

# Modern Slavery Statement

## Introduction

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as forced labour, domestic servitude, sexual exploitation, criminal exploitation, forced marriage and child labour, 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.

As a business, Liverpool Airport Ltd, comprising Liverpool John Lennon Airport (LJLA), Air Traffic Control Services Limited (ATCSL) and Liverpool Airport Services Limited (LASL) are committed to being open and transparent in all our business activities. We are therefore committed to playing our part to minimise modern slavery in all parts of our business and being alert to the potential for slavery within supplier or contractor activity. To support this, we have since 2019 had an ongoing collaboration with the Slave Free Alliance and they have helped us undertake an independent review of our policies and activities to ascertain potential areas of risk, opportunity and best practice.

This statement relates to activities taken to address modern slavery in the financial year ending 31<sup>st</sup> March 2023, which was the year that saw us return to normal business and an increase in passenger numbers. This statement is published as permitted under UK Government reporting guidelines and is approved by the Liverpool John Lennon Airport Executive Management Team (EMT).

## Structure, Business and Supply Chain

Opened in 1933, LJLA is one of the UK's longest established airports. It is comprised of three separate trading companies: Liverpool John Lennon Airport, plus two subsidiaries, Air Traffic Control Services Limited and Liverpool Airport Services Limited, referred to jointly herein as 'the Company'. Ownership is shared jointly by three separate entities: Ancala Partners (infrastructure investment manager), The Peel Group and Liverpool City Council.

Services managed directly by the airport include fire, engineering, air traffic control, airfield operations, cleaning, car parks and all other activities such as marketing and accounts, totalling approximately 230 colleagues. Additionally, there are between 2,000 and 3,000 colleagues working on site through a variety of other businesses / suppliers including:

- Baggage and passenger handling
- Security services
- Airlines
- Passenger mobility services
- Waste management
- Retail and catering concessions
- Construction
- Supply/Fuel Farm

## Governance

Sponsorship of the modern slavery programme sits with the CEO who is actively engaged with the process and reports progress to the Board of Directors. It is further devolved to the HR and Community Director to lead and coordinate with the Directors of Finance, Operations, Commercial and Aviation Services who make up the Executive Management Team (EMT). This is further

supported through a Senior Management Team (SMT) that will develop an action plan and associated KPIs to enable us to monitor progress, celebrate successes and identify areas of challenge as we continue to progress our modern slavery agenda. Our EMT engaged in a session with the Slave Free Alliance earlier this year which helped identify our potential areas of risks and one of the agreed actions was to put modern slavery on the EMT agenda to discuss on a quarterly basis. We recognise that we are currently behind in our Human Rights and Modern Slavery agenda, with external factors such as the pandemic having a considerable impact on our business. However, we are committed to enacting real change and addressing our biggest areas of risk such as the potential for modern slavery in our supply chain and service partners. This is a particular aspect that will be addressed by the SMT given that they have close working relationships with these businesses.

In addition, we have committed to making modern slavery a top priority in our ESG agenda in line with the UN Sustainable Development Goals and our ESG report which will be published later this year outlines our specific targets in this area.

## Policy

As part of our strategy to address the risk of modern slavery within the business and its supply chain, a number of supporting policies are in place including:

- Modern Slavery Policy
- People Strategy
- Grievance Policy
- Whistleblowing Policy
- Training and Development Policy
- Dignity at Work Policy
- Diversity and Inclusion Policy
- ID Centre Policy

All of the above policies were reviewed and updated earlier on this year with the help of our employment lawyers to ensure they contained robust information and relevant guidance. The ID Centre Policy background checks all airport users and is approved and audited by the CAA.

## Due Diligence

Liverpool Airport Ltd provides transportation services to our customers and many primary areas of our supply chain and hospitality provide those day-to-day operations such as security, passenger handling, customer services, retail etc. Additionally, key suppliers include areas such as construction and waste management.

We aim to provide clear guidance to our workforce and suppliers (both direct and subcontracted) in respect of our expectations and standards as well as an accessible and independent mechanism to report concerns, including modern slavery. This mechanism is a Whistleblowing Hotline operated by SafeCall which enables colleagues to confidentially and anonymously (if they wish) report concerns to an external organisation who handles cases on behalf of LJLA. We have recently updated this process, including communications on Modern Slavery and how to report a concern. We also added modern slavery to the list of disclosures in the whistleblowing policy and will continue to review and develop these measures, as appropriate, during the next 12 months.

The preference of LJLA, excluding service partners, is to employ directly recruited colleagues as this offers more control over recruitment processes. As part of this recruitment process, applicants undertake face-to-face interviews as well as ID verification, references and a criminal record check in order to obtain an airport ID. All

recruits are inducted on their first day of employment by HR and several other managers across the business, this covers Health and Safety, access to facilities, all company policies etc. The induction now includes a compulsory e-learning module helping colleagues to spot, prevent and report modern slavery which is undertaken by all new starters and will also be rolled out this autumn to all existing direct colleagues. We are aiming for a 100% completion rate for this module.

### **Areas of risk in the business and supply chain**

We understand that any areas where there is a high degree of subcontracting (such as on construction sites) or where we have less visibility of our supply chain, may harbour modern slavery risk. It is our aim to develop a progressive programme to further map such supply chains and evaluate that risk through both EMT and SMT, where members all have close relationships with these businesses.

The Company does not have visibility of the contractual arrangements or recruitment processes used by all parties present at the airport. However, we are currently in the process of reviewing our tender process to include a more detailed review of how our potential suppliers are engaged with modern slavery.

We are also very alert to the fact that airports can provide gateways for the trafficking of people and of the need to promote awareness and reporting options for passengers. Collaboration with partners such as the airport police, security and border force are valuable to share intelligence and good practice for the identification and safeguarding of potential victims. We hold quarterly Risk Register Meetings (RAG) with these groups, including the airlines, to assess and mitigate against the trafficking of people.

We are also aware of people's increased vulnerability when it comes to the cost of living, the energy crisis, ongoing conflicts and recent changes in legislation, i.e., Brexit. This increases the number of people in vulnerable situations which can lead to them being placed in potentially exploitative situations. At the beginning of the financial year we collaborated with National (DLUHC) and local (LCC) government with the provision of a safe gateway for Ukrainian nationals during the initial phases of conflict with the coordination of a welcome desk located in the terminal. Financial pressures can also limit options for already vulnerable individuals, and it is our intent to endeavour to make our colleagues and service partners aware of this risk by providing modern slavery awareness training.

### **Actions to reduce modern slavery**

Whilst benefitting from the necessary regulatory and security environment in which the airline sector operates, which may potentially deter those seeking to exploit workers, LJLA is not complacent to modern slavery risk.

We will continue to develop our capacity to;

- Evaluate risk through mapping our supply chain
- Include commitments to reduce modern slavery as part of our ESG agenda in line with the UN Sustainable Development Goals
- Implement an improved tender process for suppliers to include modern slavery and board approval
- Effectively respond to any incidents and develop an escalation policy for reported incidents
- Drive continuous improvement via SMT who will undertake awareness training by the Slave Free Alliance
- Launch a Modern Slavery Action plan which we be implemented over the next 3 years
- Review our Modern Slavery Policy annually
- Robustly check and improve our recruitment process
- Push awareness and educate 100% of our colleagues on Modern Slavery



- Include questions about whistleblowing in our Employee Engagement Survey
- Develop supplier code of conduct and hotline
- Promote new Safecall whistleblowing poster to everyone at the Airport
- Include Modern Slavery on the Executive Management Team's meeting agenda
- Identify potential victims of trafficking
- Continue collaboration with the Anti-Slave Free Alliance to ensure best practice

## Training

We continue to review our training in respect of modern slavery as appropriate for roles at all levels of the organisation and the following training has taken place/will take place this year:

- EMT undertook awareness training by the Slave Free Alliance in February 2023
- SMT will participate in awareness training by the Slave Free Alliance before the end of the calendar year
- All new starters and existing colleagues will be assigned an e-learning module on how to spot, prevent and report modern slavery with the goal of a 100% completion rate by the end of the calendar year

We are aware that we have a long way to go until we feel confident that there is no modern slavery associated with our business, and we are committed to doing everything in our power to reduce the risks by being open and transparent about all business activities. We hope this goes somewhere to minimise modern slavery activities and will continue to constantly review and update our procedures.

John Irving  
CEO