DocuSign Envelope ID: 4446992C-598D-4B61-ABF9-145952DF0E70

AVIATOR

FARNBOROUGH AIRPORT

MODERN SLAVERY STATEMENT - for the financial year ending 31 December 2022

Farnborough Airport Company Limited, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited

This statement is published in accordance with Section 54 of The Modern Slavery Act 2015.

Introduction

Farnborough Airport Company Limited and its subsidiaries are opposed to slavery, human trafficking and the use of forced labour of any kind. This statement outlines the approaches the company has taken in **2022** to prevent modern slavery and ensure human trafficking is not taking place in our businesses or our supply chains.

Farnborough Airport (the trading name of Farnborough Airport Limited) and the Aviator Hotel (the trading name of Aviator Hotel (Farnborough) Limited) 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.

Business Structure

Farnborough Airport Company Limited operates as a holding company. Through its subsidiaries, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited, 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. Farnborough Airport provides premium services including aircraft handling, hangarage, airport operations and world class passenger facilities and the Aviator Hotel provides an on-site hotel. Together, Farnborough Airport and the Aviator Hotel employ nearly 400 people, including fire and rescue personnel, ground handling staff, engineering and maintenance teams, customer service agents and hotel personnel.

Supply Chains

Farnborough Airport and the Aviator Hotel have, in aggregate, in the region of 815 suppliers providing a variety of goods and services including:

- finance and banking;
- IT and telecommunications;
- employment, recruitment and employee benefits;
- facilities, office and operational services (including cleaning, catering, security, facilities management and transport);
- food and beverages;
- information services and knowledge management; and
- media, marketing, promotions and events.

More than 98% of these suppliers are based in the UK, and the remainder are from Europe (1.5%) and, much less significantly, the USA (0.5%).

The majority of Farnborough Airport's suppliers are delivering services, with only a small proportion providing goods beyond typical off the shelf products. Whereas the Aviator Hotel has a large number of suppliers in their food and beverage supply chain as they increasingly move to local suppliers. The teams actively visit supplier premises to assess quality where possible.

Proportionally, there are fewer suppliers with an annual turnover greater than £36 million which would trigger the compliance requirements of the Modern Slavery Act 2015 (the **Act**), requiring them to produce a Modern Slavery Statement. It is recognised that suppliers under this threshold can still be a risk and therefore they are still assessed through our onboarding process and rigorous checks.

Modern Slavery in our Business

We continue to improve our practices to identify and eliminate modern slavery which may occur within our businesses, supply chains and across our airport and hotel operations. Our procurement function continues to mature, embedding the policies and processes introduced in 2021 ensuring:

- all suppliers are requested to respond to a number of CSR questions as part of the tender process, including several relating to modern slavery; or
- where suppliers are engaged out with a tender process, they are invited to complete a new supplier form, which includes a modern slavery section to satisfy the requirements in respect of the Act.
- the procurement team reviews the responses to determine whether there are any risks associated with the response, assesses the suitability of the supplier and any steps required to manage the modern slavery risk based on the responses provided.
- that if the supplier responses highlight anything of concern or any subsequent questioning fails to provide appropriate evidence and reassurance, the supplier would not be progressed any further.
- new contracts include appropriate obligations in relation to the Act and the ability to terminate in the event of a breach.

Our pre-employment screening processes were tightened further in 2022 to ensure that no job offer is made until all Right to Work and reference checks are completed as appropriate.

Anyone entering the airport site is required to produce the appropriate ID, and our security teams have the right to perform random searches of vehicles to ensure no trafficked people are hidden within them.

We are committed to preventing Farnborough Airport and the Aviator Hotel from being used as an entry or exit point for human trafficking.

DocuSign Envelope ID: 4446992C-598D-4B61-ABF9-145952DF0E70

Company Policies

The following policies are 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.

Our policies are reviewed regularly by the responsible person and also by independent legal counsel in 2022.

Risk Assessment and Due Diligence

Our review of our supply chain by country, sector, transaction, and business partnership for modern slavery risks is likely to become an ongoing process, acknowledging that supply chains can evolve quickly as we have seen in recent times due to Covid. Our review of our suppliers locations, and the goods/services supplied to us, suggests the large majority of our suppliers are "low risk".

We will improve our supplier management process, specifically looking at how we manage and maintain supplier information and we will specifically assess the slavery and human trafficking risks arising in each category area. From that review, we will identify and take appropriate steps to address those risks, which may include placing appropriate contractual obligations on suppliers, audits, 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 2022 there were no reported cases of Modern Slavery and Human Trafficking within our airport or hotel business. 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

DocuSign Envelope ID: 4446992C-598D-4B61-ABF9-145952DF0E70

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

Our People Team introduced a new training course to ensure all employees are trained appropriately to identify likely situations and individuals who may be being trafficked and report these situations through appropriate channels. 100% of our employees completed the training in 2022 and this will be an annual occurrence.

Planned development of our Modern Slavery programme

In the coming year we are committed to:

- introducing a supplier record management process and application, intended to assess our suppliers during their initial onboarding but also periodically throughout their contractual relationship with us; and
- continuing to raise awareness through recurrent and induction training for employees.

Measure our progress

Percentage of employees who have participated in modern slavery training
Percentage of suppliers signed up to the Supplier Code of Conduct
Percentage of new suppliers engaged for more detailed conversations where the risk of modern slavery is higher based on their location and/or goods they provide

The Modern Slavery Act 2015 – Transparency in Supply Chain statement

This statement is made on behalf of **Farnborough Airport Company Limited and certain of its subsidiary companies, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited** in accordance with the obligation to make a modern slavery statement (Statement) under s54(1) of the Modern Slavery Act 2015 and was approved by the by the boards of directors of each of Farnborough Airport Company Limited, Farnborough Airport Limited, and Aviator Hotel (Farnborough) Limited on 9 May 2023.

DocuSigned by:
Signed: Simon Geere
A54B02ED206D42D... Dated: 9 May 2023

Simon Geere

Director of Farnborough Airport Company Limited

and

AVIATOR

FARNBOROUGH AIRPORT

Signed: DocuSigned by: Robert Marsden 9AB70A6B661748C... Dated: 9 May 2023

Robert Marsden

as attorney for Farnborough Airport Company Limited under a power of attorney dated 30 January 2023

Signed: DocuSigned by: Simon Geere A54B02ED206D42D... Dated: 9 May 2023

Simon Geere

Director of Farnborough Airport Limited

and

Signed: DocuSigned by: Robert Marsden 9AB70A6B661748C... Dated: 9 May 2023

Robert Marsden

as attorney for Farnborough Airport Limited under a power of attorney dated 30 January 2023

Signed: DocuSigned by: Simon Geere A54B02ED206D42D... Dated: 9 May 2023

Simon Geere

Director of Aviator Hotel (Farnborough) Limited

and

Signed: DocuSigned by: Robert Marsden 9AB70A6B661748C... Dated: 9 May 2023

Robert Marsden

as attorney for Aviator Hotel (Farnborough) Limited under a power of attorney dated 30 January 2023