

MODERN SLAVERY ACT STATEMENT FOR 2022

This Modern Slavery Act Statement (the “Statement”) is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2022, and has been approved by the Board of Directors of Heathrow Airport Holdings Limited (“Heathrow”) on [25 May 2023] 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 25 May 2023.

Introduction by John Holland-Kaye the Chief Executive Officer of Heathrow Airport Holdings Limited:

As a “Responsible Gateway”, Heathrow must take the best possible care of everyone who passes through the airport. Keeping everyone safe, treating everyone with respect and doing the right thing are three of the values which underpin everything we do. Unfortunately, we live in a world in which slavery and human trafficking still takes place, and some of those being trafficked come through Heathrow.

2022 has been a year of significant recovery at Heathrow. We welcomed 61.6 million passengers, an increase of 42.2 million versus 2021, which represented the highest passenger increase of any airport globally. We continued to progress all four of our strategic priorities - mojo, transforming customer service, beating the plan and sustainable growth, which underpin our vision to give our passengers the best airport service in the world.

As Heathrow continued to build back capacity throughout 2022, we rolled out our updated Modern Slavery Prevention training course, which was mandatory for all colleagues. We endeavour to ensure that slavery and human trafficking continue to be tackled throughout our business and supply chain.

Throughout 2022, we remained committed to tackling slavery and human trafficking, and our Modern Slavery Act Statement for 2022 gives an overview of the ways in which we have been working to do so.

John Holland-Kaye,

Chief Executive Officer

Heathrow’s Structure

Heathrow Airport Holdings Limited (“Heathrow”) indirectly owns (i) Heathrow Airport Limited, which owns and operates Heathrow Airport, the largest airport in the UK; and (ii) Heathrow Express Operating Company Limited, which owns the Heathrow Express rail service.

The ultimate parent company of Heathrow is FGP Topco Limited (together with its subsidiaries from time to time being the “Heathrow Group”). Heathrow is the intermediate parent company of the Heathrow Group. The Heathrow Group is indirectly owned by investment vehicles controlled or managed by Ferrovial S.A. (25.00 per cent.), Qatar Holding LLC (20.00 per cent.), Caisse de dépôt et placement du Québec (12.62 per cent.), the Government of Singapore Investment Corporation (11.20 per cent.), Alinda Capital Partners (11.18 per cent.), China Investment Corporation (10.00 per cent.),

cent.) and Universities Superannuation Scheme (10.00 per cent.). Heathrow Group operates in the United Kingdom.

As of 31 December 2022, the Heathrow Group has a monthly average of 6,316 colleagues. For a more detailed description of our business, including profit and loss, and balance sheet, please refer to the latest annual reports and financial statements of the Heathrow Group entities.

Heathrow's Business

In 2022, passenger traffic increased to 61.6 million, a threefold increase on the previous year. This marked Heathrow as the fastest growing airport in the world and we climbed to eighth largest globally. Operationally, we continue to build back our airport capacity in full across Team Heathrow.

In 2022, we established a 'Build Back Capacity' programme covering all aspects of the airport ecosystem to progressively increase capacity resilience and service levels following the pandemic.

Heathrow Airport remains 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 overseas markets, Heathrow Airport enables businesses to reach markets around the world. The airport supports trade, attracts foreign investment into the UK and we bring overseas visitors to the UK's shores. As one of the world's leading international hub airports, Heathrow Airport provides the UK with global connectivity.

Our Supply Chain

As the UK's only hub airport, Heathrow Airport has a critical role to play in the national economy – both today and in the future. We aim to operate Heathrow Airport as a place that drives change throughout our supply chain, delivering ethical, sustainable, and low-carbon procurement and sourcing as far as possible.

Heathrow's supply chain is both extensive and global, and incorporates a wide range of products and services spanning a variety of industry sectors, broadly grouped as follows:

- Capital Construction and Property;
- Engineering, Maintenance & Facilities Management;
- Professional Services;
- Passenger Experience;
- IT Services and Telecoms;
- Office Services, Supplies, Uniforms & Travel; and
- Group Service Contracts (including statutory services, rent, rates, utilities, policing etc.).

Heathrow is committed to complying with all applicable laws and regulations as well as to conducting its supply chain activities in a fair, transparent and professional manner at all times.

Supply Chain Risk Assessment and Due Diligence

Heathrow has due diligence processes which focus on: (i) identifying the parts of our supply chain that present the greatest risk; and (ii) tackling slavery and trafficking risk in the supply chain.

Heathrow uses a third-party provider, SEDEX (Supplier Ethical Data Exchange), as the external auditing platform to support our supply chain due diligence processes.

We previously set out clear objectives to tackle slavery and human trafficking risk in our supply chain, through conducting a thorough risk assessment, and by targeting all medium and high-risk strategic suppliers (as determined in accordance with the process described below) to register on SEDEX and this work continues.

In targeting these suppliers, we utilise the SEDEX risk methodology to identify Heathrow product categories which have a medium and high inherent risk of modern slavery.

Our supplier selection process for new suppliers includes a requirement for suppliers in medium and high labour risk categories to make a commitment to registering with SEDEX. This is an integral part of the internal approval process.

Heathrow is a partner of the Supply Chain Sustainability School (the “School”), which provides practical support to suppliers in the form of e-learning modules, tailored self-assessments, action plans and sustainability training which includes ethical business practices, modern slavery and human trafficking.

We are continuing to develop our supplier assurance process by automation, through our Enterprise Resource Planning system.

Our Policies & Contractual Controls

Heathrow will not tolerate slavery or human trafficking in its business or supply chain. We embed and maintain effective systems, controls and internal policies to prevent slavery and human trafficking and take all allegations of slavery and human trafficking very seriously.

Our Modern Slavery Policy (the “Policy”):

- makes it clear that Heathrow’s approach is not to tolerate modern slavery or human trafficking;
- sets out Heathrow’s approach to maintaining and enforcing effective systems and controls to prevent modern slavery or human trafficking within our business and supply chain;
- clarifies each individual’s role in complying with applicable laws and safeguarding vulnerable persons against modern slavery or human trafficking;
- provides clear guidance explaining the concepts of modern slavery and human trafficking, and what needs to be done where an individual suspects modern slavery or human trafficking is taking place at Heathrow Airport or in our supply chain;
- makes it clear that Heathrow expects its supply chain to comply with the requirements of the Policy, including that all third parties associated with Heathrow, including agents, volunteers,

consultants, contractors and their employees (“Heathrow Business Partners”) are expected to conduct themselves in accordance with the standards set out in the Policy;

- includes a statement confirming that Heathrow will not tolerate modern slavery or human trafficking at any tier in our supply chain; and
- 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.

Our Sustainable Procurement Policy governs the products and services we buy, the organisations we do business with, and the contracts that we manage across all aspects of our plan for sustainable growth. ‘*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.

Our Whistleblowing Policy is aimed largely at our colleagues (permanent or temporary), but also applies to all Heathrow Business Partners working at Heathrow Airport. This policy encourages individuals to report any wrongdoing which extends to slavery or human trafficking. 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.

Additionally, we have included robust provisions in our standard procurement and retail concession agreements to require our suppliers and concessionaires to comply with applicable anti-slavery legal obligations and Heathrow’s own high standards, to provide relevant training to their personnel and to be transparent with their actions in this regard to enable us to monitor performance.

Training Colleagues

To further ensure an understanding of the risks of modern slavery and human trafficking across our business, we have committed to raising awareness and understanding among our colleagues on the importance of preventing any form of modern slavery and human trafficking.

Our Modern Slavery Prevention Training was updated in 2022. The immersive e-learning module is available to all colleagues via our online learning and development platform and completion is mandatory. The training engages Heathrow colleagues on what modern slavery is, explains why it is important in the context of Heathrow, advises on signs to look out for and how to escalate concerns.

Additional to the Modern Slavery Prevention Training e-learning module, Heathrow Security colleagues complete mandatory Modern Slavery training during induction, which is refreshed annually. The training provides practical guidance on spotting the signs, reporting, and safeguarding of passengers against modern slavery and human trafficking. With the focus on building back capacity throughout 2022, training for security colleagues on preventing Modern Slavery remained a top priority.

Wider Heathrow community

Heathrow works collaboratively with UK Border Force, the Met Police and other agencies operating at Heathrow Airport to assist them in detecting and disrupting potential occurrences of human trafficking.

To support making Heathrow a responsible gateway to the UK (a place that strives to end trafficking of people and wildlife), Heathrow works closely with Heathrow Travel Care, the independent airport crisis social work team. As a registered charity, its purpose is to assess, advise and assist anyone in, or potentially in, difficulty at Heathrow Airport, including passengers, colleagues and those who are at the airport for other reasons. This includes supporting colleagues and passengers with concerns relating to modern slavery and human trafficking.

Heathrow Travel Care attend the Joint Strategic Safeguarding & Trafficking Group (JSSAT). Heathrow Travel Care are involved in Operation Limelight – the Police-led operation focusing on certain flights to raise awareness of female genital mutilation (FGM).

Raising awareness of Modern Slavery and Human Trafficking

During 2022, Heathrow continued to support the A21 Can You See Me campaign, focusing on equipping the public to recognise indicators of human trafficking, and report suspected scenarios. Campaign materials remained on trolleys as well as the arrivals washroom doors.

Heathrow raises awareness of modern slavery and human trafficking to all colleagues through our mandatory Modern Slavery Prevention Training.

Our Responsible Business foundations detailed in *Heathrow 2.0*, our sustainability plan, outline the steps taken by Heathrow in 2022 towards preventing modern slavery and human trafficking. These foundations include:

- Modern slavery and human trafficking - Heathrow will not tolerate slavery or human trafficking in its business or supply chain. We embed and maintain effective systems, controls, and internal policies to prevent slavery and human trafficking and take all allegations of slavery or human trafficking very seriously
- Paying the living wage – Heathrow became a Living Wage employer in 2017 and published our London Living Wage roadmap. Since then, we have been working to ensure that all our direct suppliers also pay the living wage, and we will continue to support other Team Heathrow partners to transition
- Responsible procurement – sustainability is built in at all stages of the procurement process so we can ensure that our partners share our values and understand our sustainability ambitions.

Health and safety of workers

Heathrow values the health and safety of colleagues, passengers, and anyone else affected by the airport's activities. Keeping people safe is the starting point for how we operate. We have a legal and moral responsibility to ensure that we safeguard the wellbeing of our people, and also of our business partners and the public who may be affected by our activities. Our focus on health and safety is not just the right thing to do, it is the foundation of an efficient operation, a secure airport and a sustainable business.

Supporting suppliers

Heathrow has remained committed to supporting our suppliers by remaining a firm sponsor of the Prompt Payment Code and we encourage our supply chain to adopt Prompt Payment Code practices. Our Average payment term in 2022 was 22.2 days which is an improvement on 2021 payment average (31.2 days).

We are also now further developing our supplier assurance process by automating this through our Enterprise Resource Planning system to ensure our 1st tier suppliers are also paying our supply chain fairly.

Grievance procedures

All colleagues have continued to have access to a long-established and well-publicised policy, which also contains the associated procedure, in consideration of grievance handling. This approach provides a means of resolving grievances in a timely, fair and equitable manner, is agreed with our Trade Unions and is reviewed on a regular basis for both legal compliance and best practice.

The application of grievance policy and procedure are overseen by the Company's Policy Governance Group, this group consists of both Trade Union and Management representatives.

The grievance policy and procedure are accessible to all colleagues via our HUB+ intranet; awareness of the policy is embedded at all layers of our business.

Our future commitments to combatting Modern Slavery and Human Trafficking

Modern Slavery is a severe breach of human rights, and as a business that prides itself on keeping everyone safe, treating everyone with respect and doing the right thing as three of our core values, we are determined to make a difference in preventing human exploitation throughout our operations and supply chains.

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 stakeholders to tackle modern slavery and human trafficking together.

Heathrow is committed to tackling modern slavery and human trafficking and we recognise our leadership role in working with Heathrow's Business Partners and Team Heathrow to do so. We will keep our focus on the continuous improvement and delivery of effective strategies to meet this important commitment. In early 2022, we published an update to our Heathrow 2.0 sustainability strategy which includes an ongoing focus on tackling modern slavery and human trafficking as one of the foundations which ensure that Heathrow is a responsible business.

For further detail please refer to page 43 of our Heathrow 2.0 Sustainability Strategy:
<https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/further-reading/Heathrow%202.0%20Connecting%20People%20and%20Planet%20FINAL.pdf>

Annex 1: Relevant Heathrow Group companies

The following Heathrow Group companies have total turnover in excess of £36 million as of 31 December 2022 and are otherwise in scope of the Modern Slavery Act 2015:

ADI Finance 1 Limited

ADI Finance 2 Limited

FGP Topco Limited

Heathrow (AH) Limited

Heathrow (DSH) Limited

Heathrow (SP) Limited

Heathrow Airport Holdings Limited

Heathrow Airport Limited

Heathrow Express Operating Company Limited

Heathrow Finance plc

Heathrow Holdco Limited

LHR Airports Limited