

Slavery and Human Trafficking Policy Statement

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, which includes 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 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, including:
- 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.
 - There are stringent security requirements including identity verification, referencing and criminal record checks.
 - Work at the Airport is always 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, comply and will continue to comply with the provisions of the Modern Slavery Act 2015. Our approach has been divided into two areas, each with a named individual responsible for monitoring and reporting.

Within the Group

- 2.2 The Group employs over 850 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.
- 2.3 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".
 - Unpaid work experience or internships are closely controlled in liaison with the individual's school, college or university.
 - Appropriate training of relevant staff, tailored to our business by an external provider, is being rolled out.
- 2.4 The Director of People is responsible for ensuring compliance with these requirements.

Within our Contractor & Equipment/Material Supply Chains

- 2.5 BAHL 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 BAHL Group may be investigated and result in a variety of actions, up to and including removal from our supply chain.
- 2.6 We continue to gather Slavery and Human Trafficking Statements from thirty of our new suppliers impacted by the Act,
- 2.7 Within the current financial year BAHL 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.
 - 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 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 & services to BAHL Group companies has been delivered.
- 2.8 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

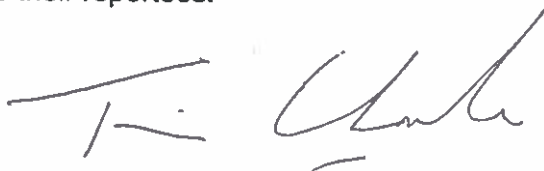
- 5.1 The low risk nature of our business makes measures of performance difficult, but we will continue to benchmark best practice in this area and adopt any appropriate measures.

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.
- 6.2 Company policies and procedures are available on our company intranet.
- 6.3 During 2017 an e-learning module was produced with input from West Midlands Police who provided real life examples of modern slavery incidents that have been reported across the region.

The e-learning module link has been circulated to all departmental heads and rolled out to their reportees.

Signed:



Timothy Clarke
Chairman
Birmingham Airport

04 July 2018

