



# LONDON GATWICK

## Slavery and Human Trafficking Statement

Year ending 31 December 2024

The UK Modern Slavery Act 2015 (the 'Act') requires businesses meeting certain criteria to produce an annual statement which sets out the steps they have taken during the financial year to ensure that modern slavery is not taking place in their own business and supply chains.

This is Gatwick Airport Limited's and Ivy Bidco Limited's (together, 'Gatwick Group') statement for the financial year ending 31 December 2024, pursuant to section 54(1) of the Act.



LONDON GATWICK





# An introduction by Stewart Wingate, CEO

Slavery and human trafficking are illegal and unacceptable abuses of human rights and at London Gatwick we are committed to playing our part in helping to eradicate these practices from society and aviation.

Acting ethically drives the decisions and actions we take at London Gatwick every day and is a key part of how we deliver our vision **to be the airport for everyone, whatever your journey.**

Safety and security underpins everything that we do, and we recognise the critical and unique role we play in protecting the millions of passengers who travel through our airport each year from human trafficking and other human rights abuses.

This is why we are committed to continuously improving our approach to prevention, by designing, implementing, and promoting effective policies and practices, both within our own operations and within our supply chains.

This statement was approved by the Board of Gatwick Airport Limited on 25 June 2025 and the Board of Ivy Bidco Limited on 25 June 2025.

**Stewart Wingate**

Chief Executive Officer, London Gatwick

25 June 2025



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# Governance

Overall governance and progress monitoring of our modern slavery and human trafficking prevention programme is overseen by the Risk and Compliance Board (the 'RCB').

The RCB is an executive management sub-committee reporting to the Audit, Risk and Finance Committee (a sub-committee of the Board of Directors of London Gatwick).

The Modern Slavery Working Group is a delegate of the RCB and designs and delivers London Gatwick's modern slavery and human trafficking prevention programme. The working group brings together multidisciplinary expertise from within London Gatwick to facilitate a more integrated approach to tackling modern slavery and human trafficking within our business and supply chains.

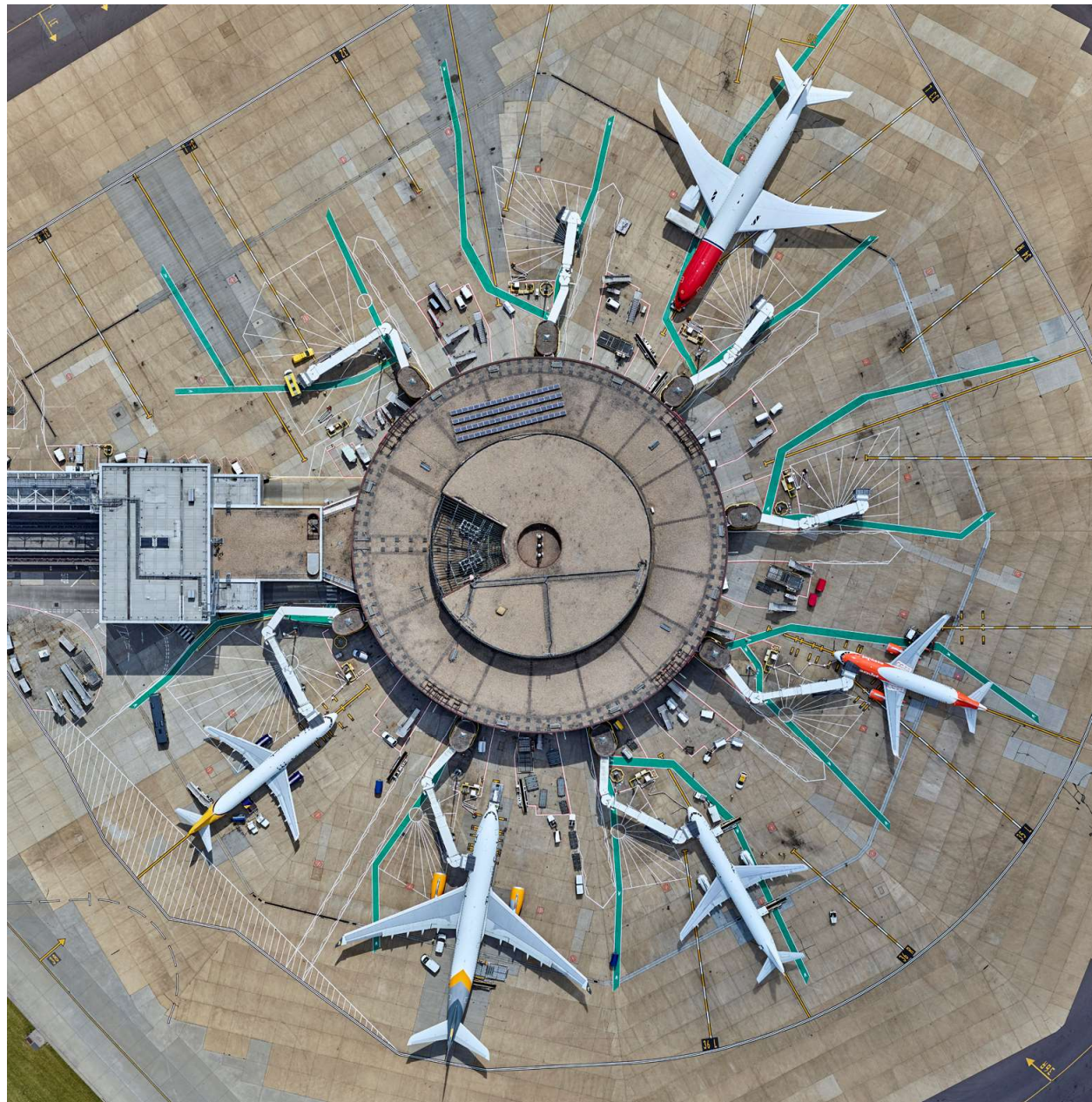
# Our business and supply chains

## Our operations

As one of the major UK airports, we are committed to providing the best service and experience to our passengers, with safety and security central to everything we do.

London Gatwick is licensed to operate the airport by the Civil Aviation Authority (CAA).

We provide links to many destinations for both leisure and business, serving 43.2 million passengers in 2024.







## Ownership

The Gatwick Group is ultimately owned by VINCI SA (VINCI). Global Infrastructure Partners and VINCI Airports are owners.

VINCI Airports, member of the VINCI Group, as the world's leading private airport operator in the world, manages the development and operation of more than 70 airports in 14 countries in Europe, Asia, Africa and the Americas. Served by more than 300 airlines, VINCI Airports' network handled 318m passengers in 2024, ahead of 2019 levels. Through its expertise as a comprehensive integrator, VINCI Airports develops, finances, builds and operates airports, leveraging its investment capability and know-how in optimising operational performance, modernising infrastructure and steering environmental transition. VINCI Airports' annual revenue in 2024 was €4.5bn, ahead of 2019. For more information, visit [www.vinci-airports.com](http://www.vinci-airports.com).

Global Infrastructure Partners (GIP), a part of BlackRock, is a leading infrastructure investor that specializes in investing in, owning and operating some of the largest and most complex assets across the energy, transport, digital infrastructure and water and waste management sectors. GIP has approximately \$170 billion in assets under management. GIP believes that its focus on real infrastructure assets, combined with its deep proprietary origination network and comprehensive operational expertise, enables it to be responsible stewards of investor capital and to create positive economic impact for communities. For more information, visit [www.global-infra.com](http://www.global-infra.com).

For a detailed description of our ownership structure, governance, services, and operations, please visit our [website](#).



Our Second Decade of Change builds on progress made in previous years and accelerates action through ten goals focused in areas that matter the most to our business: people and communities, net zero and the local environment.

Our goals are at the heart of everything we set out to achieve and align with the United Nations Sustainable Development Goals.

People and communities is a key pillar of our [Decade of Change Policy](#). For further information about our Decade of Change see [here](#).

## Our workforce

At London Gatwick, we work together across the airport to deliver a great experience for our passengers, to ensure we are the airport for everyone, whatever your journey.

We directly employ over 2,500 people, with a large percentage of our employees being represented by trade unions, and the remainder being represented by colleague representatives.

We also use contractors, agency workers and managed service companies to support our operations. We don't directly employ seasonal workers.

We're passionate about our diverse and inclusive place to work. Different perspectives and backgrounds help us to be more innovative and creative, engaging our people along the way. We're proud to have four people-led Business Resource Groups challenging us to be more inclusive, tackling bias in the workplace, and ensuring everyone can develop their careers, while providing the best experience to all our passengers.



## Our structure

Our business is organised into several areas, including:



**Operations** (including Aerodrome, Engineering, HSE, Passenger Operations, Sales and Operational Planning, Security and Stable Operations).



**Commercial** (including Marketing, Airline Relations, Retail, Real Estate, Surface Access, Car Parks and E-Commerce).



**Finance** (including Finance, Business Assurance, Economic Regulation, Insurance, and Procurement).



**Corporate Affairs** (including Communications, Planning, Airspace Strategy and Noise, and External Engagement and Policy).



**Technical** (including Development, Innovation, Construction, IT and Sustainability).



**Human Resources and Legal.**

## Our supply chain

Our global supply chain covers a wide range of products, works and services, broadly grouped as follows:

- capital expenditure (including construction, professional services and capital products);
- engineering and utilities, maintenance and facilities management;
- corporate and professional services (including marketing);
- passenger services;
- airport operations;
- office services, supplies, uniforms and travel; and
- IT services and telecoms.

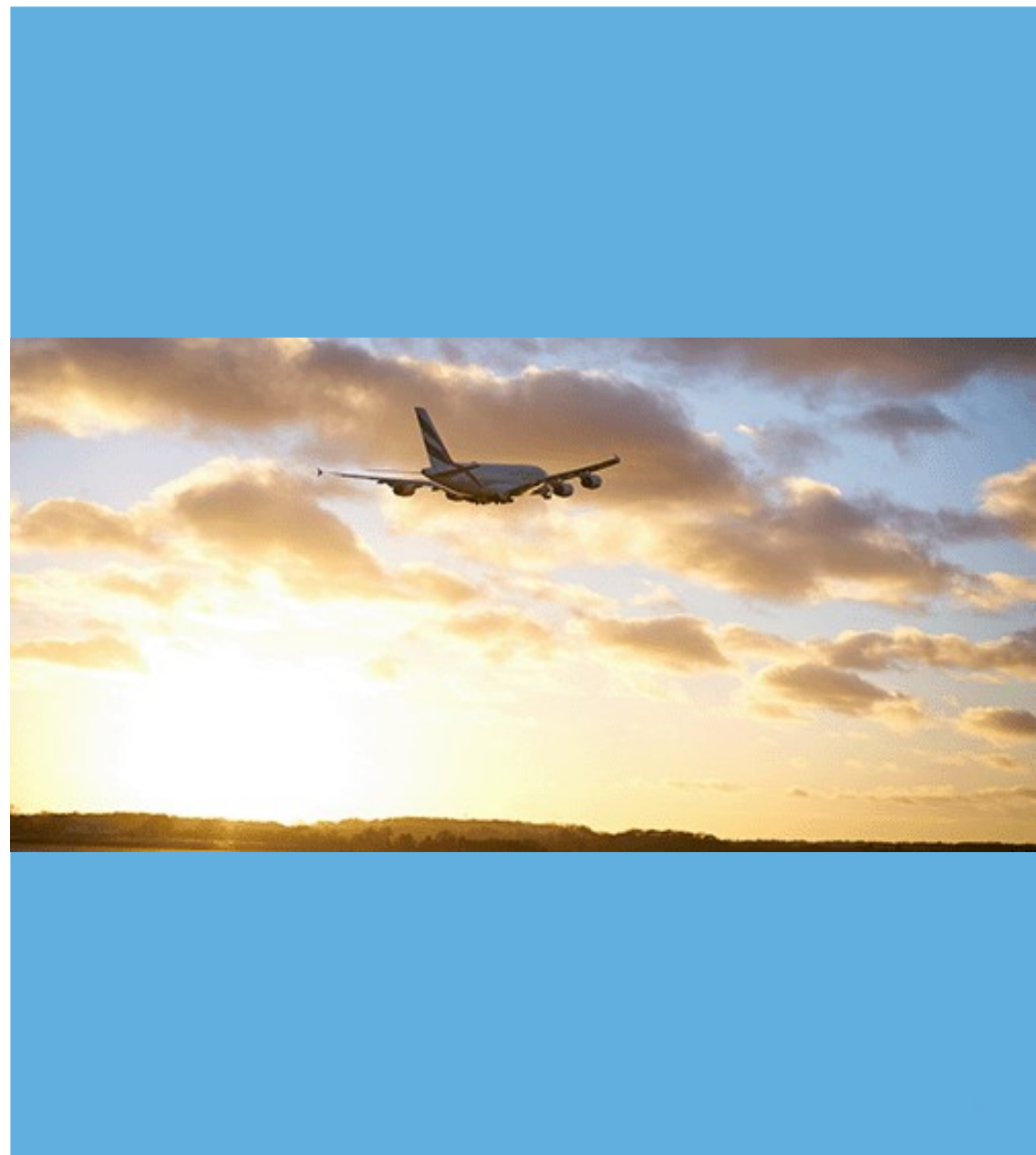
## Our commercial partners

We work with a diverse portfolio of airlines, to meet the growing demands of our passengers. We also work with a range of retail and service partners across the airport to maintain our high service standards, including offering premium products and lounges, along with a range of retail outlets and restaurants to best suit the needs of all our passengers.

## Our security partners

London Gatwick works closely and collaboratively with UK Border Force, the police and other agencies operating at the airport to assist them in detecting and disrupting potential occurrences of slavery and human trafficking. This includes supporting with operations such as:

- Project Servator deployments;
- Operation Limelight, a multi-agency operation between Border Force and Sussex Police, supported by London Gatwick, raising awareness of harmful practices such as forced marriage and FGM, and disrupting the movement of people to engage in such practices, or who may be subject to such practices outside the UK;
- Operation Aidant, a multi-agency operation designed to tackle modern slavery and human trafficking;
- Operation Indicator. This operation is run by Sussex Police and asks hotel owners and staff to look out for suspicious signs and activity from visitors and guests that may indicate that a person could be at risk of being exploited.





# Our policies relating to modern slavery

London Gatwick's Modern Slavery Policy and guidance are set out within our Standards of Behaviours intranet. The policy, supported by London Gatwick's Third Party Risk policy and London Gatwick's Business Partner Commitment policy,

- confirms our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains;
- confirms our commitment to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains;
- confirms that we expect the same high standards from all of our contractors, suppliers and other business partners;
- acknowledges that we have a special responsibility as an airport to do all we can to prevent our facilities being used by human trafficking or slavery networks, and to assist those who may be vulnerable to being trafficked or held in slavery;
- confirms that the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control;
- provides guidance on how to raise concerns, suspicions or questions about modern slavery and human trafficking;
- provides guidance on the warning signs to look for on our airport premises.

## London Gatwick's Serious Concerns Policy:

London Gatwick manages an external helpline (EthicsPoint) for employees and business partners to confidentially report concerns in any area of our business, including concerns about slavery or human trafficking.



## Assessing modern slavery risks

In 2017 we conducted a risk assessment with support from Good Corporation to identify modern slavery risks in:

- our own operations;
- the operations of our supply chain partners; and
- the operations of our commercial partners.

We keep the results of our risk assessment under review.

In 2024, GAL conducted a gap analysis of its Modern Slavery programme against BS25700 (Organisational Responses to Modern Slavery), to develop roadmap for enhancements to our Modern Slavery Programme. As part of this roadmap, GAL commenced a refresh of its Modern Slavery Risk Assessment.

# Our shareholders' policies relating to modern slavery

## Activities of the VINCI Group

As part of the [VINCI Group](#), London Gatwick shares the sustainability commitments outlined in the VINCI Manifesto, Code of Ethics and Conduct and Guide on Human Rights. These commitments support our vision and values at London Gatwick.

In 2003, the VINCI Group voluntarily took the step of signing the United Nations Global Compact whereby it undertakes to respect human rights internationally and to ensure that it does not become complicit in breaches of those rights.

The [VINCI Code of Ethics and Conduct](#) lays down the principles of business ethics which guide conduct under all circumstances. The [VINCI Guide on Human Rights](#) provides a common set of guidelines on how to handle issues concerning human rights. The guidelines are based on the principles of the Universal Declaration of Human Rights (UDHR), on the eight fundamental Conventions of the International Labor Organisation (ILO) and on the OECD Guidelines for Multinational Enterprises.

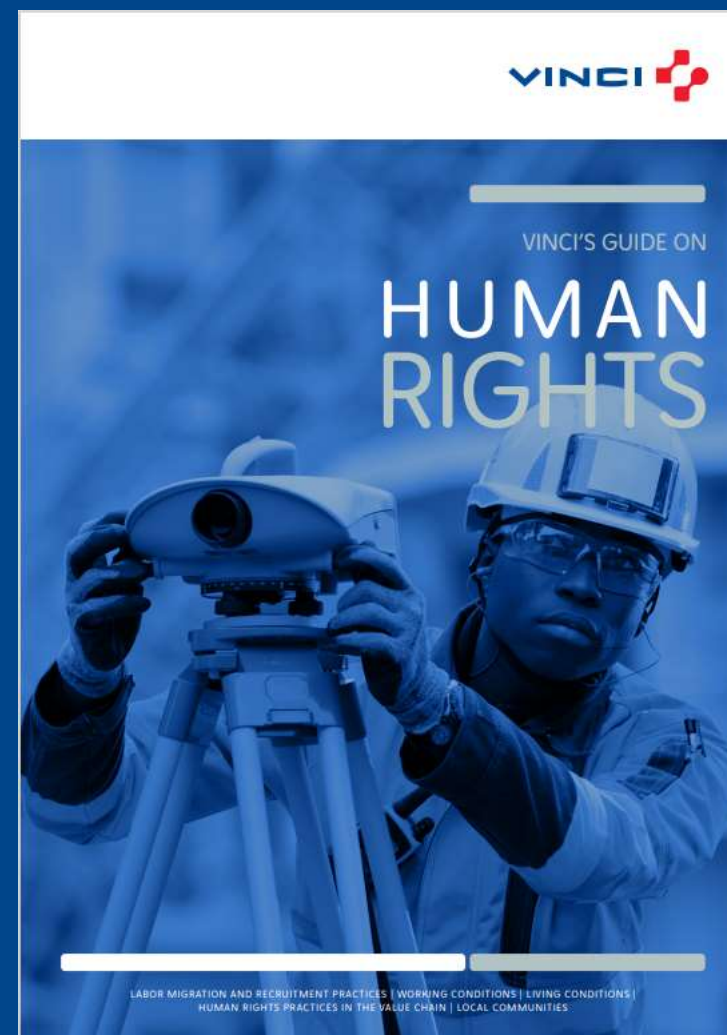
VINCI companies and their employees undertake to avoid any human rights violations, including in the following areas:

- labour migration and recruitment practices;
- working conditions;
- living conditions;
- human rights practices in the value chain; and
- local communities.

In each of these areas, VINCI's Guide on Human Rights provides recommendations to help prevent the risk of human rights violations.

## Activities of GIP

London Gatwick's policies are also supported by GIP. Further information regarding GIP's modern slavery programme may be found [HERE](#).





# Due diligence

We care about who we do business with. We adopt a risk-based due diligence approach in respect of our supply chain, as follows:

- we include assessment questions relating to modern slavery in our request for information form (for central and construction procurement) and pre-qualification questionnaire (for capital projects, to align with PPN 03/23);
- our central and construction procurement templates include provisions on modern slavery, including an obligation to ensure compliance down the supplier's supply chain. Where we are contracting on supplier terms, we look to ensure that modern slavery provisions are included (albeit many supplier pro-forma contracts already include modern slavery provisions).

In 2024, for central and capital procurement we commenced an assessment of our:

- top-spend supplier base (approximately 150 suppliers) via the Ecovadis platform, to evaluate and manage environmental, labour and human rights, ethical trading and sustainable procurement risks;
- third party service agreements (approximately 42 suppliers), as we work towards our own accreditation to the [Living Wage Foundation](#).

We conduct ad-hoc audits of our supply chain, which includes an assessment of modern slavery risks.

## Recruitment and vetting

All London Gatwick employees and many of our on-site business partner's employees are background checked in line with aviation security regulations. This includes employment referencing and identity verification, as well as right to work checks. These measures offer effective mitigation against the risk of modern slavery amongst our own employees, and those of our business partners who require an airport ID pass to access our facilities.

# Awareness raising and capacity building

## In 2024:

- given their critical role in overseeing our supply chain, our CIPS members in the Procurement team completed the [CIPS Ethical Procurement & Supply e-learning and test](#);
- we ran training on human trafficking as part of our Aviation Security Managers course. This included training for employees of both London Gatwick and our business partners;
- we began work on a new dedicated slavery and human trafficking module as part of our Standards of Behaviours training;
- we supported "It's a Penalty" campaign as part of the Paris Olympics;
- we created and distributed a human trafficking "spot the signs" poster as part of our Anti Slavery day to all front line staff;
- we commenced designing a front line face to face training programme on modern slavery for our security staff. This will be delivered in 2025.
- we built our standards of behaviour microsite on slavery/ human trafficking



### The Behavioural Detection Team

The London Gatwick Behavioural Detection Team are trained in techniques to identify and question individuals who appear to be under stress and/or duress. The team intercede where appropriate and escalate to relevant authorities. In this way they are able to intervene when there is a concern for a person that may be being trafficked or subjected to harmful practices



## Assessing our impact

In 2025 and beyond, we will use the following key performance indicators to track our progress :

| By end of | Target  | Measure   |
|-----------|---|---|
| 2025      | 50% of employees* in front line security roles to have received our training pack on human trafficking. | % of employees in front line security roles who received the training pack. |

\*All FTE employees in post as of 1 January 2025

## Looking forward to 2025

In 2025, our roadmap for delivery of our Modern Slavery Programme will commit to:

- (i) update our risk assessments,
- (ii) roll out our Standards of Behaviours training which includes a module on human trafficking,
- (iii) develop enhanced training for most exposed populations;
- (iv) engaging with our controlling authorities to identify our training needs (including Border Force)



Our London Gatwick Modern Slavery Working Group will meet quarterly to continue to develop and enhance our modern slavery and human trafficking prevention programme.