



# BELFAST INTERNATIONAL AIRPORT

## Modern Slavery and Human Trafficking Statement 2020

### 1.0 Company Approach

Belfast International Airport Ltd (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. In 2019 we carried over 6million passengers, however, the travel restrictions relating to COVID-19 has severely impacted our level of business within the last year, and we remain committed to monitoring and tackling modern slavery & human trafficking.

Modern slavery can take many forms. The Modern Slavery Act covers four key criminal activities: slavery, servitude, forced and compulsory labour and human trafficking. They have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

We adopt 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.

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 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. There can be no denying that COVID-19 is the biggest threat to the aviation industry that we have seen in recent times. The impact on airlines, airports and the wider tourism and transportation sector, as well as the wider economy has been dramatic and unprecedented. Whilst travel restrictions may have served to reduce the likelihood of cross border human trafficking, precariousness due to the crisis may have increased and placed people more at risk ; we need therefore to be aware of a potential increase and to partner with airport police and border force to share intelligence and good practice to safeguard potential victims.



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This statement relates to activities taken to address modern slavery in the financial year ending 31 December 2020.

## 2.0 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
- Code of Ethics and Conduct
- Anti-Bribery
- Recruitment and Selection
- Equal Opportunities
- Whistleblowing
- Corporate Responsibility
- VINCI Manifesto

The controls in place to reduce the risk of modern slavery and human trafficking in BIAL are as follows:

- Directly employed staff who undergo a stringent selection process and 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 Act;
- Pay and conditions of our direct employees are of a high standard and above legislative requirements;
- 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 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.



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## 3.0 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.

In relation to our supply chains, we undertook the following actions:

- Ensured that as part of the supplier engagement process, all suppliers (whether or not they are independently required to comply with the Act) were asked to provide the following legally binding obligations, as and when material 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);
  - To seek to ensure that any contracts with their subcontractors have similar obligations.
- Ensured that our standard purchase order terms and conditions (issued to all suppliers prior to working at the airport) include compliance with the Act as a key requirement and prerequisite to them working on site.
- Reviewed and ensured that all suppliers acknowledge and warrants that warrants that it conducts its business in a manner that is consistent with group policies including the VINCI group Human rights' guide.

A number of our business partners will be required to comply with the Act due to their level of turnover. We will be seeking to introduce obligations in their contracts similar to those we have asked our suppliers to comply with. The implementation of those obligations will, as with suppliers, 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
- Continue employee training on the requirements and ethos of the Act



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- 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
- Continue to adhere to COVID-19 Government guidelines and policies

## 4.0 Review

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

## 5.0 Approval

This statement is made pursuant to Section 54 (1) of the Act and constitutes the Slavery and Human Trafficking Statement for the financial year ending 31 December 2020. It has been approved by the Board of Directors.

Managing Director  
For and on behalf of Belfast International Airport Ltd

Date 5<sup>th</sup> July 2021