



BELFAST INTERNATIONAL AIRPORT

Modern Slavery and Human Trafficking Statement 2023

1.0 Introduction

Belfast International Airport Ltd (BIAL) adopts a zero-tolerance policy towards modern slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any other parts of our business and prevent the airport being used by human traffickers.

The Modern Slavery and Human Trafficking Policy sets out our corporate aims, responsibilities and compliance and as part of our obligation towards the elimination of modern slavery. The policy is communicated to suppliers and business partners as part of our engagement process and to employees who are encouraged to report any areas of concern they may have regarding modern slavery or unethical practices.

Additionally, there is a commitment to keep the policy and arrangements under regular review to ensure they remain effective and to reflect changes in relevant legislation

During 2023 significant capital investment increased with the terminal extension project and next generation security equipment. Our projects and procurement teams conducted due diligence checks on the supply chain to ensure modern slavery compliance.

Prior to a tender process, all new suppliers are sent a Pre-Qualification Questionnaire which includes a section on modern slavery and when engaging with a new supplier they are invited to complete on onboarding process which includes confirmation that they are compliant with all applicable laws, regulations and guidance relating to slavery and human trafficking (including the Act and Belfast International Airports Anti-Slavery and Human Trafficking policy). This also includes ensuring that any contracts with their subcontractors have similar obligations.

2.0 Our Business

BIAL is a subsidiary of VINCI Airports, a global player in the airport industry. It is Northern Ireland's principal airport and the second largest gateway on the Island of Ireland, providing Northern Ireland with 24-hour access, all year round.

All companies within the VINCI Group respects the United Nations Global Compact and adhere to the ten principles covering human rights, employment regulations and anti-corruption. They share a mutual code of ethics and conduct which is governed by the Board of Directors, who shall supply leadership from the top down and lead by example. Our



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modern slavery policy is communicated to our supply chain and incorporated into our procurement procedures.

BIAL is committed to complying with all legal and ethical obligations and to act with integrity and transparency in all business dealings. We will develop effective controls to ensure we take appropriate action whenever any concerns are raised from either within or outside the business.

This statement relates to activities taken to address modern slavery in the financial year ending 31st December 2023.

3.0 Our People

BIAL has in place a number of key policies which state how we operate as a business and the steps taken to ensure that we are transparent and inclusive. These are reviewed and updated regularly and include:

- Modern Slavery and Human Trafficking Policy and Statement
- Code of Ethics and Conduct
- Anti-Bribery
- Procurement policy
- Recruitment and Selection
- Dignity at Work
- Whistleblowing (local and corporate)
- Responsible Business
- VINCI Manifesto

The following controls act as a robust and effective mitigation against the risk of modern slavery and human trafficking amongst our own employees, and those within the Airport site who require an airport ID pass:

- Directly employed staff undergo a stringent selection process and are background checked in line with aviation security regulation including appropriate security checks and reference procedures.
- Pre-employment checks on all employees who join the company to confirm their identity.
- Check bank account details to ensure they are accurate and belong to the employee.
- Full, written contracts of employment that are compliant with The Modern Slavery Act 2015 (the Act).
- Pay and conditions of our direct employees are of a high standard and above legislative requirements.



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- Unpaid work experience or internships are closely controlled in liaison with the appropriate third party.
- Employees are encouraged to report any areas of concern they may have. All reports received shall be treated seriously and in confidence where appropriate.
- Provide training to relevant employees on our key policies to ensure a high level of understanding of the risks associated with modern slavery and human trafficking.
- All managers are responsible for ensuring compliance of the Act in the day-to-day performance of their roles.

Any potential contravention will be dealt with seriously and investigated appropriately under company policy.

4.0 Our Supply Chain

BIAL operates exclusively in the highly regulated UK airport sector and understands that it is critical to the success of our modern slavery policy and practice to engage with our supply chain. We expect the same high standards from all our contractors, suppliers and other business partners, as part of our procurement processes.

We are committed to complying with all applicable laws and regulations as well as conducting our interaction with our supply chain in a fair, transparent and professional manner.

We communicate our policy and statement as part of the supplier engagement process and all suppliers are asked to provide the following legally binding obligations, as and when contracts are entered into or renewed to:

- Comply with all applicable laws, regulations and guidance relating to slavery and human trafficking (including the Act and Belfast International Airports Anti-Slavery and Human Trafficking policy).
- Seek to ensure that any contracts with their subcontractors have similar obligations.

We ensure that our standard purchase order terms and conditions (issued to all suppliers prior to working at the airport) include compliance with modern slavery and human trafficking regulations as a key requirement and prerequisite to them working on site. All tender processes undertaken will clearly state compliance with these regulations as a condition/requirement.

We review and ensure that all suppliers acknowledge and warrants that it conducts its business in a manner that is consistent with group policies including the VINCI group Human rights' guide.



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Several of our business partners will be required to comply with the Act due to their level of turnover. The implementation of the above obligations will take place when contracts are entered into or renewed.

BIAL will undertake the following activities in the current financial year:

- Continuation of a rolling review and amendment of standard terms of contract to incorporate the requirements of the Act as contracts are placed or renewed.
- Procurement exercises that are undertaken will contain specific references to the Act.
- Large companies employed by the airport and above the threshold at which they should be producing their own statement will be expected to supply their statements to the airport on request.
- Review training in respect of modern slavery and launch the Modern Slavery e-learning module on VINCI's learning management system.
- Review policies and procedures to ensure employees understand and are able to raise any concerns or suspicions they may have in relation to modern slavery and unethical practices.
- Continuation to embed appropriate measures into our processes to combat Modern Slavery and Human Trafficking.
- Work towards Airport Carbon Accreditation to Level 3 (Optimisation); Gold Level in the Northern Ireland Environmental Benchmarking Survey; and maintaining our ISO 14001 Certification.
- Participate in VINCI's VICTOR campaign on corporate governance to agree key processes and action plans.

5.0 Review and Approval

This statement shall be reviewed on an annual basis and as and when necessary to reflect changes in relevant legislation

This statement is made pursuant to Section 54 (1) of the UK Modern Slavery Act 2015 and constitutes the Slavery and Human Trafficking Statement for the financial year ending 31st December 2023. It has been approved by the Board of Directors.

For and on behalf of Belfast International Airport Ltd

28th June 2024