taxi driver. We call them "Team Heathrow". Heathrow's influence therefore stretches far beyond the airport's boundary. We aim to operate Heathrow Airport as a place that drives change throughout our supply chain, delivering the most ethical, sustainable and low-carbon procurement and sourcing possible.

Heathrow's supply chain is both extensive and global, and incorporates a wide range of products, and services spanning a variety of industry sectors, broadly grouped as follows:

- Capital Construction and Property;
- Engineering, Maintenance & Facilities Management;
- Professional Services;
- Passenger Experience;
- IT Services and Telecoms;
- Office Services, Supplies, Uniforms & Travel; and
- Group Service Contracts (including statutory services, rent, rates, utilities, policing etc.).

Heathrow is committed to complying with all applicable laws and regulations as well as to conducting its supply chain activities in a fair, transparent and professional manner at all times.



**6,000**

DIRECT EMPLOYEES



The Heathrow Group has over 6,000 colleagues and operates in the United Kingdom. For a more detailed description of our business, including profit and loss, and balance sheet, please refer to the latest annual reports and financial statements of the Heathrow Group entities.

## Heathrow's Business

Welcoming 80.1 million passengers in 2018, Heathrow Airport is Europe's busiest, and the world's seventh busiest airport in terms of total passengers. Heathrow Airport is the primary airport in London, which is the world's largest origin and destination aviation market with over 150 million passengers travelling to and from London annually. Heathrow Airport plays a critical role in the global aviation industry which is underlined by the fact that five of the top ten intercontinental long-haul routes globally pass through Heathrow Airport.

By connecting the UK with overseas markets, Heathrow enables businesses to reach markets around the world. It supports trade, attracts foreign investment into the UK and it brings overseas visitors to our shores. As one of the world's leading international hub airports, Heathrow Airport provides the UK with global connectivity. It is one of the UK's biggest single-site employers.

**80.1**  
MILLION PASSENGERS IN  
**2018**

**76,000**  
PEOPLE FROM MORE THAN

**400**  
COMPANIES

---

## Supply Chain Risk Assessment and Due Diligence

Heathrow has due diligence processes which focus on (i) identifying the parts of our supply chain that present the greatest risk; and (ii) tackling slavery and trafficking risk in the supply chain.

Heathrow uses a third-party provider, SEDEX (Supplier Ethical Data Exchange), as the external auditing platform to support our supply chain due diligence processes.

We previously set out clear objectives to tackle slavery and human trafficking risk in our supply chain, through conducting a risk assessment of our supply chain, and by targeting all medium and high risk strategic suppliers (as determined in accordance with the process described below) to register on SEDEX, and this work continues as our supply chain grows.

In targeting these suppliers, we utilised the SEDEX risk methodology to identify Heathrow product categories which had a medium and high inherent risk of modern slavery.

In 2018, we extended the registration program to an increasing number of Heathrow suppliers, with a risk-based approach. We targeted the Heathrow suppliers who were the highest value to Heathrow and provided the most critical goods and services. Suppliers that were identified through this process were required to register with SEDEX and complete a self-assessment questionnaire. This questionnaire assesses the residual risk of modern slavery. As our supply chain increases, we are working hard to ensure ever increasing rates of registration.

In 2018, we introduced into the supplier selection process for new suppliers a requirement for suppliers in medium and high labour risk categories to make a commitment to registering with SEDEX. This was incorporated into the Heathrow e-Sourcing platform and is now an integral part of the internal approval process.

Heathrow Airport is a partner of the Supply Chain Sustainability School (the "School"), which provides practical support to suppliers in the form of e-learning modules, tailored self-assessments, action plans and sustainability training which includes ethical business practices, modern slavery and human trafficking. In 2018 most of our strategic suppliers became members of the School and we plan to roll this out to additional suppliers in 2019.

## Our Policies & Contractual Controls

Heathrow will not tolerate slavery or human trafficking in its business or supply chain. We embed and maintain effective systems, controls and internal policies to prevent slavery and human trafficking, and take all allegations of slavery and / or human trafficking seriously.

### Our Modern Slavery Policy (the "Policy"):

- makes it clear that Heathrow's approach is not to tolerate modern slavery and human trafficking;
- sets out Heathrow's approach to maintaining and enforcing effective systems and controls to prevent modern slavery and human trafficking within our business and supply chain;
- clarifies each individual's role in complying with applicable laws and safeguarding vulnerable persons against modern slavery and human trafficking;
- provides clear guidance explaining the concepts of modern slavery and human trafficking, and what needs to be done where an individual suspects modern slavery or human trafficking is taking place at Heathrow Airport or in our supply chain;
- makes it clear that Heathrow expects its supply chain to comply with the requirements of the Policy, including that Heathrow Business Partners are expected to conduct themselves in accordance with the standards set out in the Policy;
- includes a statement confirming that Heathrow will not tolerate modern slavery or human trafficking at any tier in our supply chain; and
- includes Heathrow's commitment to working collaboratively with Heathrow Business Partners to increase awareness, detection and prevention of modern slavery and human trafficking, and to promote responsibility on this issue and ensure that we are transparent in our actions.

Our Sustainable Procurement Policy governs the products and services we buy, the organisations we do business with, and the contracts that we manage across all four pillars of our plan for sustainable growth. Heathrow 2.0., our plan for sustainable growth, is embedded into all procurement processes from sourcing strategies, tenders, evaluations, contract clauses and KPIs.

Our Whistleblowing Policy is aimed largely at our colleagues (permanent or temporary), but also applies to consultants, agency workers, contractors working at Heathrow Airport. This policy encourages individuals to report any wrongdoing which extends to slavery and human trafficking. All whistleblowing reports are treated in the strictest confidence and are investigated fully with appropriate remedial actions taken, where necessary in accordance with Heathrow's Internal Investigations Policy.

Additionally, we have included robust provisions in our standard procurement and retail concession agreements to require our suppliers and concessionaires to comply with applicable anti-slavery legal obligations and Heathrow's own high standards, to provide relevant training to their personnel and to be transparent with their actions in this regard to enable us to monitor performance.

---

## Training Employees

To further ensure an understanding of the risks of modern slavery and human trafficking across our business we have committed to raising awareness and understanding among our colleagues on the importance of preventing any form of modern slavery and human trafficking.

In 2018, we launched an immersive e-learning module to engage Heathrow colleagues on what modern slavery is, why it's important in the context of Heathrow, signs to look out for and how to escalate concerns. The module is available to all colleagues via our learning and development platform.

All eligible colleagues completed a dedicated training package on modern slavery as part of our rolling programme of refresher training for security officers. In 2018 we also introduced a session on modern slavery as part of new starter training for security officers.

## Wider Heathrow community

Heathrow works collaboratively with UK Border Force, the Met Police and other agencies operating at Heathrow Airport to assist them in detecting and disrupting potential occurrences of human trafficking.

## Our achievements in 2018 in helping raise awareness of Modern Slavery and Human Trafficking

During the past year we have taken various steps to increase our awareness of slavery and human trafficking across Heathrow Airport with both colleagues and passengers, in addition to the steps identified above.

To support making Heathrow a Responsible Gateway to the UK (a place that strives to end trafficking of people and wildlife), we hold a Responsible Gateway Forum, chaired by Heathrow Travel Care. It focuses on how we are working with our partners on preventing human exploitation, trafficking and how we can protect all vulnerable people travelling through Heathrow Airport. In 2018 the Forum met twice.

During 2018, Heathrow also supported the A21 Can You See Me campaign, focusing on equipping the general public with indicators for recognising human trafficking, and with contact details for reporting suspected scenarios. Heathrow had a total 89 media sites showing the Can You See Me campaign throughout 2018, focusing on modern slavery, forced labour and child exploitation. Campaign materials appeared on trolleys as well as the arrivals washroom doors within all our terminals. In 2019, Heathrow is expecting to further expand the reach of this campaign through a partnership with the UK Border Force, aiming to show the campaign on immigration hall TV screens.

Our goals in Heathrow 2.0, our plan for sustainable growth, are reflected by the steps taken by Heathrow in 2018 towards preventing modern slavery and human trafficking. These goals include:

- to work with our supply chain and Team Heathrow to tackle modern slavery and human trafficking in all their forms (Goal 9.5); and
- to operate Heathrow as a Responsible Gateway – a place that strives to end trafficking of people (Goal 12.1).

## Our future commitments to combatting Modern Slavery and Human Trafficking

Heathrow is committed to maintaining a leadership role in working with Heathrow's Business Partners and Team Heathrow in tackling the issue of modern slavery and human trafficking. We will keep our focus on the continuous improvement and delivery of effective strategies to meet this important commitment.

## Annex 1: Relevant Heathrow Group companies

The following Heathrow Group companies have total turnover in excess of £36 million as at 31 December 2018 and are otherwise in scope of the Modern Slavery Act 2015:

ADI Finance 1 Limited

ADI Finance 2 Limited

FGP Topco Limited

Heathrow (AH) Limited

Heathrow (DSH) Limited

Heathrow (SP) Limited

Heathrow Airport Holdings Limited

Heathrow Airport Limited

Heathrow Express Operating Company Limited

Heathrow Finance plc

Heathrow Holdco Limited

LHR Airports Limited

