

Manchester Airports Group

# Modern Slavery Statement

For the year ended 31 March 2023



# Introduction

At MAG, we remain committed to doing all we can to prevent and eliminate modern slavery.

We understand the critical and unique role that MAG plays as an international airport group and the influence that brings across our supply chain. We continue to work with our partners at each airport to improve our practices and to lead the way in identifying risks and speaking out when instances of modern slavery are found.

MAG is a member of Slave-Free Alliance, a leading non-profit organisation dedicated to addressing modern slavery in organisations and supply chains globally. Our partnership forms an important and central foundation to assist us in training our colleagues and improving how we tackle modern slavery across our business.

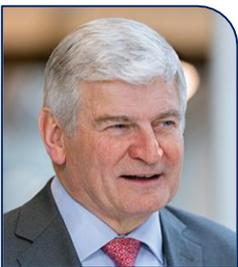
This year's statement sets out the steps we have taken to prevent slavery and human trafficking from taking place in any part of our business including our supply chain.

A particular focus this year has been to continue to improve our approach to mitigating risks in our supply chain and has included the development of a Procurement Modern Slavery Risk Management Framework. In addition, we have undertaken a full review of our supply chain and undertaken site visits to higher risk suppliers. The site visits concluded that there was no evidence of modern slavery.

We have continued to work with Slave-Free Alliance to evaluate the risks specific to the MAG supply chain and actively engaged with suppliers to understand as much as possible about our sub-tiers.

Our objective is to work collaboratively with our preferred suppliers to deliver ethical, sustainable procurement and achieve our wider Corporate Social Responsibility (CSR) goals.

We are fully committed to maintaining our zero tolerance of modern slavery and working to ensure it can never gain a foothold. Our Board, and everyone at MAG, is fully committed to delivering this essential objective.



Sir Adrian Montague OBE  
Chair



Vanda Murray OBE  
CSR Committee Chair



Charlie Cornish  
Group Chief Executive

Publication of this statement has been developed in accordance with Section 54 of the Modern Slavery Act 2015 and covers the financial year ending 31 March 2023.

This statement is made and issued on behalf of the Manchester Airports Holdings Ltd, the parent company of Manchester Airports Group and is fully supported by MAG's Board of Directors. It was approved by the Board on 20 September 2023.

# Our progress this year

Some of our key achievements in the area of modern slavery this year include:



## Refreshing our vision and strategy

We held a workshop with members of the Modern Slavery Working Group, and Slave Free Alliance to update our vision, strategy and priorities. We have used this refreshed position to develop a three-year roadmap for our work to combat modern slavery.



## Enhancing our training and education

In partnership with Slave Free Alliance, we have updated and modernised our mandatory, annual on-line training materials, raising awareness and increasing capability to identify slavery and human trafficking risks. In addition, our colleagues in any customer-facing operational roles (including our security function) receive in-person training as part of their induction and annual training.

Our Modern Slavery Working Group, which includes UK Border Force, local police, the chaplaincy, and our partners, worked together to recognise Anti-Slavery Day in October 2022 via a communication and awareness campaign, just one of the activities in our annual communication and engagement plan.

We have also launched our new Modern Slavery communication branding, which includes the 'blue heart' logo, an internationally recognised symbol against human trafficking. Every airport passholder is given a leaflet about modern slavery, which explains how to spot it and what to do, so that people who work in our business are empowered to take appropriate action if necessary.



## Improving how we manage risk in our supply chain

In the last financial year, we have worked with Slave Free Alliance to improve our supply chain risk management framework. We developed and rolled out an extensive modern slavery e-assessment tool across our construction, uniform, services, agency labour and renewables spend categories. Developed in conjunction with Slave Free Alliance, the assessment maps supplier responses to questions across modern slavery awareness, training, sub-tier management and audits, policies, and the treatment of employees.

In addition to our robust procurement sourcing process, we have extended our post contract due diligence to include site visits. No evidence of modern slavery was found during any site visit, and improvement plans were agreed for risk mitigation based on awareness, training, and policy development within these organisations. If evidence of modern slavery was to have been found or reported, MAG has a number of contractual remedies to support the appropriate management, ranging from corrective action plans to contract termination for breach of the Modern Slavery Act 2015.

For any high risk or complex procurements, such as our photovoltaic framework, MAG have continued to partner with Slave Free Alliance for support and have included a 10% evaluation weighting to our framework to assess how our providers manage the modern slavery risk within their own supply chains. Slave Free Alliance have also supported with

our assurance framework for our partners at the airports, and our onsite construction projects.

Our Procurement and Contracts team have commenced a business Transformation project, focused on driving the optimisation of our supply base via a category management approach and transforming MAG systems and processes to leverage technological advances. Improving how we manage overall risk in our supply chain is a key deliverable, as is the requirement to build a sustainable, data driven supply chain baseline.

In March 2023, we partnered with EcoVadis, to support the delivery of our objectives. EcoVadis provides a holistic sustainability rating service, delivered via a global cloud-based platform. This partnership will drive the scaling of our approach as well as enabling us to proactively monitor and digitally assess the sustainability performance of our current and prospective suppliers across Labour & Human Rights, Ethics, Sustainable Procurement, and the Environment.



### Improving our policies and processes

We have updated the MAG Modern Slavery Policy and ensured that all colleagues are aware of the policy. We have strengthened our debt bondage review controls for our colleagues and developed an internal escalation process, including guidance to ensure we provide the right level of support should one of our colleagues be identified as a potential victim of modern slavery.



### Tightening our auditing and reporting

We have developed a modern slavery governance and assurance framework process which summarises the management of our risks. This will be reviewed annually by the Modern Slavery Working Group. The terms of reference for this group have also been updated.

# About our business

## Our business

MAG owns and operates three UK airports – Manchester, London Stansted and East Midlands – making it the largest airports group in the UK.

Our airports have recovered strongly since the pandemic, and across our Group we served 54 million passengers in the 12 months to March 2023 which represented 86% of our pre-pandemic passenger numbers. Approximately 40,000 people are employed on site at our airports, either by MAG directly or by our airlines, ground handlers, retailers and other partners.

Last year we also launched CAVU, a global distribution business for a wide range of travel products including parking, hotels, transfers, and lounges across EMEA and the Americas.

MAG's ownership structure comprises a blend of public and private shareholders, including Manchester City Council (35.5%), IFM Investors (35.5%) and the nine other Greater Manchester local authorities (29%).

## Working together for a brighter future

We have a duty to minimise our impact on our environment and maximise the support and benefit we offer to the areas we serve.

Our CSR strategy is an important and integral part of our business strategy and is designed to enable us to deliver growth in a way that benefits local and regional communities and minimises the impacts associated with our operations.

Details of our CSR strategy, which includes our commitments relating to modern slavery, can be found [here](#).

## Our values and vision

During the course of this year we have rolled out new values and strategic priorities across MAG.

Our values are the guiding principles for our business and our people. They are a reflection of who we are, and who we want to become; shaping decision-making, behaviours and ways of working. We have five core values:



**People at our core**



**Growing every day**



**Safe hands**



**Power of teamwork**



**Sustainable future for all**

You can read more about our values [here](#).

Our role is to connect our customers to the world with great airport experiences and innovative travel services.

Our vision is to be a world-leader in the provision of airport facilities and travel services, delivering value for all our stakeholders. We are on a mission to make our airports and travel services the number one choice for travellers and airlines.

We are working to achieve this through the pursuit of seven strategic priorities:

- 1 Deliver great customer service and operational excellence
- 2 Grow our core airports business
- 3 Invest in our airports to support long-term growth
- 4 Develop and scale CAVU
- 5 Decarbonise aviation
- 6 Achieve sustainable growth in shareholder value
- 7 Develop a brilliant, diverse and inclusive team of people who share our values

# Our risks and how we manage them

We have worked with Slave-Free Alliance to identify the three key areas of risk that modern slavery presents to our business, and which we consider when reviewing risk and developing our plans:



## Our people

MAG colleagues, contractors (including temporary staff) and third-party airport-based colleagues being trafficked or used as modern-day slaves



## Our airports

Our airports being used as a route through which people are trafficked (knowingly or unknowingly)



## Our supply chain

Our suppliers bringing modern slavery into our airports, or allowing it to take place in their operations

## Our people

We believe the current level of risk within the business among colleagues is low. This is due to the highly regulated nature of our business, which requires robust and extensive colleague checks in the recruitment process and ongoing 'in employment' checks for some roles.

We have well established processes in place for reporting concerns through our Whistleblowing Policy, via our external partners Safecall Ltd, or by using the internal grievance process.

As well as our robust vetting and Right to Work checks, face-to-face security vetting interviews are conducted for all new and existing (periodic renewals) colleagues, regardless of role or pass type, with physical ID checks completed at the same time.

MAG has an ongoing requirement for temporary labour, and staff for these roles may be recruited by third party agencies. All agencies are required to complete the modern slavery assessment tool and additional controls are placed on these providers via our contracts. For example, we have a requirement for anyone working in temporary airside roles to be checked for eligibility to work in the UK, and to provide DBS and 5-year HMRC checks to verify each worker's background history including gap references.

Risk is further mitigated for temporary drivers, as the hiring manager is able to carry out biometric checks using the DVLA database.

## Our airports

Human trafficking through our airports is an inherent risk within our business. We continue to work closely with specialists and subject matter experts including Border Force, local Police forces at each airport and the Greater Manchester Modern Day Slavery Business Network, to monitor all operations at our airports in a cohesive way.

We can respond quickly where we believe our airports are being used to facilitate human trafficking and, with the support of these specialists, including our own Chaplaincy team, we are able to manage these cases sensitively and effectively.

## Our supply chain

We are committed to complying with all applicable laws and regulations as well as conducting MAG's supply chain activities in a fair, transparent and professional manner at all times. The MAG supply base incorporates a wide range of goods, works and services, with our Tier 1 preferred suppliers being predominantly (over 90%) UK or EU based.

MAG's preferred suppliers are those that MAG Procurement have agreed to contract or order with following a competitive sourcing process or a direct award. These suppliers have completed a rigorous and robust sourcing process with a pre-qualification stage that checks compliance with the MAG Supplier Code, asks questions on slavery and human trafficking and which sets out MAG's standards across our sustainability agenda, including modern slavery.

MAG's spend profile naturally adopts an associated level of risk that reflects the diversity and range of goods and services used by our airports. Our focus this year is on monitoring, tracking, and influencing our internal spend activities that ultimately impact MAG's risk levels.

This year we have acted across three priority areas to mitigate any additional Modern Slavery risks that are posed by these returning activities:

### Internal systems and governance

We continue to build on our internal systems, processes, and governance. By utilising technology, we aim to create further efficiencies so that the team can focus on strategic category management, making modern slavery supply chain risks more visible and manageable. Our internal processes now include the scope of the financial and non-financial benefits we track.

Non-financial benefits are aimed at reducing the number of transacting suppliers, purchase orders and buying routes. This will provide us with more transparency and control, and a more fit-for-purpose supply chain where we can better collaborate with our suppliers and lower the risk of modern slavery.

### Strengthening our category management

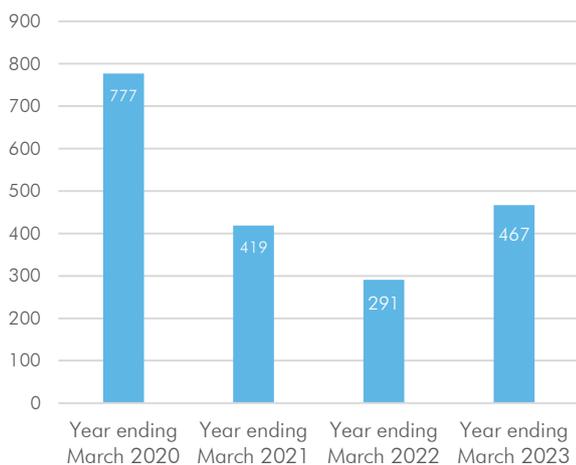
We are actively strengthening our Procurement team by adopting a category management approach. To date we have captured over 80% of our spend across supplied goods, works and services in this way.

Going beyond sourcing and across the procurement lifecycle will unlock new efficiencies in our supply chain, allowing us to work more closely with stakeholders and our suppliers to ensure that modern slavery standards are upheld.

### Supplier Risk Management

We are working with several of our strategic suppliers to broaden how we manage our supply chain risk, so that our risk management processes are better at identifying and responding to modern slavery risk indicators.

Spend by financial year  
£m



## Due diligence in our supply chain

We understand that the role we play in accurately assessing and managing MAG's supply chain risk will enable us to strengthen our internal operations, build on business resilience and ultimately deliver on shareholder value by developing our business in a responsible and sustainable way.

Risk mitigation is built into key areas within our procurement process that carries the most impact in preventing modern slavery risk. All Procurement policies, strategies and procedures are structured to support strategic level compliance standards, as well as operational level delivery and impact within our supply chains.

As part of our standard tender process, MAG Procurement requires suppliers to "pre-qualify" their capability, capacity, and standards. MAG's Supplier Code of Conduct is used as part of this pre-qualification process to set our standards and expectations, including our commitment to the eradication of modern slavery in our supply chain.

MAG standard terms and conditions require adherence with the Modern Slavery Act 2015, continued acceptance of the MAG Supplier Code and the inclusion of robust audit rights.

Building on the commitment to sustainability presented in our Corporate Social Responsibility Strategy "Working together for a brighter future", we now apply a weighting to suppliers' approaches to environmental, social and governance (ESG) issues when awarding

framework agreements. This weighting considers the ways suppliers are working on addressing modern slavery risk.

MAG has partnered with a third-party provider, EcoVadis, whose methodology is used to track, monitor, and report on modern slavery risk within the supply chain. EcoVadis' platform in the future will form part of our pre-qualification approval process and all MAG's preferred suppliers will be required to register on this platform. Going forward, modern slavery risk will be digitally monitored based on country, sector, certifications, and adverse media, in addition to annual fit-for-purpose supplier assessments that produce a supplier sustainability scorecard. Supplier performance is then benchmarked against MAG standards and external key performance indicators and an improvement plan is generated, if required.

Suppliers are supported through online training on various topics within their supply chain with a focus on ESG including modern slavery risk.

Our procurement team is accredited by the Chartered Institute of Procurement and Supply (CIPS), for meeting the CIPS excellence standard in alignment with procurement industry best practice.

CAVU has a separate supply chain process to MAG which draws upon the MAG Procurement process and best practice, with similar standard terms and conditions which require adherence with the Modern Slavery Act 2015.

# Our training and education

As a responsible business, we support our colleagues and suppliers to have the knowledge to spot and report any issues relating to Modern Slavery. All MAG colleagues complete the following training and education activities:

A dedicated **Modern Slavery e-learning training module**, which is part of the onboarding process and refreshed annually, that explains the various types of Modern Slavery and Human Trafficking, how to spot the signs and the various routes to report concerns. The module also tests understanding.

An e-learning education module which requires colleagues to read all Tier 1 policies when they start at MAG and then again on an annual basis. This includes amongst other key policies:

- Modern Slavery
- Employee Code of Conduct
- Whistleblowing
- Anti-bribery and corruption
- People
- Corporate Social Responsibility

We monitor the numbers completed through our eLearning platform.

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## Front-line colleagues receive more in-depth training

Following feedback from Slave-Free Alliance and Border Force at Manchester Airport, we reviewed and updated our front-line training provision. The improvements included the addition of a case study, more updated information and imagery and the content made more practical and direct to enable colleagues to identify and understand the signs to look for more easily.

Each colleague is provided access to the most recent Home Office Modern Slavery Booklet as further reference materials to support them.

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## Procurement colleagues receive additional, specialised training

Given their critical role in managing our supply chain, our colleagues in MAG Procurement complete annual Ethical Procurement and Supply training, which includes modules on modern slavery, anti-bribery, and corruption.

Specific Modern Slavery training was carried out during 2022, by Slave-Free Alliance, to raise awareness and help MAG Procurement to evaluate the modern slavery risk presented by specific supply chains. As a result we have identified a small number of higher risk suppliers and procurements and we are continuing to work with Slave-Free Alliance to manage and mitigate these risks in the most appropriate way.

## Our governance

We recognise that modern slavery is a constantly evolving area and therefore it is important to continue to develop and strengthen MAG's organisational strategy and operational activities accordingly.

Our Modern Slavery Working Group was established in 2019 and continues to drive the development and delivery of our strategy across the Group. This includes ensuring that the recommendations from Slave-Free Alliance and our response are implemented in ways that are effective and proportionate.

This group includes representation from key functions including CSR, Compliance, Operations (covering Manchester, Stansted, and East Midlands Airports), CAVU, Procurement, our Technical Training department, Border Force, Local Airport Police, Chaplaincy, Capital Delivery, Assets, People, and Risk & Audit. The Terms of Reference for this group provide clarity on purpose and accountability and have recently been updated.

The Modern Slavery Working Group reports into MAG's CSR Committee, which has ultimate accountability for our strategy on modern slavery. During the financial year reported on, executive sponsorship of our modern slavery agenda sat with the interim Chief People Officer.

Our modern slavery action plan captures and enables monitoring of progress against our strategy. The Modern Slavery governance processes were reviewed this year by Internal Audit, and several recommendations for improvement have been implemented.

Modern slavery risks are recorded within our company risk management system and our Risk Management team regularly work alongside MAG colleagues to review modern slavery risks across our activities and the three key areas of Operations, People and Procurement.

To ensure appropriate ongoing governance, MAG's compliance with modern slavery requirements has been added to the organisational corporate register. This outlines the risk and details of the controls in place to mitigate it. It also includes further actions, action owners and due dates for implementation. This detail is regularly reviewed as part of MAG's organisational risk management.

Our Whistleblowing procedure and independent hotline (provided via Safecall) enables colleagues to report any concerns relating to modern slavery. In line with this, as part of our monitoring activities we check whether any concerns have been raised regarding modern slavery and during 2022/23 financial year, there were none reported.

## Our Strategic Priorities for 2023/24

Our main focus for this year is to embed the changes we introduced last year to maintain our zero tolerance of modern slavery and work to ensure it can never gain a foothold.

Specifically, within our three main risk areas our priorities are:



### Our supply chain

We will introduce risk management software to enable us to monitor digital information sources and build a sustainable supply chain “baseline” which will allow us to take informed action as required.

We will also continue to work with Slave Free Alliance to finalise our assurance framework for partners at the airports and our construction activities.



### Our people

We will launch updated mandatory annual modern slavery training and proactively monitor completion rates quarterly at the Modern Slavery Working Group meetings to measure our effectiveness.

We will also launch Modern Slavery Champions across our airports, who will be responsible for the coordination and promotion of modern slavery activities within their work locations to continue to raise awareness of how to spot the signs of modern slavery and what actions colleagues at the airport should take.



### Our airports

We will launch a customer awareness campaign at all our airports, to raise awareness and clarify the help and support available. This will include dynamic communications for customers including language adjustments, the targeting of high-risk flights or demographics, the use of key messages on our screens, and helpline numbers in discrete areas such as toilets.

We will also work with on-site partners (such as airport police, Border Force and Chaplaincy) to develop intelligence about modern slavery activities and work with external parties such as Slave-Free Alliance, Greater Manchester Modern Day Slavery Business Network, and all our airports to ensure continuous improvement.