Leeds Bradford Airport
From the heart of Yorkshire

# Modern Slavery Statement

October 2024

Leeds Bradford Airport (**LBA**) has a zero tolerance of modern slavery and human trafficking and is committed to improving our practices to combat slavery and human trafficking in our business and supply chain. We are cognisant of the importance of aligning our business goals with the needs of society, and to make a positive social impact by investing in the communities in which we operate, embracing diversity through culture and people practices, and being committed to doing business in an environmentally sustainable way. These actions are all part of a personal and collective responsibility we take very seriously.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

LBA is committed to conducting business with integrity and to the highest ethical standards, respecting human rights and protecting the interests of both our employees and society. We expect the same from everyone we do business with and will not knowingly engage with any person or organisation suspected of being involved in modern slavery or human trafficking in any form. We are a main port of entry into the UK, and therefore human trafficking through our airport is a risk within our business and one we wish to manage responsibly.

LBA is committed to:

- acting ethically and with integrity in all our business dealings and relationships;
- implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains; and
- ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**).

## Our business

International Airport Bidco Limited is the parent company of the LBA group of companies (**Group**). The companies within the Group include Leeds Bradford Airport Limited and LBA Services Limited. This statement is made on behalf of all companies within the Group.

The ultimate owner of the Group is InfraBridge, a division of DigitalBridge which is a global investment management firm.

LBA is an international gateway airport to more than 80 destinations principally across Europe serving the wide catchment of Yorkshire and surrounding areas. LBA is home to the largest catchment area in the UK outside of London, is the 15th busiest airport in the UK and is anticipating handling close to 4.5m passengers in the financial year April 24 to March 25 and onwards to 7m passengers by 2030.

## Our supply chain

Our supply chain includes companies providing the services, supplies and works required to run an international airport. We require our suppliers to comply with the Act. Many of our suppliers are obliged to issue their own modern slavery statement under the Act. We also require our suppliers to attend supplier review meetings where any compliance issues can be raised by either party. Suppliers are asked to provide a statement of compliance on our request.

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Suppliers are to report any incidents of actual or suspected human trafficking in their supply chains and are subject to audit at any time.

Any new contracts we enter into with operators at the airport, including retail concessionaires, are subject to the same obligations set out above.

## Governance

In 2024, LBA formed a Board level ESG Committee which oversees LBA's commitment and progress to combat slavery and human trafficking in our business and supply chain. The Committee meets three times a year. In 2023, LBA recruited a General Counsel and Company Secretary, a member of the Executive team and reporting directly to LBA's Chief Executive Officer. This role is responsible for the day-to-day implementation of our commitment to respecting human rights.

## Policies and procedures

Our policies reflect our commitment stated above, namely: acting ethically and with integrity in all our business relationships, implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains, and ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

The following policies incorporate the values and objectives of the Act:

1. Modern Slavery Policy: This policy sets out the responsibilities of employees (and those working on behalf of and/or contracted by LBA) on observing and upholding LBA's zero tolerance approach on modern slavery and human trafficking. It confirms our commitment to acting ethically and with integrity in all our business dealings and relationships and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere within LBA or any of LBA's supply chains.

2. Supplier Code of Conduct: Our Supplier Code of Conduct is publicly available on our website and clearly states that our suppliers must conduct their business with honesty and integrity, upholding our high standards to protect their employees and workers. It applies to anyone LBA does business with, whether internal or external, and sets out the principles to apply in daily work.

3. LBA Code of Conduct: This applies to all directors, managers, executives and employees and set out what is and what is not acceptable behaviour within LBA. Our Code of Conduct reinforces that we treat everyone with dignity and respect and reiterates LBA's commitment to adhering to human rights legislation.

4. Whistleblowing Policy: This encourages employees to raise, in confidence, any concerns they may have about a suspected wrongdoing in the workplace which includes any concerns regarding the risk of modern slavery or human trafficking. The policy applies to all employees as well as contractors and consultants and provides an independent and confidential route for reporting any concerns in the workplace.

5. Grievance Policy: The policy provides a supportive framework and an additional route for employees wishing to raise any workplace problems, complaints or concerns including concerns

involving discrimination, harassment or victimisation and raises awareness of the Safecall independent whistleblowing helpline.

6. Anti-Bribery & Corruption Policy: This policy reiterates our position of conducting our business to the highest legal and ethical standard.

7. Our Equality, Diversity and Inclusion Policy: This sets out LBA's commitment in providing equal opportunities in employment and avoiding unlawful discrimination in employment and against customers.

8. Anti-Harassment and Anti-Bullying Policy: This policy details our commitment to creating a positive and welcoming work environment free of harassment or bullying, where everyone can achieve their potential. It reminds employees of their responsibilities in this regard and refers to use of our grievance policy to raise a complaint or concern.

We continue to enforce our values – 'one team', 'be the best' and 'do the right thing'. Various activities have taken place to ensure these values remain at the forefront of everything we do at LBA, including incorporating them into our recruitment and performance management processes, recognition schemes, and merchandise and visual displays across the airport.

We run an annual employee survey where we give all staff the opportunity to give feedback on their experience at work, including the inclusivity of our workplace, and how well the company values are embedded.

## Steps taken to comply with the Act

As part of our initiatives to identify and mitigate risk we carry out the following:

1. **Procurement**
   Our standard supplier agreement templates include modern slavery and human trafficking warranties and undertakings, which we continue to review and strengthen where necessary. Pursuant to these terms, we make it incumbent upon our suppliers to respect and comply with all applicable laws, including the Act, and we reserve the right to terminate our commercial partnership with any supplier who is found to be in breach of, or who fails to comply with the Act.

   All tenders and procurement processes with potential suppliers include statements to a similar effect.

   We also have a Supplier Code of Conduct which is publicly available on our website and clearly states that our suppliers "must have zero tolerance of modern slavery and human trafficking and ensure that no form of modern slavery or human trafficking exists within their supply chain. This includes not engaging with any person or organisation suspected of being involved with, or using any form of, forced, bonded or compulsory labour."

2. **Staff**
   Employees and suppliers that work on our premises are subject to stringent security verification of their identity, background and/or criminal record checks. For recruitment purposes we operate a digital applicant tracking system and assure the highest standards of pre-employment screening

including face to face interviews, a detailed five-year history, right to work documents and criminal record checks.

All employees of LBA have a written contract of employment that is compliant with the Act, and we ensure that all pay and conditions of our direct employees are of a high standard, above those stipulated in the Act. The Company Handbook details LBA's values to existing and new employees and underlines our commitment to Diversity and Inclusion. A new behavioural framework to support LBA's values has also recently been launched.

3. **Entry into the UK**
   Our Customer Experience team work closely with UK Border Force at the airport on modern slavery, often supporting conversations with minors and vulnerable adults when necessary. UK Border Force at the airport conduct their own activities with relevant bodies which we input to.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

LBA's CEO has also communicated to all staff within LBA's key corporate functions about the need to be vigilant about LBA's obligations under the Act when procuring goods and services. LBA's CEO and Executive team take their responsibilities under the Act seriously.

## Our effectiveness in combating slavery and human trafficking

The effectiveness of the steps taken by LBA to ensure that modern slavery and human trafficking is not taking place in any part of our business and within its supply chain will continue to be measured by the following key performance indicators (KPIs):

1. The number of instances of modern slavery and human trafficking identified as part of our supplier due diligence process.

2. The number of instances of reports being received from employees, the public or law enforcement agencies that modern slavery and human trafficking practices have been identified within the Group.

## Next steps

The activities and efforts described above reflect our ongoing efforts to ensure there is no modern slavery or human trafficking in our supply chain and business. We intend to continue to review and monitor and, where necessary, enhance our systems, policies and procedures, as well as improve our training and communications about the Act across our business.

1. We will procure and implement a supplier due diligence tool, requiring all suppliers to submit information and complete questionnaires confirming they meet the standards required to be an LBA supplier, including confirmation from each supplier that they will comply with human rights and modern slavery laws and have the tools and policies in place to identify and mitigate the risk of human trafficking and slavery in their operation and supply chain. This is to ensure that LBA only engages with those suppliers who share and are fully aligned with our values and principles. Risks will be monitored and reviewed for all suppliers, new and existing.

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2. We will launch an online training platform for all LBA staff and new starters containing a suite of mandatory training and policy compliance that staff will undertake yearly, which will be monitored by LBA. The content will include modules covering modern slavery, whistleblowing and our Code of Conduct, as well as education on Diversity and Inclusion and appropriate standards of behaviour. Completion rates of training will be monitored.

3. We will partner with a charity supporting victims of human trafficking to provide training for our front-line employees. We will also seek to increase awareness of modern slavery in both our employees and passengers through working with LBA's charity partner.

4. We will work with West Yorkshire Police and UK Border Force in supporting initiatives to eradicate modern slavery and help those in need.

5. We will continue to grow our Diversity & Inclusion Champions network to promote awareness of inclusion topics across LBA, organising events and partnering with local organisations.

6. We will continue to review relevant employment policies throughout 2024 to ensure inclusivity and fairness.

7. We will implement Diversity, Equality and Inclusion Training to help achieve our objectives of a more equal, diverse and inclusive workplace. This will be rolled out via our online learning platform and be available for all staff.

8. We will continue to develop and ensure compliance of our procurement policy which sets out LBA's ethics of striving to purchase goods and services that are produced and delivered under conditions which do not involve abuse or exploitation.

## Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2024. It was approved by the Board of Directors on 22 October 2024.

Signed by



**Vincent Hodder**
Chief Executive Officer