**Farnborough Airport Company Limited**

**Farnborough Airport Limited**

**Aviator Hotel (Farnborough) Limited**

# MODERN SLAVERY STATEMENT

For the year ended 31 December 2024

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# MODERN SLAVERY STATEMENT
For the year ended 31 December 2024

## Introduction

At the Farnborough Airport Company Limited, we recognise our responsibility to ensure that slavery and human trafficking are not occurring in any part of our business or supply chain, and we are committed to the prevention of both across our operation. Whilst we have not identified any significant risks related to modern slavery, we remain vigilant in our commitment to upholding human rights and ensuring that our operations continue to reflect ethical practices. In compliance with the Modern Slavery Act 2015, this statement outlines the steps we continue to take to assess and mitigate any potential risks,

We have improved our approach to risk mitigation in our operation and supply chain and now include risk assessments to identify and prioritise areas where the risk of modern slavery may be higher. This includes evaluating suppliers, geographical regions, and industry sectors known for heightened vulnerability.

In addition, we actively engage with our suppliers to communicate our expectations regarding ethical conduct and compliance with anti-slavery laws and regulations. Through open dialogue and collaboration, we have worked to foster a shared commitment to combatting modern slavery.

As a matter of course we continuously review and enhance our approach to due diligence within our supply chain so that we can adapt to the evolving risks, regulations and best practice. As such we remain committed to driving continuous improvement and innovation across our activities in this regard.

We also consistently reassess the training that we provide, and we actively promote initiatives amongst our staff and key suppliers to raise awareness and understanding of modern slavery risks. This includes training on recognising the signs of exploitation, awareness around the types of reporting mechanisms, and highlighting the importance of ethical sourcing practices.

By implementing these measures, we strive to ensure that our operations and supply chains remain free from modern slavery and human trafficking.

This statement has been developed and published in accordance with Section 54 of the Modern Slavery Act 2015 and covers the financial year ending 31 December 2024, having been approved by the company's Board of Directors on 25 April 2025.



Simon Geere, Chief Executive
Farnborough Airport Company Limited.

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## Our Business

Farnborough Airport Company Limited operates as a holding company. Through its subsidiaries, Farnborough Airport Limited and Aviator Hotel (Farnborough) Limited, the company operates a business aviation airport and an on-site hotel.

Together, Farnborough Airport (the Airport) and the Aviator Hotel (the Hotel) employ approximately 400 people, including fire and rescue personnel, ground handling staff, engineering and maintenance teams, customer service agents and hotel personnel.

## Progress

Since 2023, Farnborough Airport and Aviator Hotel have taken the following steps to ensure we maintain a responsible and ethical approach to modern slavery and human trafficking.

## Risk Management

As an Airport and Hotel business, we recognise that our primary risks may lie within our supply chain, particularly in the procurement of services such as cleaning, catering, security, and transport. Based on our assessments, we do not expect modern slavery or human trafficking to be a significant issue within our core operation, however we continue to monitor our supply chains and employee practices to ensure compliance with ethical labour standards.

We conduct regular risk assessments and audits to ensure that we continue to meet compliance requirements and address any new or emerging risks. We engage with external auditors on occasion to evaluate our internal controls and confirm that our processes meet industry standards. We recognise the importance of continuous improvement and will adapt our approach as necessary to maintain compliance and address potential risks in a timely manner.

## Collaborative Partnerships

Human trafficking is an inherent risk for an Airport and Hotel business, and it therefore requires collaboration with a number of regulatory and law enforcement authorities including Border Force.

It also requires strict adherence to security protocols and measures to mitigate potential vulnerabilities that could be exploited by traffickers or smugglers. Our regular risk reviews have confirmed that our controls are effective and proactive measures are being identified to address emerging challenges.

Working with a number of control authorities we coordinate our efforts to intercept potential traffickers, rescue their victims and actively combat smuggling threats. Through this collaborative approach we are able to ensure that a responsible and ethical approach to modern slavery and human trafficking is upheld.

## Supply Chain

Whilst we have not identified any significant modern slavery-related issues within our supply chains, we continue to apply due diligence processes to assess our suppliers. We require transparency regarding the origins of goods and services, and in addition we assess suppliers' compliance with human rights practices and labour conditions.

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We continue to engage with suppliers to ensure they align with our ethical standards. If any concerns arise, we will take appropriate steps, including working with suppliers to improve practices or where necessary, we shall sever our ties.

As part of our existing process, we review our supply chain by country, sector, transaction and business partnership for modern slavery risks. A review of our suppliers' locations, and the goods/services supplied to us, indicate that the large majority of our suppliers are "low risk".

By taking these actions we aim to identify and take appropriate steps to address potential risks, which may include placing appropriate contractual obligations on suppliers, undertaking ad-hoc assessments, working with suppliers to make improvements, or ceasing to work with suppliers entirely.

Currently, the Airport and the Hotel have in the region of 800 suppliers providing a variety of goods and services including:

- Finance, banking, IT, telecommunications, media, marketing, promotions and events,
- Employment, recruitment, and employee benefits,
- Facilities, office, and operational services (including cleaning, catering, security, facilities management, fuel supplies and transport),
- Food and beverages,
- Information services and knowledge management.

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

The majority of the Airport's suppliers are delivering services, with only a small proportion providing goods beyond typical off-the-shelf products. Whereas the Hotel has a large number of suppliers in their food and beverage supply chain, however they are increasingly using local suppliers which means that we can visit supplier premises to assess potential risk.

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 however recognised that suppliers under this threshold can still be a risk and therefore they are still assessed through our onboarding process and rigorous checks.

Moreover, we continue to improve due diligence in our supply chains to manage risks in relation to modern slavery and human trafficking, in particular our procurement processes are focused in those areas which carry the most impact in preventing modern slavery risk.

All procurement policies, strategies and procedures are structured to support strategic level compliance standards, as well as operational level delivery and impact within our supply chains.

Within our procurement activities we continue to embed these policies and processes to ensure suppliers are thoroughly assessed, making sure they adhere to ethical labour practices and do not engage in exploitative activities. This involves:

- Requesting all Airport suppliers to respond to CSR questions as part of the

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Procurement tender process;

- As part of this process they are invited to complete a new supplier form, which includes a modern slavery section;
- A thorough review of responses is undertaken to determine whether there are any associated risks;
- The suitability of the supplier is also assessed with any steps required to manage the modern slavery risk based on the supplier responses then identified;
- Where a supplier's response highlights a potential area of concern or any subsequent questioning fails to provide appropriate evidence and reassurance, the supplier would not be progressed any further; and
- Ensuring all contracts include appropriate obligations in relation to the Act and the ability to terminate in the event of a breach.

We are exploring options for improved monitoring and assessment of slavery and human trafficking risks as our supplier base evolves over time.

## Employment Practices and Training

Our pre-employment screening procedures include comprehensive background checks, verifying the identity, employment history, and relevant qualifications of all prospective employees. These measures help to ensure that individuals with potential links to human trafficking or exploitation are identified.

All Airport and Hotel staff receive mandatory Modern Slavery and Whistleblowing training both when they join and on an annual basis thereafter. The training explains the various types of Modern Slavery and Human Trafficking. This training is periodically refreshed to ensure all employees understand how to identify and report any concerns related to exploitation or human trafficking. Also, we ensure that they remain up to date with Modern Slavery legislation to identify and prevent instances of modern slavery within our supply chains.

In addition to addressing modern slavery in our modern slavery statement, the Airport and Hotel businesses also have specific policies which cover:

- Modern Slavery
- Procurement
- Whistleblowing
- Anti-bribery and Corruption.

We also proactively identify and address any potential instances of exploitation or misconduct in the workplace through regular inspections of workplace conditions.

Whilst we have not had any reports of modern slavery or related concerns, we maintain a confidential whistleblowing system, detailed in our Whistleblowing Policy, to allow staff and contractors to report any suspicions in a safe and protected environment. This includes encouraging individuals to report concerns promptly by using designated reporting channels, as well as giving them the confidence that their concerns will be investigated confidentiality by ensuring measures are in place to protect whistleblowers from retaliation or victimisation.

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We believe the current level of risk within the business among our colleagues is low. This is due to the highly regulated nature of our business, which requires robust and extensive pre-employment checks and ongoing 'in employment' checks for certain positions.

Employment practices and training play a pivotal role in our commitment to tackle modern slavery within our Airport and Hotel community. Furthermore, these activities provide the necessary resources and reporting mechanism for staff to understand the importance of combating modern slavery and human trafficking.

## Governance

We recognise that modern slavery is a constantly evolving area and therefore it is important to continue to develop and strengthen our strategy and capabilities accordingly.

Our Key Performance Indicators (KPIs) capture and enable monitoring of progress against our strategy. We currently measure our progress on modern slavery and whistleblowing through:

- Percentage of employees untrained/expired Modern Slavery and Whistleblowing training.
- Feedback from employees on the effectiveness of training and awareness initiatives.
- Number of concerns raised regarding modern slavery or human trafficking allegations by employees or contractors.
- Percentage of new suppliers assessed appropriately based on their industry, location and likelihood of vulnerable groups.

These KPIs are monitored at quarterly management review meetings.

## Strategic Priorities for 2025

Looking ahead to 2025, we will continue to:

## Supply Chain

Refine our supplier onboarding and monitoring process, with a focus on supply chain areas where we see potential risk of modern slavery and continue to explore a systematic approach to enhance transparency and efficiency of our supplier processes.

## People

Continue training efforts to ensure employees and suppliers understand the signs of modern slavery and human trafficking. Identify any other roles that may require additional training on modern slavery and human trafficking.

## Governance

Monitor emerging risks in both our Airport and Hotel business to ensure we remain aligned with best practices and compliant with legislation.

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