

MODERN SLAVERY ACT 2015

TRANSPARENCY STATEMENT 31ST MARCH 2016

INTRODUCTION FROM THE CHIEF EXECUTIVE OF M.A.G

We are committed to maintaining and continuously improving our practices to combat slavery and human trafficking. We are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole. We all have a responsibility to be alert to the risk of this in our business. Staff are expected to report concerns and management are expected to act upon them.

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015. We recognise that slavery and human trafficking can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. We are also aware that forced labour as a form of slavery includes debt bondage and the restriction of a person's freedom of movement whether that be physical or non-physical, for example, by the withholding of a workers identity papers. Throughout this statement we use the terms slavery and human trafficking to encompass all of these various forms of coerced labour.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes M.A.G's slavery and human trafficking statement for the financial year ending 31 March 2016.



Charlie Cornish
Chief Executive, M.A.G

Our Business

M.A.G is the UK's leading airport group and owns and operates Manchester, London Stansted, East Midlands and Bournemouth Airports, together with a significant property business. In 2015 we established a subsidiary in the United States, M.A.G USA, an airport development, management and services company.

M.A.G has over 4,500 direct employees.

M.A.G is a private company with shareholdings held by the Council of the City of Manchester (35.5%), IFM Investors (35.5%) and the nine remaining Greater Manchester local authorities (29%).

Our Supply Chain

Our supply chain encompasses a diverse range of goods, works and services and spans many industry sectors. It is broadly grouped into the following categories:

- Capital Construction and Property,
- Professional and Outsourced Services (which includes our recruitment supply chain),
- IT Services,
- Facilities Management, Engineering and Maintenance, and
- Group Service Contracts (rent / rates / utilities / policing etc.).

In 2015, 97.67% (1,256 No.) of our first tier suppliers were UK based. 1.48% were based in the EU (excluding the UK) and the remaining 0.85% were from the US (8No.), Canada (1No.), Norway (1No.) and South Africa (1No.).

For the purposes of this statement we report on steps taken within our supply chain, by which we mean those suppliers to the group with whom our organisation deals directly.

Relevant Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to endeavor to ensure that slavery and human trafficking is not taking place anywhere in our supply chains.

In keeping with our commitment to act with integrity in all our business dealings, many of our policies are relevant to ensuring that there is no slavery or human trafficking in any part of our business or our supply chains. Our relevant policies include:

- Anti-Slavery and Human Trafficking Policy
- Procurement & Contracts Policy
- Sustainable Supply Chain Policy
- Whistleblowing Policy
- Anti Bribery and Corruption Policy
- Code of Professional Conduct
- Disciplinary Policy
- Diversity Policy
- Grievance Policy
- Recruitment and Selection Policy
- Temporary Workers Policy

Due Diligence And Risk Mitigation Processes

As part of our initiative to identify and mitigate risk we have in place the systems to:

- Identify and assess potential risk areas in our operations and in our supply chain
- Mitigate the risk occurring in our operations and supply chain
- Monitor potential risk areas
- Protect whistle blowers

Supplier Adherence To Our Values

We have zero tolerance to slavery and human trafficking. To ensure that all of those in our supply chain comply with our values we have in place a supply chain compliance programme.

This consists of:

- Modern Slavery Act compliance is set as a condition of participation in our tender processes
- Our procurement documentation and our contract terms and conditions require adherence with the Modern Slavery Act and we have robust audit rights
- Any convictions under the Modern Slavery Act will result in termination of contract
- Maintaining an approved supplier list for recruitment an on-site single provider of contractor / temporary staff. All of whom comply with M.A.G's recruitment policies and practices via signed agreements

Training And Communications

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we will provide training to our staff. We will also require our business partners and supplier to provide training to their staff.

Our Effectiveness In Combating Slavery And Human Trafficking

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be expected to be a non-compliance and be in breach of employment laws, our direct employment practices, our Code of Professional Conduct and / or our wider policies.

However, the business practices that relate to the mitigation of slavery or human trafficking risk do have internal performance measures.

In relation to our own employment practices, we monitor and review:

- Employee engagement scores
- Grievances
- Issues raised through Public Interest Disclosure
- Eligibility to Work procedures
- Vetting and Security guidance

In relation to our suppliers we use third party suppliers to assess and monitor risk both before contracting with suppliers and during the course of the contract.