

Heathrow

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2024





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## INTRODUCTION



Heathrow's ninth Modern Slavery Statement (the "Statement") is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2024.

It sets out the steps we have taken to prevent modern slavery and human trafficking from occurring in our own operations and our supply chain. It has been approved by the Board of Directors of Heathrow Airport Holdings Limited ("Heathrow") on 28 May 2025 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 28 May 2025.



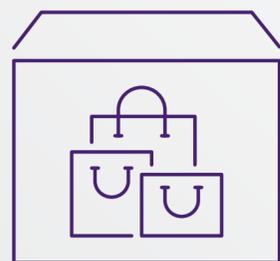
*At Heathrow, doing the right thing remains a core value that guides our decisions and actions. We recognise our responsibility to identify, prevent and address risks related to modern slavery across our business and supply chain. Building on the progress made last year, we have continued to strengthen our approach in 2024—applying the insights from the independent review we commissioned in 2023, and taking forward its recommendations. This year's statement reflects the steps we've taken and outlines our ongoing commitment to continuous improvement. We remain focused on working closely with our partners, suppliers and stakeholders to help ensure that everyone connected to our operations is treated with fairness, dignity and respect."*

THOMAS WOLDBYE  
Chief Executive Officer

# ABOUT HEATHROW

Heathrow is 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 global destinations, Heathrow enables businesses to reach markets around the world. The airport supports trade, attracts foreign investment into the UK and brings overseas visitors to the UK's shores.



**330+**  
RETAIL UNITS

**70+**  
RETAIL BUSINESS PARTNERS



**83.9** MILLION  
passengers served in 2024

**80**  
PASSENGER AIRLINES



**70+**  
FOOD AND BEVERAGE UNITS



**1,600+**

ADVERTISING SITES



**80,000**  
people working across

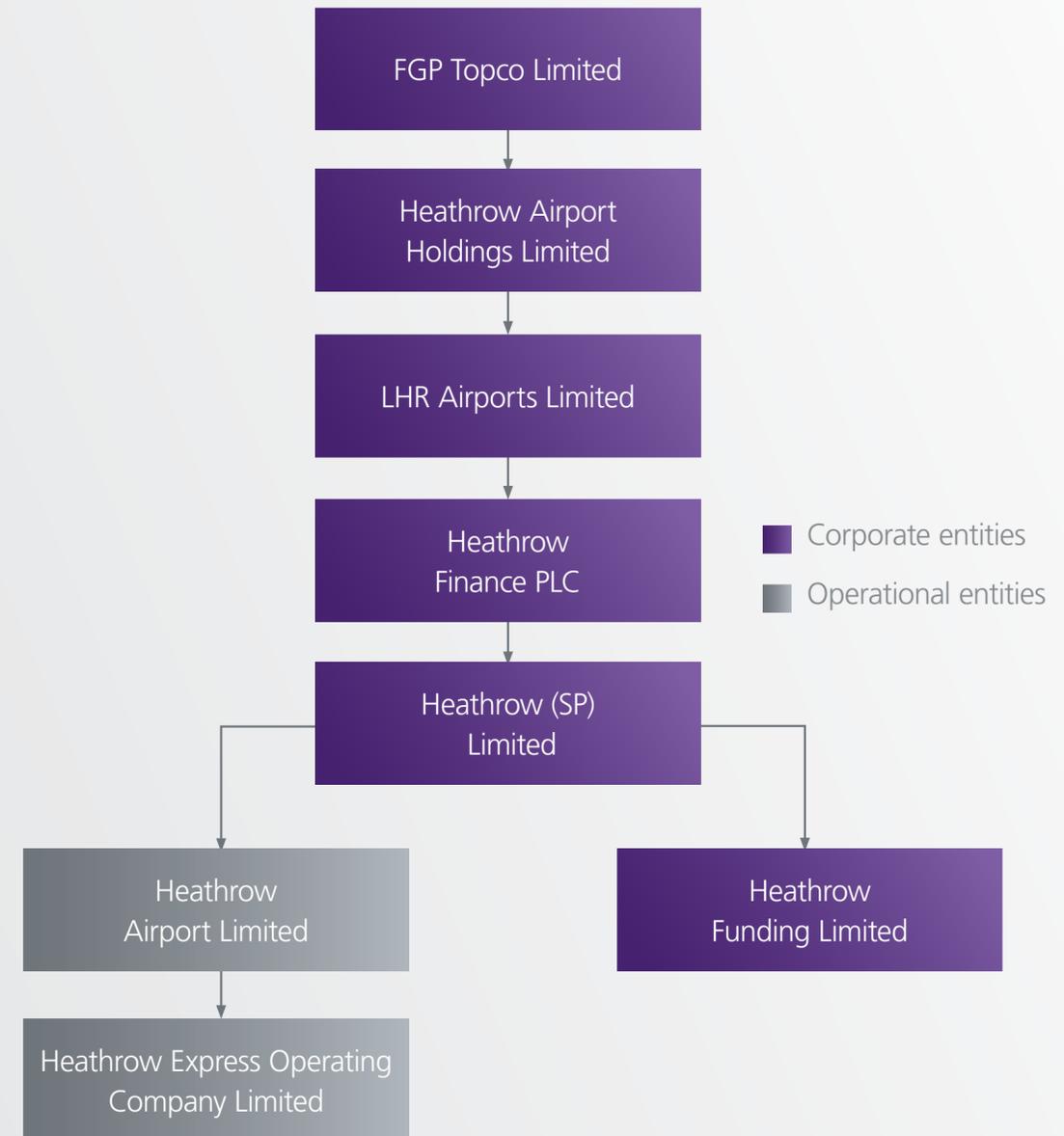


**234**  
DESTINATIONS SERVED

## CORPORATE STRUCTURE

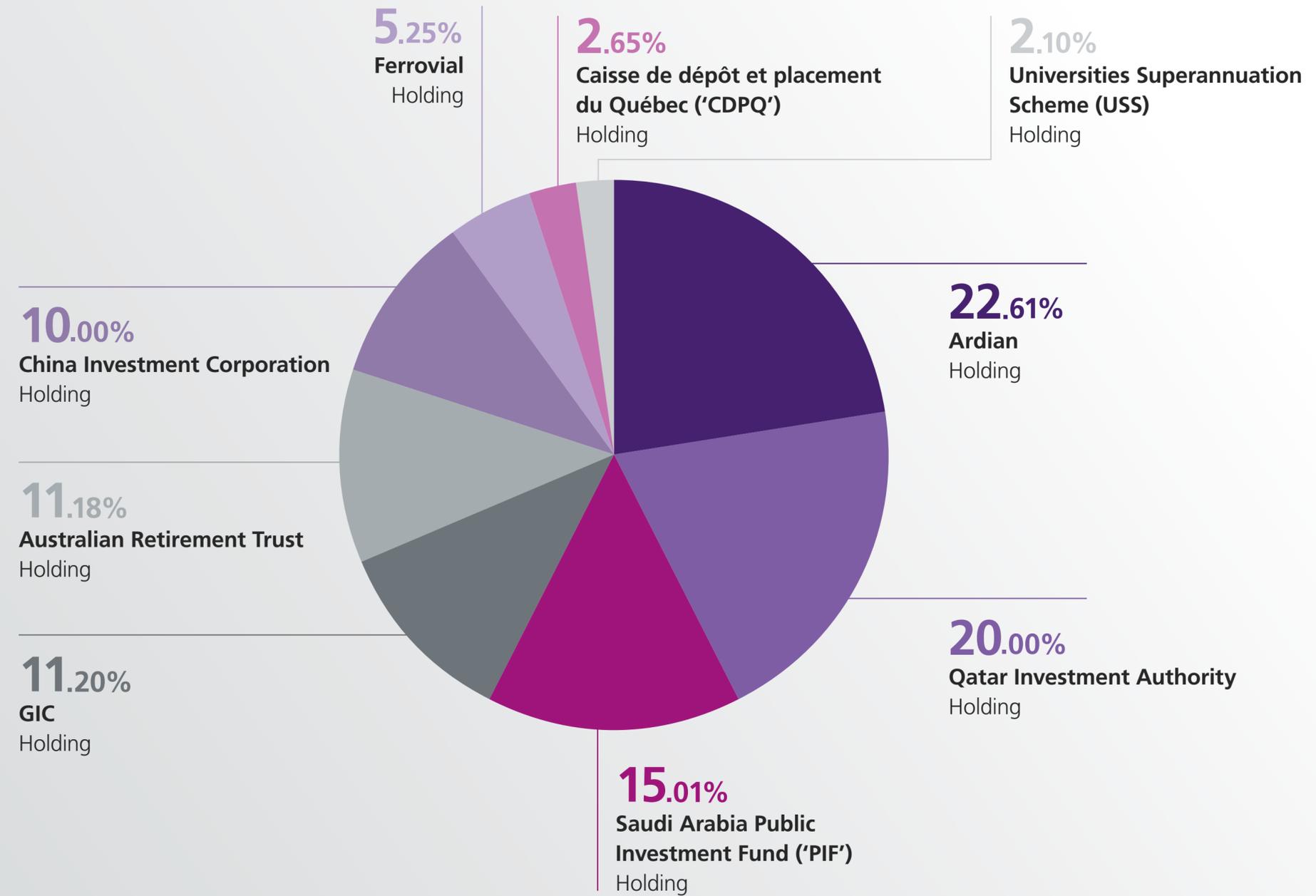
Heathrow Airport Holdings Limited (the 'Company' or 'HAHL') is the holding company of a group of companies that owns Heathrow Airport and operates the Heathrow Express Rail Service (the 'HAHL Group').

The Board of Directors of HAHL determines the long-term strategy of the HAHL Group, ensuring that it acts ethically, has the necessary resources to meet its objectives, monitors performance, and meets its responsibilities as a major airport group. The ultimate parent company of the HAHL Group is FGP Topco Limited. A simplified structure of FGP Topco Limited and its subsidiaries is illustrated in the diagram opposite.



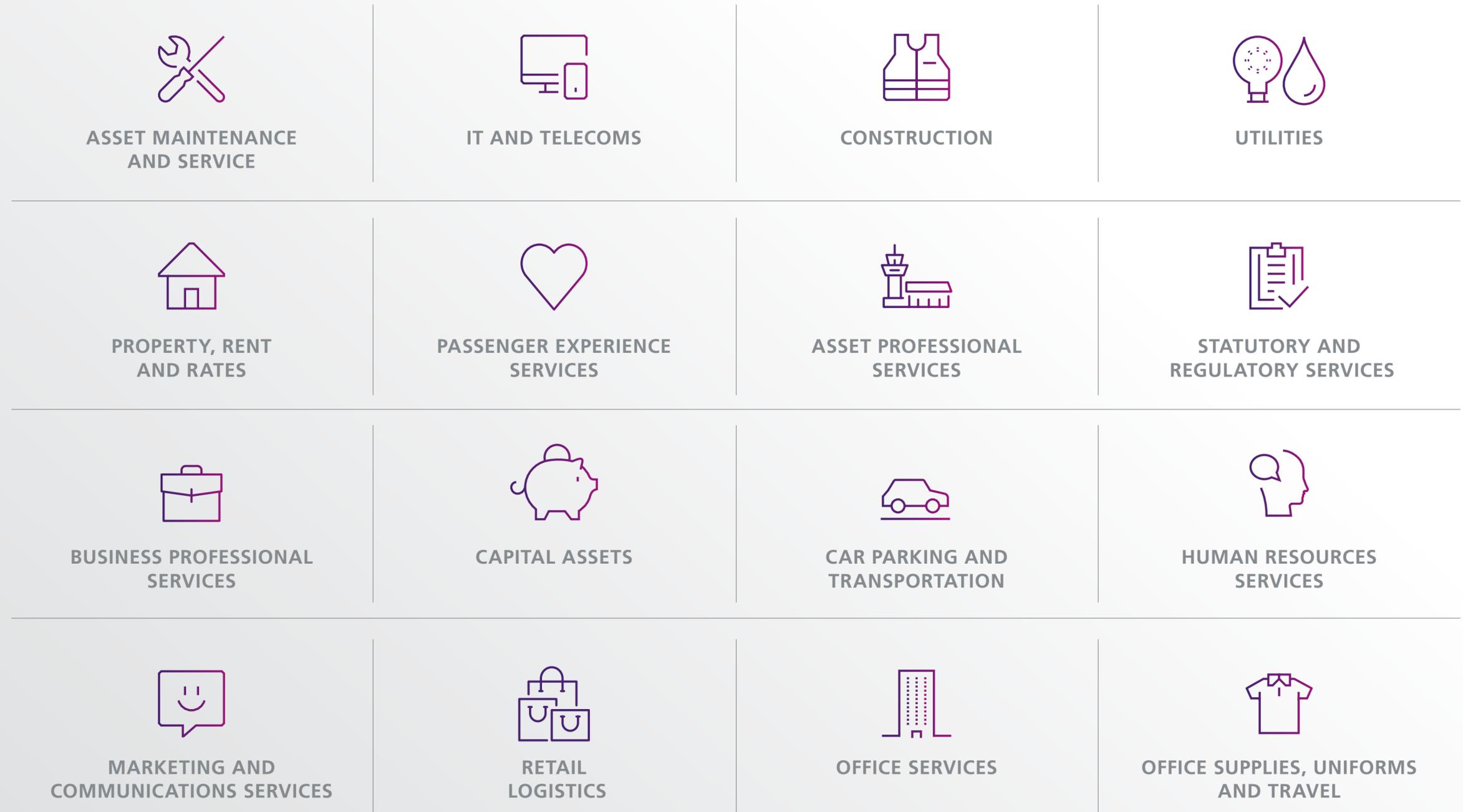
## OWNERSHIP

The HAHL Group is owned by a consortium of investors (the 'Shareholders') who hold shares in FGP Topco Limited. Details of the Shareholders' equity interests, as at 31 December 2024, are shown in the chart opposite.



## OUR SUPPLY CHAIN

Heathrow's operation is enabled by our comprehensive supply chain, encompassing a range of products and services across multiple industry sectors. In 2024, we were supported by over 1,636 suppliers, with 1,499 of these headquartered in the UK. Our suppliers are spread across the following categories:



# GOVERNANCE AND POLICIES

## GOVERNANCE STRUCTURE

Heathrow has implemented a robust top-down governance structure to manage modern slavery risk. Ultimate accountability sits with the HAHL Board. The airport also has a suite of policies that guide our approach to managing modern slavery and mitigating risk within our operations and supply chain.

Oversight of modern slavery sits with the Environment, Social, Governance (ESG) Committee, which was formed in 2023. Strategic decision making and risks and opportunities associated with wider sustainability topics - including modern slavery - are discussed at bi-monthly meetings. Individuals within Heathrow's management team also engage with industry and drive formation of action plans that are aligned with industry best practice.

Functional groups with Director-level sponsorship are responsible for delivering strategic and day to day workstreams, as well as working with partner agencies and suppliers to manage modern slavery risk.



## GOVERNANCE AND POLICIES *cont.*

### POLICIES

POLICY	CURRENT STANDING AND PROGRESS
<b>Professional Conduct</b>	<ul style="list-style-type: none"> <li>• Sets out requirement for Heathrow and our colleagues to operate within laws and professional standards, including those pertaining to modern slavery in employment and supply chain dealings.</li> <li>• Requires compliance with the internal governance processes through which corporate operations and decision making occurs.</li> </ul>
<b>Recruitment and Secondment for Heathrow Airport Limited</b>	<ul style="list-style-type: none"> <li>• Sets out Heathrow's commitment to ensuring that due process is followed during the recruitment process. This ensures that key criteria including right-to-work and any necessary background checks are undertaken to mitigate risk of exploitation and modern slavery risk.</li> </ul>
<b>Modern Slavery</b>	<ul style="list-style-type: none"> <li>• Sets out Heathrow's approach to maintaining and enforcing effective systems and controls to prevent modern slavery and human trafficking within our business and supply chain.</li> <li>• Clarifies each individual's role in complying with applicable laws and safeguarding vulnerable persons against modern slavery and human trafficking.</li> <li>• Provides clear guidance explaining the concepts of modern slavery and human trafficking, and what needs to be done if an individual suspects modern slavery or human trafficking is taking place at Heathrow Airport or in our supply chain.</li> <li>• Makes it clear that Heathrow expects our 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.</li> <li>• Includes a statement confirming that Heathrow will not tolerate modern slavery or human trafficking at any tier in our supply chain.</li> <li>• 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 to tackle modern slavery.</li> </ul>
<b>Sustainable Procurement</b>	<ul style="list-style-type: none"> <li>• Governs how we purchase the products and services we buy, the organisations we do business with, and the contracts that we manage.</li> <li>• 'Heathrow 2.0: Connecting People and Planet', Heathrow's refreshed sustainability plan is embedded into all procurement processes from sourcing strategies to tenders, evaluations, contract clauses and KPIs.</li> </ul>
<b>Whistleblowing</b>	<ul style="list-style-type: none"> <li>• Aimed at our colleagues (permanent or temporary) and applies to all Heathrow Business Partners working at Heathrow Airport.</li> <li>• This policy encourages individuals to report any wrongdoing which would include slavery or human trafficking.</li> <li>• 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.</li> </ul>

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## RISK IDENTIFICATION AND MITIGATION

Connecting People and Planet is our sustainability strategy. It includes an ongoing focus on tackling modern slavery and human trafficking as one of the foundations which ensure that Heathrow is a responsible business.

Heathrow's 'Risk and Assurance Management Framework' is a comprehensive enterprise risk management system aimed at overseeing and governing the key risks faced by the organisation, including modern slavery. It guides the identification, mitigation, review, and reporting of risks throughout Heathrow. The framework undergoes continuous evolution to enhance data quality, completeness of risk information, control measurement, and overall reporting integrity.

Heathrow recognises the diverse range of modern slavery risk relevant to an international hub airport. The core areas of focus are our own operations, our workforce and our supply chain.



## RISK IDENTIFICATION AND MITIGATION *cont.*

### OPERATIONS

With 83.9 million passengers in 2024 Heathrow is one of the busiest international airports in the world, serving as a major transit hub for travelers from diverse backgrounds. This high volume of passengers and connections poses a risk from human traffickers seeking to exploit individuals and the potential for modern slavery to arise.



### RISK MANAGEMENT

Heathrow is committed to being a responsible gateway, striving to end trafficking of people and wildlife. To support this, Heathrow supports [Heathrow Travel Care](#), an independent crisis social work team based at the airport. As a registered charity, its purpose is to evaluate, counsel, and aid anyone who may be in trouble at Heathrow Airport. This includes passengers, colleagues, and others present at the airport for various reasons. Their support extends to those with concerns about modern slavery and human trafficking.

Heathrow Travel Care attends the Joint Strategic Safeguarding & Trafficking Group (JSSAT) which ensures that children and vulnerable adults are safeguarded from the point of entering the London Borough of Hillingdon at Heathrow.

There is also Operation Limelight – a Police-led multi-agency safeguarding operation focusing on flights in which passengers may be at increased risk of prominent elements of modern slavery including female genital mutilation (FGM), forced labour and travel for other involuntary reasons.

To raise awareness among passengers, during 2024 Heathrow continued to maintain our support for the A21 'Can You See Me' initiative, which concentrates on empowering the public to identify signs of human trafficking and report any suspicions. Promotional materials for the campaign were kept on trolleys and the backs of doors in arrivals bathrooms.

Heathrow's chaplaincy service also plays an active role by assisting in taking the role of responsible adults when cases of modern slavery are suspected at the border.

Additionally, Heathrow's security officers continue to receive specialised training to identify instances of modern slavery within the Airport's operation and to manage it accordingly. More information is available on this training in the Training and Capacity Building Section of this statement.

Heathrow receives information about the number of reports logged to police regarding a range of incidents at the airport. Due to the method of the information capture process involved, it is not possible to differentiate and report on specific numbers of modern slavery occurrences at Heathrow as a subset of this data. Furthermore, Border Force does not currently publicly disclose information related to modern slavery instances due to sensitivity of information.

### DUE DILIGENCE

Heathrow is subject to a raft of regulatory measures that enforce audits to ensure that the Airport and our stakeholders are effectively assessing and managing operational modern slavery risks.

The UK has a mandated responsibility to follow the ICAO Convention on International Civil Aviation Annex 9, which addresses the facilitation of modern slavery and human trafficking. Adaptation of this guidance occurs through the UK Government. Audits are carried out by ICAO every five years to assess Heathrow's compliance with the ICAO Convention, with Annex 9 audits carried out periodically – most recently in 2022.

The Immigration Act 1971 Section 25 mandates the methodologies and conduct required of Border Force to detect and manage human trafficking. Associated performance is audited by the Operational Assurance Department's Independent Chief Inspector of Borders and Immigration (ICIBI) to ensure compliance with legislative requirements.

Furthermore, Heathrow has an established Whistleblowing Policy and reporting mechanism called "See It, Say It, Report It" through which colleagues can escalate suspicions of modern slavery activity through to Heathrow's security team and appropriate corporate governance.

## RISK IDENTIFICATION AND MITIGATION *cont.*

### WORKFORCE

In 2024 Heathrow directly employed 8,286 people (monthly average number), with over 80,000 people working across Team Heathrow – the wider network of external partner stakeholders that operate at the airport. We recognise the risk of exploitation and forced labour and the necessity for rigorous controls to ensure robust management of modern slavery risk.

#### RISK MANAGEMENT

Heathrow abides by UK employment law, which aims to mitigate the risk of modern slavery in the workforce. The cornerstone is the Modern Slavery Act 2015, which mandates companies, including Heathrow, to publish annual statements disclosing efforts to combat slavery and human trafficking within operations and employment arrangements.

Additionally, Heathrow abides by employment laws such as the Employment Rights Act 1996 and the Gangmasters and Labour Abuse Authority (GLAA) Licensing Standards, which play crucial roles in safeguarding workers' rights, preventing exploitation, and prosecuting offenders.

These laws and standards support authorities to investigate suspected cases of modern slavery, enforce labour standards, and provide support and protection to victims. Moreover, regulatory bodies and government agencies work collaboratively to raise awareness, monitor compliance, and ensure the effective implementation of these laws, reinforcing the UK's commitment to eradicating modern slavery from its workforce; measures that Heathrow cooperates with and engages in.

#### DUE DILIGENCE

All Heathrow colleagues have continued access to a well-publicised grievance and mediation policy and procedure, ensuring timely and equitable resolution. This approach, agreed upon with our Trade Unions and regularly reviewed for legal compliance and best practice, is overseen by the Company's Policy Governance Group, comprising Trade Union and Management representatives. Accessible via our intranet, awareness of the policy is ingrained across all levels of the organisation.

Furthermore, Heathrow is subject to routine National Minimum Wage Audits, to ensure that minimum wage payments are maintained, including consideration of elective deductions. Automated monitoring is also maintained through the Airport's online employee management system, Theo.

Regarding internal process, Heathrow has stringent recruitment procedures in place to ensure that all colleagues are hired legally and ethically. Within the onboarding process, Heathrow systematically verify the identity of candidates, carry out extensive reference checks, and conduct background checks. Right to work is also assessed, helping minimise risk of exploitation of employees. This extends to Team Heathrow colleagues working at the airport, with ongoing compliance monitored through Heathrow's identity management system.

Heathrow is also committed to mitigating elements of modern slavery risk within colleague compensation packages. In 2017, Heathrow became a Living Wage employer and zero hour contracts were abolished within the airport's direct workforce. Since then, Heathrow has worked to ensure that all direct suppliers also pay the living wage, and we continue to support other Team Heathrow partners to adopt it. Heathrow is also subject to regular Working Time Audits, to ensure that colleagues working hours remain within regulation.



## RISK IDENTIFICATION AND MITIGATION *cont.*

### SUPPLY AND VALUE CHAIN

Heathrow relies on a diverse set of material and services suppliers to maintain our operations, processes and infrastructure. Supply partners are comprised of over 1,500 suppliers ranging from strategic partnerships delivering our critical infrastructure to local small businesses providing services vital to the airport's success. Furthermore, a wide range of independent tenants operate at the airport, providing a variety of goods and services. Heathrow recognises that modern slavery risk is present within this broad supply and value chain.

### RISK MANAGEMENT

Heathrow uses a third-party provider, SEDEX (Supplier Ethical Data Exchange), as the external auditing platform to support our supply chain due diligence processes. This includes evaluation of supplier management of modern slavery risk. Each of Heathrow's Tier 1 suppliers is subject to SEDEX assessment, which is enforced within supplier contracts. Over 2023 the Airport worked on supplier assurance processes with the view to improve SEDEX uptake and compliance. The SEDEX process and assessment consists of the following elements:

- **Membership and Registration:** Heathrow, as a member of SEDEX, has access to the tools and resources provided by the platform for managing supplier data and assessments. In 2024, Heathrow identified that uptake of SEDEX had been falling behind with our intake of new suppliers. Moving forward, we aim to expand the range of accepted modern slavery assessment tools to create more scope for participation across our supply chain.
- **Supplier Engagement:** Heathrow engages with our suppliers to align with Heathrow's Responsible Business foundations which focus on the importance of ethical business practices, including those to combat modern slavery risk. This involves communicating our expectations regarding labour standards, health and safety, paying the London Living Wage, an absence of zero-hour contracts and business ethics.
- **Data Sharing:** Suppliers provide relevant data to Heathrow through the SEDEX platform. This includes information on labour conditions, environmental impact, health and safety protocols, and compliance with applicable regulations and standards.
- **Data Management:** Heathrow collects and manages supplier data within the SEDEX platform. This includes storing audit reports, performance metrics and other relevant information related to supplier compliance. Throughout 2024, Heathrow leveraged Power BI to enhance the visibility and analysis of supplier modern slavery data. This has strengthened our analytical capabilities and provided improved insights into suppliers' disclosure rates related to modern slavery.
- **Continuous Improvement:** Heathrow collaborates closely with our suppliers to address issues identified through assessments and audits. This includes implementing corrective actions, supporting data integration with SEDEX, providing resources for improvement, and monitoring progress over time. During 2024, in partnership with SEDEX, we developed a platform and methodology to assess modern slavery risk across our Tier 1 supply base.
- **Transparency and Reporting:** Heathrow promotes transparency by sharing high-level information about our supply chain practices with stakeholders, including suppliers, customers, investors, and the public. This information is included within [Heathrow's annual Sustainability Report](#).

## RISK IDENTIFICATION AND MITIGATION *cont.*

### DUE DILIGENCE

Heathrow maintains an effective, straightforward dashboard to monitor supplier compliance with modern slavery risk management. This includes maintaining a view of compliance with the Prompt Payment Code, paying the London Living Wage and no zero hour contractors (as set out in Heathrow's Sustainable Procurement Policy).

Suppliers are subject to Heathrow's Supplier Assurance Process, which sets out the steps that we follow to gather modern slavery-related information and to confirm compliance. Due diligence around supplier compliance with modern slavery standards is monitored on a frequent basis.

Heathrow's dedicated Sustainable Procurement Manager role was filled in 2024. Part of the function of this role is to work directly with suppliers to assess, support and drive progress in modern slavery risk assessment as well as encourage sustainable management across Heathrow's existing supply chain and sourcing process.

Additionally, Heathrow has developed our Balanced Scorecard to evaluate strategic Tier 1 suppliers on their performance in addressing performance against Heathrow's broad range of sustainability requirements. Tasked with assessing supplier performance against a range of sustainability standards, modern slavery risk assessment and mitigation is a key component of this evaluation.

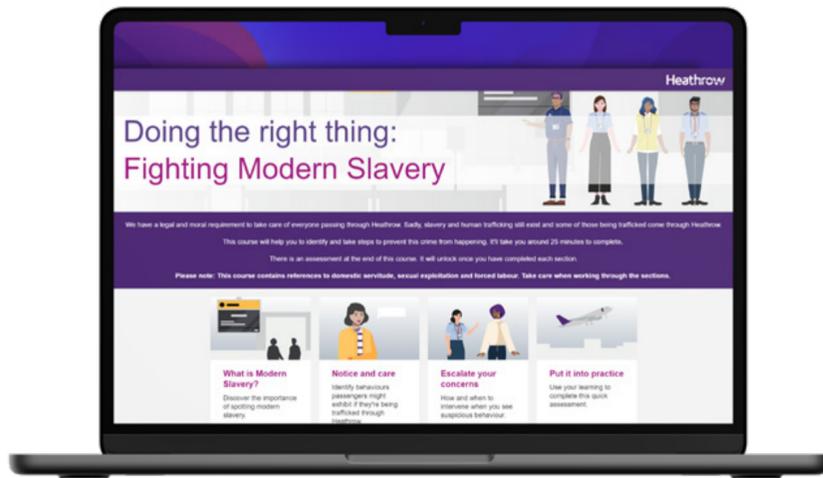
Heathrow has embedded its commitment to driving supplier performance through the Balanced Scorecard as a flagship sustainability goal, as outlined in Connecting People and Planet, our sustainability strategy.

As a part of Heathrow's strategic supplier management process, the compliance against our sustainable goals of which Modern Slavery Risk assessment and mitigation is key. Our supply chain managers and leadership will review performance at each Supplier Review Meeting and when necessary, take action to support this priority measure.



## TRAINING AND CAPACITY BUILDING

Heathrow recognises the importance of establishing targeted training programmes to increase knowledge of modern slavery identification and management practices across our stakeholder groups.



Heathrow has developed a comprehensive training program, delivered through our online knowledge hub, Theo, to ensure a consistent baseline level of modern slavery prevention knowledge among our colleagues. Training covers critical areas including:

- Providing an overview of the basic principles of modern slavery.
- Identifying appearances and behaviours of human trafficking in regular airport operations. This has been identified as a unique and critical element of modern slavery risk owing to Heathrow's position as an international hub airport.
- Providing a clear understanding of the grievance and escalation process for identifying and managing modern slavery risk and occurrence.

All colleagues are required to undertake the module upon joining Heathrow and on an annual basis. In 2024, 97.82% of non-operational and 95.29% of operational colleagues had completed the training.

Heathrow also extends the availability of our modern slavery prevention training to non-Heathrow colleagues and stakeholders at the airport. This is facilitated through Airdat, a separate Learning Management System that allows external access to Heathrow training and learning content. In 2024, a limited group of external stakeholders had access to this platform.

Furthermore, Heathrow provides frontline security officers with specialised, mandated annual training to drive knowledge around the identification of modern slavery behaviours and indicators that vulnerable populations may exhibit.

Looking ahead, to develop a strengthened approach and alignment with evolving priorities, Heathrow will be restructuring our Modern Slavery training into two distinct components.

The first component, a standalone module titled Modern Slavery in the Supply Chain, focuses exclusively on identifying and addressing modern slavery risks within Heathrow's supply chain. The initial version of this dedicated module is scheduled for release in early 2025, laying the foundation for deeper supplier engagement and risk awareness moving forward.

The second component integrates human trafficking content with Heathrow's Border Security modules. This strategic alignment is intended to reinforce our commitment to safeguarding passengers and strengthening airport security through more impactful and cohesive messaging. The updated Border Security module is scheduled for release in early 2026.



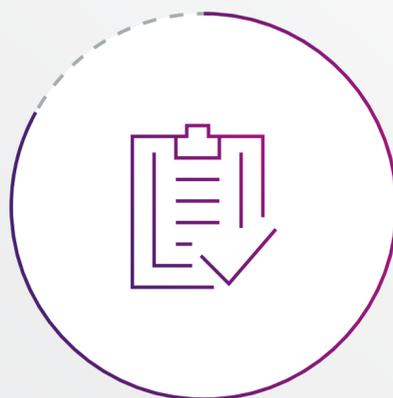
## PERFORMANCE INDICATORS

During 2024, Heathrow gathered data on several key metrics to inform our view of modern slavery risk:



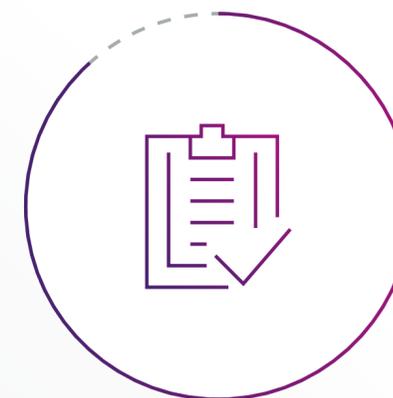
Prompt payment: The **average number of days** Heathrow takes to pay invoices in full, to ensure suppliers are paid promptly for their work:

2022	2023	2024
22.15	22.8	25.2



Percentage of **operational colleagues** that have completed Modern Slavery training:

**95.29%**



Percentage of **non-operational colleagues** that have completed Modern Slavery training:

**97.82%**

## SUMMARY REVIEW OF 2024 PRIORITIES

We recognise that we cannot combat modern slavery and human trafficking in isolation and are committed to continuously sharing insights, providing training, and working closely with key partners to continually evolve our approach. To this end, we set out a series of priorities to be addressed in 2024 to strengthen our approach to combatting modern slavery at Heathrow. Heathrow's 2024 priorities are explored alongside headline progress in the table opposite:

2024 PRIORITIES	OUTCOMES
Establishing a cross-functional working group focused on addressing modern slavery risk.	Modern Slavery Working Group established.
Expanding the availability of our modern slavery learning module to external stakeholders within the wider airport community.	Heathrow's modern slavery learning module have been made available to Team Heathrow partners through the Airdat training platform.
Improving policies relating to operational modern slavery risk response to support colleagues to understand the steps that should be taken when modern slavery risk is identified.	Heathrow's online modern slavery training was split, with development of operational and non-operational modules progressing during 2024. The non-operational supply chain modern slavery module is expected for January 2025. Meanwhile, the operational modern slavery module is expected in early 2026.
Establishing a more robust process for aligning supplier ESG information with Heathrow's expectations and build upon our capability to assist suppliers in their management of modern slavery and wider sustainability risk.	A structured process has been established to extract supplier information and assess both adherence and modelled risk, enabling a comprehensive overview of supplier-related modern slavery risk .
Developing a Qualifying Value Criteria (QVC) framework, to assess compliance with modern slavery legislation and presence of management frameworks across suppliers beyond Tier 1.	In 2024, Heathrow developed the QVC criteria to establish a mandatory requirement for all new suppliers to complete a modern slavery assessment as a prerequisite for entering our supply chain. The QVC requirements are scheduled to launch in 2025 .
Developing assessments and audits of Heathrow's Tier 1 suppliers to verify compliance with ethical and responsible business practices as part of the SEDEX process.	Tier 1 supplier modern slavery assessments are underway.

## PRIORITIES FOR 2025

Following on from progress in 2024 and to further deliver on the recommendations identified within Heathrow's 2023 modern slavery review, we are setting further priorities to address in 2025 to build upon progress to date and to ensure that effective action and governance is in place to address modern slavery risk across our supply chain, operational and workforce. These priorities include:

01

### Strengthen Governance and Stakeholder Alignment

- Evolve the Modern Slavery Working Group into a strategic forum for ongoing risk review, mitigation, and oversight.
- Deepen engagement with Team Heathrow stakeholders to enhance alignment, decision-making, and accountability.

02

### Build Organisational Capability Through Targeted Training

- Launch tailored training modules for supply chain and operational teams to improve risk awareness and response.
- Enhance modern slavery training, with potential inclusion of Modern Slavery Act compliance content, while also increasing availability of training across Team Heathrow.

03

### Enhance Risk Visibility Across the Value Chain

- Map the full Heathrow value chain to better understand exposure to modern slavery risks beyond Tier 1 suppliers.
- Introduce a structured process for auditing supplier risk assessments to improve insight and assurance.

04

### Improve Tools, Efficiency, and Supplier Support

- Increase automation and improve integration with platforms beyond SEDEX to streamline audits and risk assessments.
- Explore support mechanisms for smaller suppliers to meet compliance requirements and elevate standards across our supply chain.

**Heathrow**