

MODERN SLAVERY ACT STATEMENT FOR 2021

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 2021, and has been approved by the Board of Directors of Heathrow Airport Holdings Limited (“Heathrow”) on [25 May 2022] 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 25 May 2022.

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

As a “Responsible Gateway”, Heathrow must take the best possible care of everyone who passes through the airport. Keeping everyone safe, treating everyone with respect and doing the right thing are three of our values, which underpin everything we do. Unfortunately, however, we live in a world in which slavery and human trafficking still takes place, and some of those being trafficked come through Heathrow.

Throughout 2021, the safety of our colleagues and passengers remained our number one priority. Despite the challenges we have faced as a result of the COVID-19 pandemic, we have remained committed to tackling slavery and human trafficking, and our Modern Slavery Act Statement for 2021 gives an overview of the ways in which we have been working to do so.

As Heathrow focuses on recovery and building back better, we endeavour to do the right thing and ensure that slavery and human trafficking continue to be tackled throughout our business and supply chain.

John Holland-Kaye,
Chief Executive Officer

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.). Heathrow Group operates in the United Kingdom.

As of 31 December 2021, the Heathrow Group has a monthly average of 5,573 colleagues. 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

The effects of the COVID-19 pandemic still represent a seismic challenge for the aviation industry, including Heathrow. In 2021, passenger traffic fell to 19.4 million, the lowest level for nearly 50 years.

Whilst the path ahead remains uncertain and full recovery of the aviation sector will take time, we move forward as a stronger and more resilient organisation, better placed for the actions we have taken over the past two years.

We maintain a strong focus on operational performance, improving the passenger experience and investing in new and upgraded facilities. At the 2021 Skytrax World Airport Awards, Heathrow was named 'Best Airport in Western Europe', eighth overall in the category of 'World's Best Airport' and was the only UK airport to win the COVID-19 Airport Excellence Award.

Heathrow Airport remains the UK's only hub airport. Hub airports combine direct passengers, transfer passengers and freight to enable long-haul aircraft to fly to destinations all over the world. These destinations could not be served by point-to-point airports which rely on local demand alone.

By connecting the UK with overseas markets, Heathrow Airport enables businesses to reach markets around the world. The airport supports trade, attracts foreign investment into the UK and we bring overseas visitors to the UK's shores. As one of the world's leading international hub airports, Heathrow Airport provides the UK with global connectivity.

Our Supply Chain

As the UK's only hub airport, Heathrow Airport has a critical role to play in the national economy – both today and in the future. We aim to operate Heathrow Airport as a place that drives change throughout our supply chain, delivering ethical, sustainable, and low-carbon procurement and sourcing as far as 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.

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 thorough risk assessment, 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.

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.

Our supplier selection process for new suppliers includes a requirement for suppliers in medium and high labour risk categories to make a commitment to registering with SEDEX. This is an integral part of the internal approval process.

Heathrow 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.

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 human trafficking very seriously.

Our Modern Slavery Policy (the “Policy”):

- makes it clear that Heathrow’s approach is not to tolerate modern slavery or human trafficking;
- sets out Heathrow’s approach to maintaining and enforcing effective systems and controls to prevent modern slavery or 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 or 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 aspects of our plan for sustainable growth. *'Heathrow 2.0: Connecting People and Planet'*, Heathrow's refreshed plan for sustainable growth is embedded into all procurement processes from sourcing strategies to 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 and contractors working at Heathrow Airport. This policy encourages individuals to report any wrongdoing which extends to slavery or 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 Protocol.

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 Colleagues

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.

We have an immersive e-learning module which will be updated in 2022 to engage Heathrow colleagues on what modern slavery is, why it is 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 online learning and development platform and completion is mandatory.

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.

To support making Heathrow a Responsible Gateway to the UK (a place that strives to end trafficking of people and wildlife), Heathrow works closely with Heathrow Travel Care, the independent airport crisis social work team. As a registered charity, its purpose is to assess, advise and assist anyone in, or potentially in, difficulty at Heathrow Airport, including passengers, colleagues and those who are at the airport for other reasons. This includes supporting colleagues and passengers with concerns relating to modern slavery and human trafficking.

Raising awareness of Modern Slavery and Human Trafficking

During 2021, Heathrow continued to support the A21 Can You See Me campaign, focusing on equipping the public to recognise indicators of human trafficking, and report suspected scenarios. Campaign materials remained on trolleys as well as the arrivals washroom doors.

Our Responsible Business foundations detailed in *Heathrow 2.0*, our plan for sustainable growth, outline the steps taken by Heathrow in 2021 towards preventing modern slavery and human trafficking. These foundations include:

- Modern slavery and human trafficking - 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 or human trafficking very seriously
- Paying the living wage – Heathrow became a Living Wage employer in 2017 and published our London Living Wage roadmap. Since then, we have been working to ensure that all our direct suppliers also pay the living wage, and we will continue to support other Team Heathrow partners to transition
- Responsible procurement – sustainability is built in at all stages of the procurement process so we can ensure that our partners share our values and understand our sustainability ambitions.

Health and safety of workers

Heathrow values the health and safety of colleagues, passengers and anyone else affected by the airport's activities. Keeping people safe is the starting point for how we operate. We have a legal and moral responsibility to ensure that we safeguard the wellbeing of our people, and also of our business partners and the public who may be affected by our activities. Our focus on health and safety is not just the right thing to do, it is the foundation of an efficient operation, a secure airport and a sustainable business.

Supporting suppliers

Heathrow has remained committed to supporting our suppliers by remaining a firm sponsor of the Prompt Payment Code and we encourage our supply chain to adopt Prompt Payment Code practices. As a result of the COVID-19 pandemic our Prompt Payment Code performance took a hit, from 22 days average to 31.2 days in 2021. However, Heathrow is committed to ensuring that we improve our performance to resume pre-pandemic figures.

Grievance procedures

All colleagues have continued to have access to a long-established and well-publicised process of grievance handling. The process, and its supporting policy, are agreed with our Trade Unions and accessible to all colleagues via our HUB+ intranet. Awareness of the process is embedded at all layers of our business.

Our future commitments to combatting Modern Slavery and Human Trafficking

Heathrow is committed to tackling the issue of modern slavery and human trafficking and we recognise our leadership role in working with Heathrow's Business Partners and Team Heathrow to do so. We will keep our focus on the continuous improvement and delivery of effective strategies to meet this important commitment. In early 2022, we published an update to our Heathrow 2.0 sustainability strategy which includes an ongoing focus on tackling modern slavery and human trafficking as one of the foundations which ensure that Heathrow is a responsible business.

Annex 1: Relevant Heathrow Group companies

The following Heathrow Group companies have total turnover in excess of £36 million as of 31 December 2021 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