



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Policy

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.

Leeds Bradford Airport (LBA) adopts a zero tolerance approach to modern slavery. We are committed to ensuring that modern slavery does not take place anywhere within our business or within the operations of any of our suppliers or business partners that work with us. We have therefore prepared this Policy in order to set out our clear commitment to upholding this stance.

Purpose & Scope

This policy is to set out our commitment to ensuring that modern slavery does not feature within our business activities, or within those of our suppliers or business partners. It sets out our corporate responsibilities and the obligations of those who work for and with us, in terms of observing and upholding our position on modern slavery.

This policy applies to all persons working for us, on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers or any other people or bodies associated with our business. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibilities

Ultimate responsibility for upholding this policy sits with the LBA Board of Directors. However, the Chief Finance & Commercial Officer has specific board level responsibility for overseeing its day-to-day implementation, including the development of adequate control systems that provide proportionate risk based oversight of our supply chain arrangements.

All Directors and Managers are delegated responsibility for ensuring that our employees, suppliers and third party business partners are made aware of and understand the requirements of this policy.

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. All persons working for LBA are required to avoid any activity that might lead to, or suggest a breach of this policy. Anyone deliberately breaching this policy will face disciplinary action, which may result in dismissal on the grounds of gross misconduct. We reserve the right to terminate contractual relationships with third parties where this policy has been breached.

Control Procedures

In order to implement this policy and uphold our position with regard to modern slavery, LBA has introduced a range of control procedures set out below. These will be kept under review and LBA reserves the right to introduce further controls if additional risks are identified:-

1. Communication of the Policy

LBA employees are required to communicate a zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of the business relationship with them and to reinforce our approach thereafter.

2. Raising Concerns (Employee)

All employees are encouraged to raise any concerns, issues or suspicions they may have relating to modern slavery, irrespective as to whether this relates directly to our business or to the operation of our supply chains or business partner activities. Such concerns should be raised at the earliest opportunity with their line manager.

3. Raising Concerns (Third Party Suppliers & Business Partners)

All third party business partners and suppliers are also encouraged to raise any concerns, issues or suspicions relating to modern slavery, irrespective as to whether this relates directly to their operation or to any other supplier or business partner. If a third party becomes aware of any matter that appears to conflict with the intentions of this policy, they are required to notify their LBA contact as soon as possible. Alternatively and where necessary, matters of concern may be raised with any Company Director or senior member of our HR or Finance teams.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of HR immediately.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Monitoring & Review

LBA recognises that eliminating modern slavery is an evolutionary process and therefore this policy will be continuously monitored and reviewed to ensure the ongoing adequacy and effectiveness of our control procedures, thereby ensuring in so far as is reasonable, the successful implementation of this policy.