



LONDON GATWICK

Slavery and Human Trafficking Statement

Year ending 31 December 2025

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 2025, pursuant to section 54(1) of the Act.



LONDON GATWICK





Introduction by our CEO Pierre-Hugues Schmit

At London Gatwick, we remain firmly committed to upholding the highest standards of ethical conduct and human rights across all areas of our business and supply chain. As a key UK infrastructure operator, we recognise the influence we hold and the responsibility that comes with it.

In 2025, we strengthened our supplier due diligence, further embedding modern-slavery-related controls within our procurement processes, and delivering targeted training to teams operating in higher-risk areas. We also expanded our assessment of key suppliers, helping us to improve visibility and oversight. Furthermore, we continued to promote a culture where concerns can be raised confidentially and without hesitation.

In 2026, we will continue to refine our processes, engage proactively with suppliers, and align our approach with evolving best practice to ensure our standards remain robust.

*This statement was approved by the Board of Gatwick Airport Limited and the Board of Ivy Bidco Limited on **02 April 2026**.*

Pierre-Hugues Schmit

Chief Executive Officer, London Gatwick



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Governance

The Modern Slavery Working Group 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 an integrated approach to tackling modern slavery and human trafficking within our business and supply chains.

The working group is a delegate of the Risk and Compliance Board (the 'RCB'), an executive management sub-committee which oversees and monitors progress of our modern slavery and human trafficking prevention programme.

The RCB reports to the Audit, Risk and Finance Committee, a sub-committee of the Board of Directors of London Gatwick..

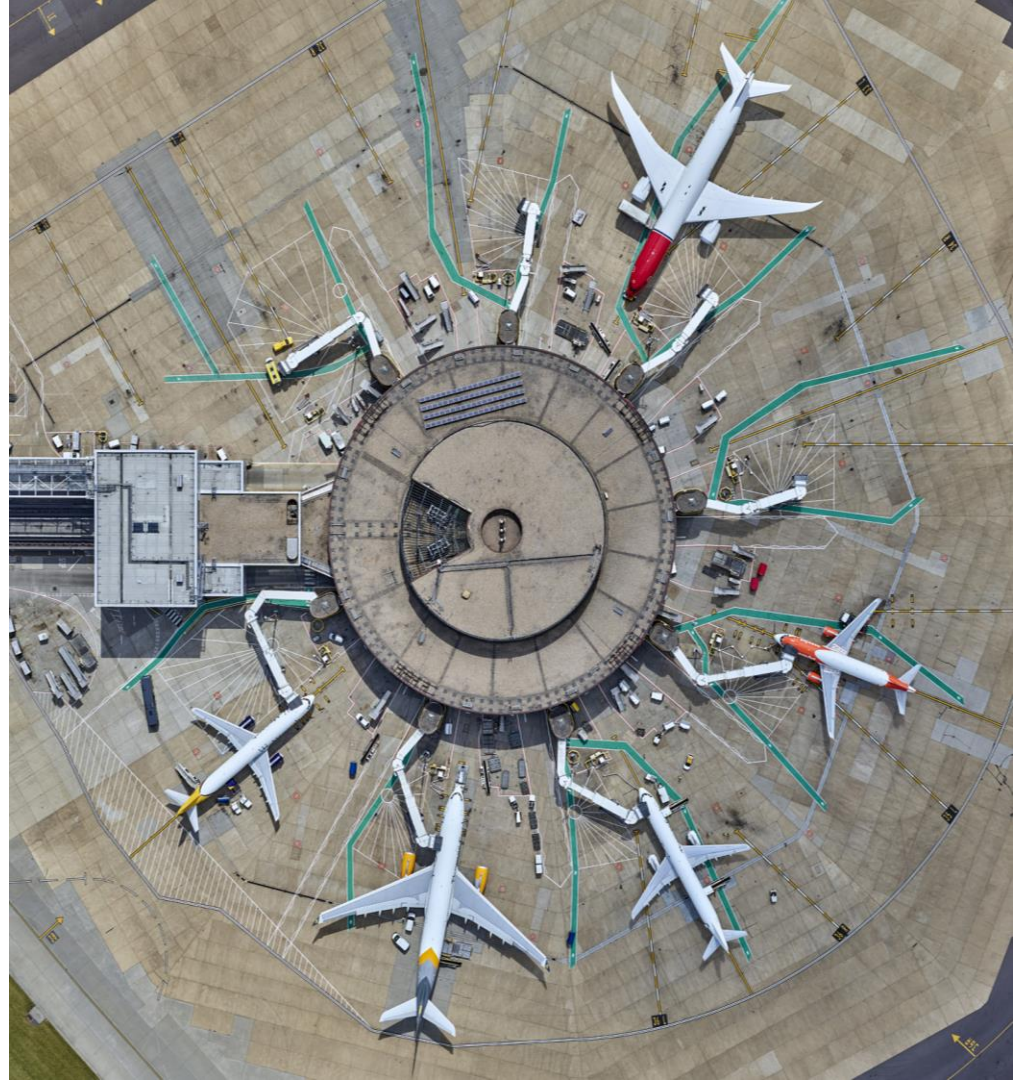
Our business and supply chains

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 42.8 million passengers in 2025.





Ownership

The Gatwick Group is ultimately owned by VINCI SA (VINCI) and a consortium of investors managed by Global Infrastructure Partners (part of BlackRock).

VINCI Airports, a member of the VINCI Group and the world's leading private airport operator, manages the development and operation of more than **70** airports across **14** countries in Europe, Asia, Africa and the Americas. Served by more than **300** airlines, its network handled approximately **334 million** passengers in 2025, representing around **5% growth** compared to 2024 and exceeding pre-pandemic levels. VINCI Airports applies an integrated model spanning investment, development, construction and operation, with a focus on operational performance, infrastructure modernisation and environmental transition. At Group level, VINCI SA reported total revenue of approximately **€75.4 billion** in 2025 (**around 4% year-on-year growth**), with net profit of approximately €4.9 billion. For more information, visit <https://vinci-airports.com>.

Global Infrastructure Partners, 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 in the energy, transport, digital infrastructure, and water and waste management sectors. It manages approximately USD 193 billion in assets on behalf of its investors and focuses on long-term ownership and operational improvement of large-scale infrastructure assets. Its portfolio companies employ over 128,000 people globally as of 31. September 2025. For more information, visit 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 the [Performance Summary 2025](#) and 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 2,600 people, with a large percentage of our employees being represented by trade unions, and the remainder being represented by colleague representatives. Our average full-time equivalent (FTE) headcount was 2,653 in 2025, up 3.5% from 2,563 in 2024. In 2025, we recruited 248 new colleagues; applications from individuals indicating they belong to a minority ethnic group rose from 15% in 2024 to 22% in 2025.

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 help detect and disrupt potential occurrences of slavery and human trafficking. This includes supporting initiatives, aimed at spotting suspicious activity and protecting vulnerable individuals, as follows:

- **Project Servator** deployments: a policing tactic using visible and covert patrols to deter and detect criminal activity, including human trafficking.
- **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;
- **Working with anti-slavery charities** (*not always publicly named*): to support and advise vulnerable passengers who may be victims of human trafficking.

Through these initiatives, Gatwick helps strengthen the airport's resilience against exploitation and contributes to broader national efforts to combat modern slavery.



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 our business dealings and relationships;
- reinforces our commitment to enforcing effective systems and controls to ensure modern slavery does not occur in our business or supply chains, and we expect the same high standards from all contractors, suppliers, and business partners, who must comply with labour and human rights laws and ensure their own suppliers uphold these standards;
- acknowledges our special responsibility as an airport, to prevent our facilities being used by human trafficking or slavery networks, and to assist vulnerable individual;
- 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, including 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 modern slavery or human trafficking.



Assessing modern slavery risks

We conduct regular risk assessments to identify modern slavery risks across our operations, supply chain and commercial partnerships, ensuring emerging risks are addressed.

In 2024, we conducted a gap analysis of its Modern Slavery programme against the BS25700 standard to develop a roadmap for enhancements and refresh our Modern Slavery Risk Assessment.

Our Second Decade of Change Sustainability Policy, guiding our long-term commitment to ethical business practices, identifies construction, facilities management, catering, and ground handling as sectors with elevated labour exploitation risk due to subcontracting, agency labour, and migrant worker populations. These sectors remain a priority in our risk assessments.

Recruitment of additional airport security officers to support the UK Government's Next Generation Security Screening process increases focus on modern slavery oversight in these labour-intensive roles. We continue to strengthen due diligence and supplier management to maintain visibility of labour practices and guard against exploitation.

The Board's Audit, Risk and Finance Committee reviews and approves our annual Modern Slavery Statement to ensure accountability.

Our shareholders' standards and policies

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.

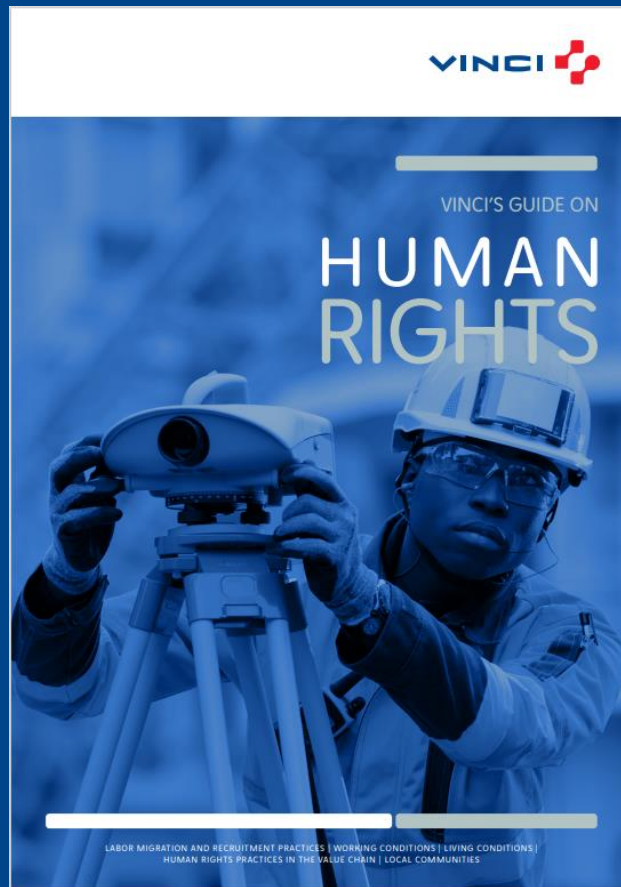
The [VINCI Code of Ethics and Conduct](#) lays down the principles of business ethics which guide conduct under all circumstances. The [VINCI Guide on Human Rights](#) provides a common set of guidelines on how to handle issues concerning human rights. The guidelines are based on the principles of the 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

In line with our fiduciary responsibility to limited partners and stakeholders, ESG has long been at the core of GIP's investment approach, believing that respecting environmental, health & safety, labor, social, governance and business integrity considerations underpins GIP's license to operate largescale, critical national and economic infrastructure. This includes the management of supply chain risks, labor and working conditions, including human rights and modern slavery, at our portfolio companies, including London Gatwick.

GIP recognizes that a critical part of being a good steward for our investors is ensuring that GIP, as well as our portfolio companies, maintain sound and ethical governance practices. A part of BlackRock, GIP has assumed a comprehensive governance approach to human rights, labor standards and modern slavery applying to our firm and suppliers. Human rights are a fundamental concern for BlackRock in its relationships with employees and suppliers. BlackRock commits to respect human rights in accordance with internationally accepted standards, such as the United Nations Guiding Principles for Business and Human Rights and the International Labour Organization's Core Conventions. Further information on the policies on BlackRock's approach and policies, that apply to GIP, are available [here](#).



Due diligence

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

- we include assessment questions on Modern Slavery in our Request for Information form (for central procurement) and in our Pre-Qualification Questionnaire for capital projects, aligned with PPN 03/23.
- 100% of construction suppliers are assessed via a PQQ, and all active construction contracts include Modern Slavery clauses and Living Wage clause.
- our central 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 2025, for central procurement:

- 121 of our key suppliers were assessed via the EcoVadis platform, against labour and human rights, and environmental and ethical trading standards, achieving an average score of 68%;
- we conducted 118 supplier due diligence reviews via the ADIT process; and
- continued to review our third party service agreements, in support of our commitment towards [Living Wage Foundation](#) accreditation.

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

In 2025:

- given their critical role in overseeing our supply chain, our Procurement team CIPS members completed the [CIPS Ethical Procurement and Supply e-learning & Test](#) and Vinci's **Buying Responsibly** course;
- we partnered with UK charity A21, to train frontline staff to recognise warning signs of human trafficking and respond appropriately;
- we developed and conducted a **Vulnerability Recognition and Response** training course for Security staff, covering human trafficking and modern slavery;
- we displayed A21 signage throughout the arrivals journey, to guide those who may need help;
- we finalised a new ethics training programme, including a modern slavery module, for rollout in 2026
- we aligned our modern slavery awareness programme with our Second Decade of Change Goal 2 (Opportunity and Accessibility) and Goal 3 (Workplace Safety), embedding human rights into our broader sustainability commitments.



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 2026 and beyond, we will use the following key performance indicators to track our progress:

By end of	Target	Measure
2026	100% of employees* in procurement roles to have completed our SoB training and the Vinci training on human rights.	% of employees in procurement roles who received the training.

Looking forward to 2026

In 2026, our roadmap for delivery of our Modern Slavery Programme is committed to:

- (i) completing the refresh of our Modern Slavery Risk Assessment
- (ii) implementing a Corrective Action Plan (CAP) process for suppliers identified, via EcoVadis reviews, as having elevated labour and human rights risks;
- (iii) expanding modern slavery training, beyond security and procurement staff; to all exposed populations.
- (iv) pursuing Living Wage Foundation accreditation, continuing our review of third-party service contracts.



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

