

Heathrow

# Modern Slavery and Human Trafficking Statement 2025



# CONTENTS



# INTRODUCTION



At Heathrow, operating as a responsible business is fundamental to how we deliver for our passengers, colleagues and partners. As one of the world's busiest international airports, we recognise the scale of our operation and our responsibility to address risks related to modern slavery and human trafficking.

This statement sets out the steps we have taken in 2025 across our operation, workforce and supply chain. We have strengthened governance, improved how we identify and prioritise risk, and expanded training to ensure colleagues can recognise and respond to potential concerns. We have also deepened engagement with our suppliers, reinforcing expectations and supporting them to meet consistently high standards.

While progress has been made, this remains an ongoing priority. We recognise that modern slavery risk is complex and not evenly distributed, and we remain focused on targeting efforts where risk is greatest, working with partners and suppliers to improve visibility and strengthen controls.

**THOMAS WOLDBYE**  
Chief Executive Officer



Heathrow's tenth Modern Slavery Statement (the "Statement") is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 December 2025.

It sets out the steps we have taken to prevent modern slavery and human trafficking from occurring in our own operations and our supply chain. It has been approved by the Board of Directors of Heathrow Airport Holdings Limited ("Heathrow") on 26 June 2026 on behalf of the relevant companies of the Heathrow Group (as defined below) including those listed in Annex 1. Information set out in this Statement is correct as of 26 June 2026.

# ABOUT HEATHROW

Heathrow is Britain's busiest airport and the UK's gateway to growth, connecting over 84 million passengers, transporting approximately 25% of the UK's cargo and boosting trade and tourism in every region.

Heathrow is more than just an airport. It's a complex operational environment where safety, security and reputation are essential and the trust and loyalty of our customers, cultivated by colleagues through customer service, are key in helping us achieve our vision to be an extraordinary airport, fit for the future.

Over 80,000 people work across the airport, making it the UK's largest single-site employer – the airport directly employs about 10% of them.

**+80,000**

people working across

*Team*  
**Heathrow**

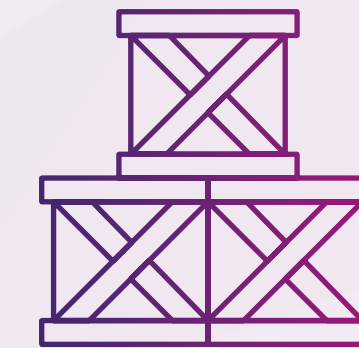


**+230**  
**DESTINATIONS  
SERVED**

**25%**

**UK'S CARGO**

transported annually



**+84 MILLION**

passengers served in 2025

**£3,623M**

total revenue in 2025



**330+**  
**RETAIL UNITS**

**1,300**

flights served each  
day from Heathrow



**80 YEARS**

Celebrating 80th birthday  
of flights from Heathrow

# CORPORATE STRUCTURE

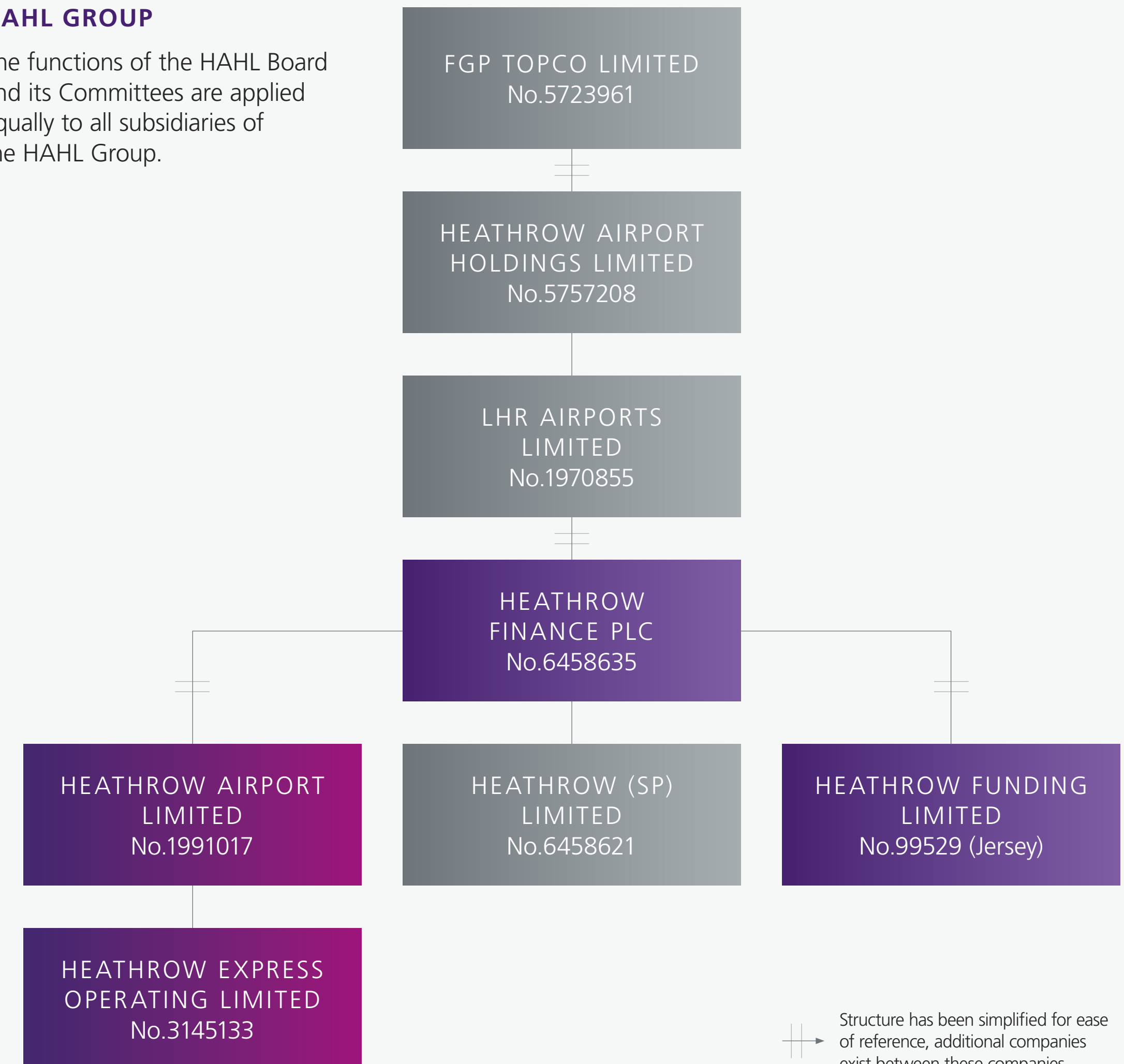
Heathrow Airport Holdings Limited (the 'Company' or 'HAHL') is the holding company of a group of companies that owns Heathrow Airport and operates the Heathrow Express Rail Service (the 'HAHL Group').

The Board of Directors of HAHL determines the long-term strategy of the HAHL Group, ensuring that it acts ethically, has the necessary resources to meet its objectives, monitors performance, and meets its responsibilities as a major airport group. The ultimate parent company of the HAHL Group is FGP Topco Limited.

A simplified structure of FGP Topco Limited and its subsidiaries is illustrated in the diagram opposite.

## HAHL GROUP

The functions of the HAHL Board and its Committees are applied equally to all subsidiaries of the HAHL Group.

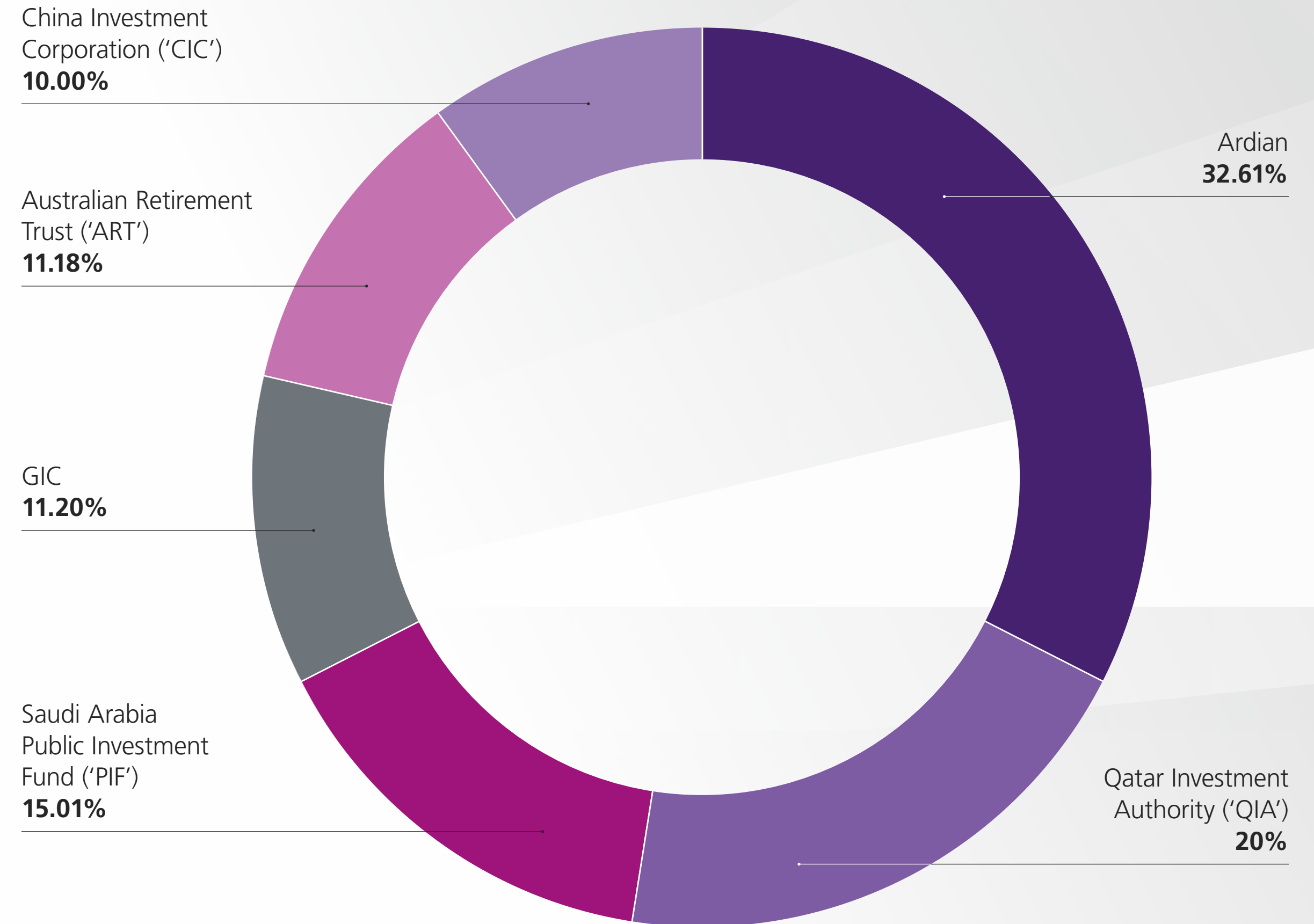


# OWNERSHIP

The HAHL Group is owned by a consortium of investors (the 'Shareholders') who hold shares in FGP Topco Limited. Details of the Shareholders' equity interests, as at 31 December 2025, are shown in the chart opposite.

## SHAREHOLDERS (% HELD)

- Ardian – 32.61%**  
InfraEuropa SCA (an investment vehicle managed by InfraEuropa Management Sarl)
- Qatar Investment Authority ('QIA') – 20.00%**  
Qatar Holding Aviation (a wholly owned subsidiary of Qatar Holding LLC)
- Saudi Arabia Public Investment Fund ('PIF') – 15.01%**  
Alrahala First Investment Company (wholly owned by PIF)
- GIC – 11.20%**  
Baker Street Investment Pte Ltd (an investment vehicle managed by GIC Special Investments Pte. Ltd)
- Australian Retirement Trust ('ART') – 11.18%**  
QS Airports UK, LP (an investment vehicle managed by ART Asset Operations Limited)
- China Investment Corporation ('CIC') – 10.00%**  
Stable Investment Corporation (an investment vehicle of the China Investment Corporation)

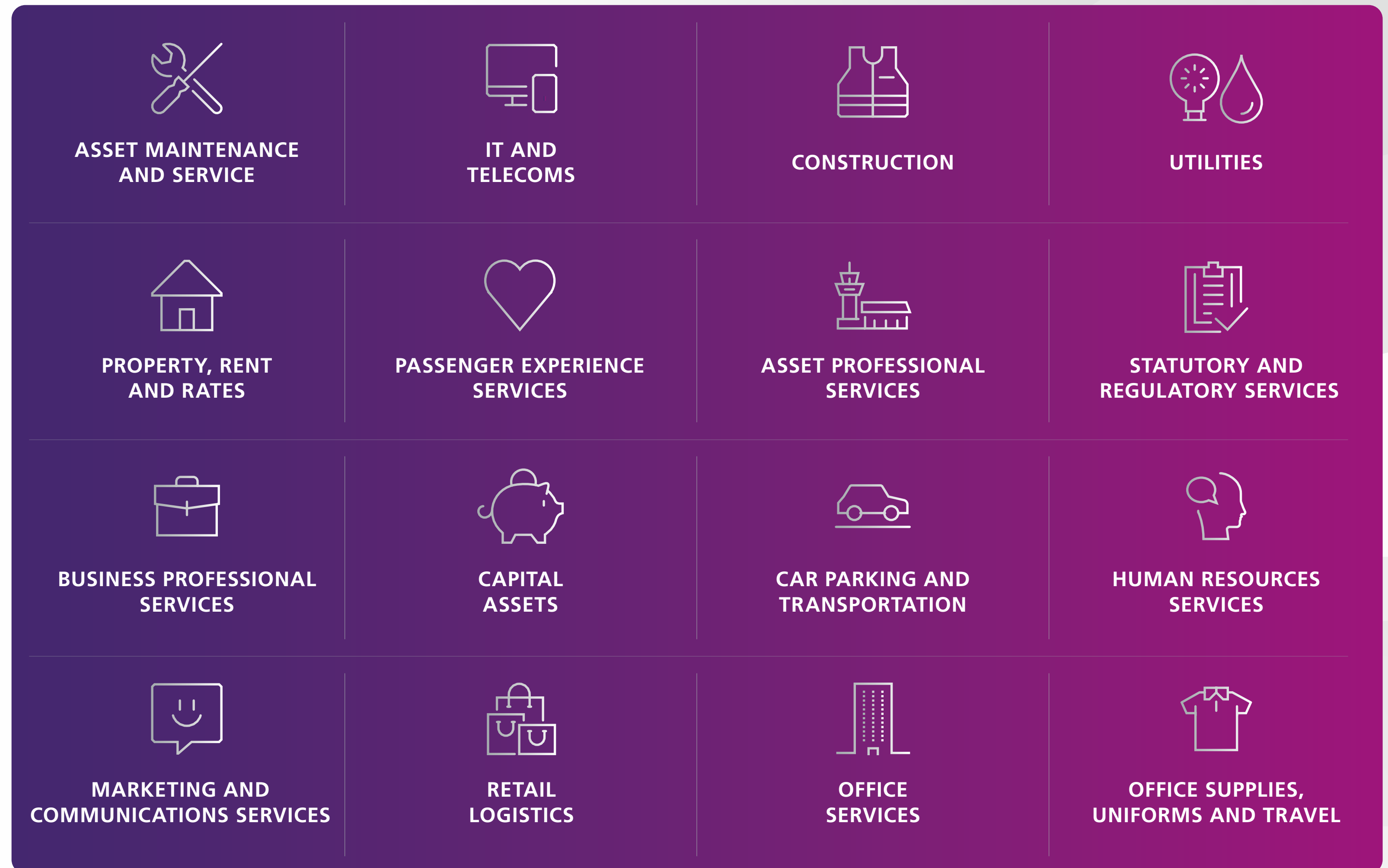


# OUR SUPPLY CHAIN

Heathrow's operation is enabled by our comprehensive supply chain, encompassing a range of products and services across multiple industry sectors.

In 2025, we were supported by over 1,250 suppliers, of which more than 1,000 are headquartered in the UK.

Our suppliers are spread across the following categories:



# GOVERNANCE AND POLICIES

## GOVERNANCE STRUCTURE

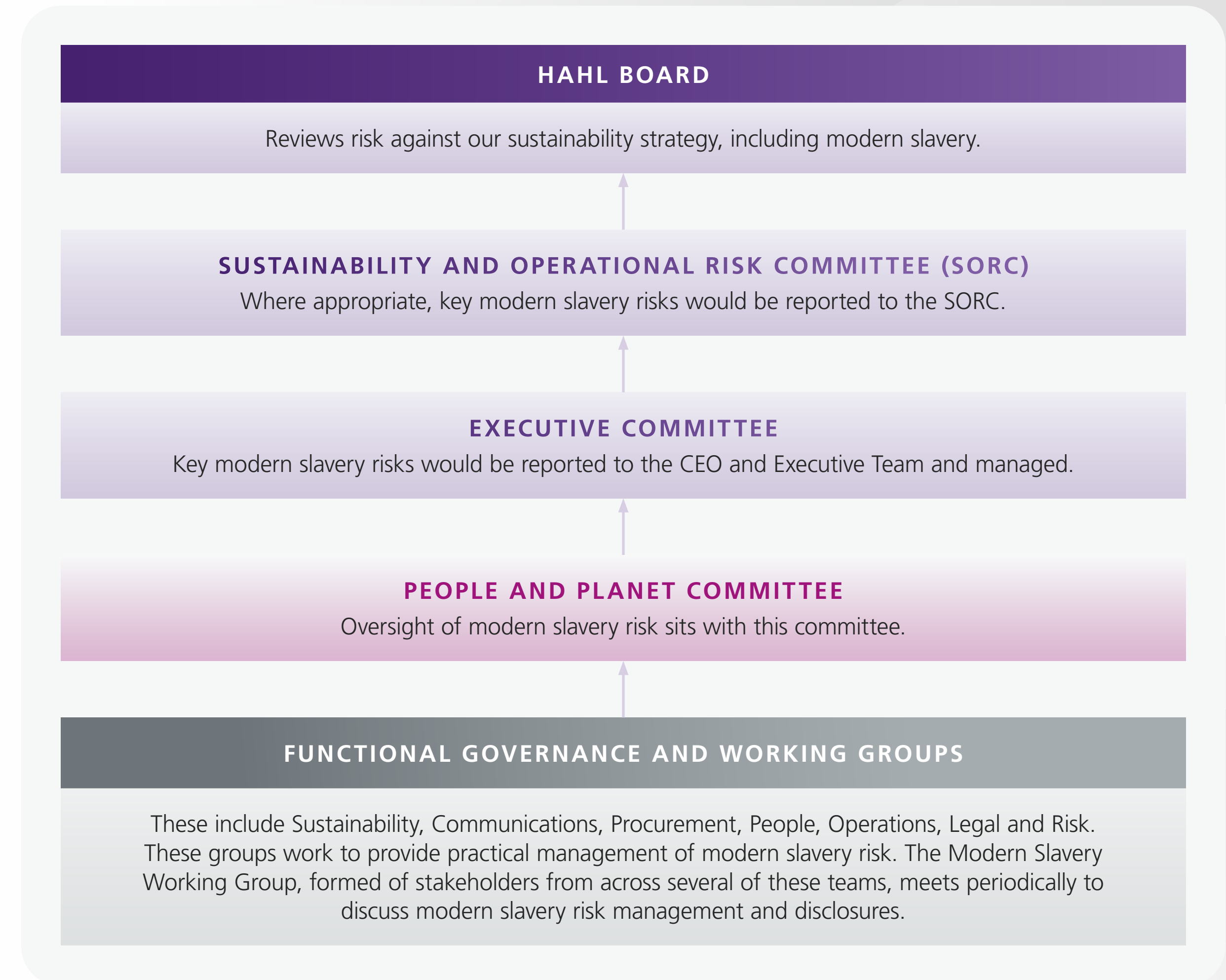
Heathrow has a robust top-down governance structure to manage modern slavery risk. Ultimate accountability sits with the HAHL Board. The airport also has a suite of policies that guide our approach to managing modern slavery and mitigating risk within our operations and supply chain.

Oversight of modern slavery sits with the People and Planet Committee, which is a formal sub-committee of the Executive Committee formed by our Chief Executive Officer. The Committee was formed in July 2025 to replace the previous ESG Committee.

Strategic decision making and risks and opportunities associated with wider sustainability topics - including modern slavery - are discussed at bi-monthly meetings. The People and Planet Committee provides regular updates to the Executive Committee.

Individuals within Heathrow's management team also engage with industry and drive formation of action plans that are aligned with industry best practice.

Functional groups with Director-level sponsorship are responsible for delivering strategic and day to day workstreams, as well as working with partner agencies and suppliers to manage modern slavery risk.



GOVERNANCE AND POLICIES (CONTINUED)

TABLE OF POLICIES

| Policies                   | Current standing and progress                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Professional Conduct       | <ul style="list-style-type: none"><li>• Sets out requirement for Heathrow and our colleagues to operate within laws and professional standards, including those pertaining to modern slavery in employment and supply chain dealings.</li><li>• Requires compliance with the internal governance processes through which corporate operations and decision making occurs.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Recruitment and Secondment | <ul style="list-style-type: none"><li>• Sets out Heathrow’s commitment to ensuring that due process is followed during the recruitment process. This ensures that key criteria including right-to-work and any necessary background checks are undertaken to mitigate risk of exploitation and modern slavery risk.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Modern Slavery             | <ul style="list-style-type: none"><li>• Sets out Heathrow’s approach to maintaining and enforcing effective systems and controls to prevent modern slavery and human trafficking within our business and supply chain.</li><li>• Clarifies each individual’s role in complying with applicable laws and safeguarding vulnerable persons against modern slavery and human trafficking.</li><li>• Provides clear guidance explaining the concepts of modern slavery and human trafficking, and what needs to be done if an individual suspects modern slavery or human trafficking is taking place at Heathrow Airport or in our supply chain.</li><li>• Makes it clear that Heathrow expects our supply chain to comply with the requirements of the Policy, including that Heathrow Business Partners are expected to conduct themselves in accordance with the standards set out in the Policy.</li><li>• Includes a statement confirming that Heathrow will not tolerate modern slavery or human trafficking at any tier in our supply chain.</li><li>• Includes Heathrow’s commitment to working collaboratively with Heathrow Business Partners to increase awareness, detection and prevention of modern slavery and human trafficking, and to promote responsibility on this issue and ensure that we are transparent in our actions to tackle modern slavery.</li></ul> |
| Sustainable Procurement    | <ul style="list-style-type: none"><li>• Governs how we purchase the products and services we buy, the organisations we do business with, and the contracts that we manage.</li><li>• ‘Heathrow 2.0: Connecting People and Planet’, Heathrow’s refreshed sustainability plan is embedded into all procurement processes from sourcing strategies to tenders, evaluations, contract clauses and KPIs.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Whistleblowing             | <ul style="list-style-type: none"><li>• Aimed at our colleagues (permanent or temporary) and applies to all Heathrow Business Partners working at Heathrow Airport.</li><li>• This policy encourages individuals to report any wrongdoing which would include slavery or human trafficking.</li><li>• All whistleblowing reports are treated in the strictest confidence and are investigated fully with appropriate remedial actions taken, where necessary in accordance with Heathrow’s Internal Investigations Protocol.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |



# RISK IDENTIFICATION AND MITIGATION

Connecting People and Planet is our sustainability strategy. It includes an ongoing focus on tackling modern slavery and human trafficking as one of the foundations which ensure that Heathrow is a responsible business.

Heathrow recognises that modern slavery risk is not evenly distributed across our operations or supply chain. To ensure that our efforts are focused where they can have the greatest impact, we prioritise modern slavery risks based on a combination of factors, including the use of temporary or subcontracted labour, the depth and complexity of subcontracting arrangements, the vulnerability of workforces and the nature of the services being delivered.

This risk-based prioritisation informs where we focus enhanced due diligence, supplier engagement, audits and training activity.

Heathrow's 'Risk and Assurance Management Framework' is a Group-wide enterprise risk management system designed to oversee key risks faced by the organisation, including modern slavery. It guides how risks are identified, mitigated, reviewed and reported throughout Heathrow. The framework undergoes continuous evolution to enhance data quality, completeness of risk information, control measurements and overall reporting integrity.



## RISK IDENTIFICATION AND MITIGATION (CONTINUED)

## OPERATIONS

With over 84 million passengers in 2025, Heathrow is one of the busiest international airports in the world, serving as a major transit hub for travelers from diverse backgrounds.

This high volume of passengers and connections poses a risk from human traffickers seeking to exploit individuals and the potential for modern slavery to arise.



## RISK MANAGEMENT

Heathrow is committed to being a responsible gateway, striving to end trafficking of people and wildlife. To support this, Heathrow supports Heathrow Travel Care, an independent crisis social work team based at the airport. As a registered charity, its purpose is to evaluate, counsel, and aid anyone who may be in trouble at Heathrow Airport. This includes passengers, colleagues, and others present at the airport for various reasons. Their support extends to those with concerns about modern slavery and human trafficking.

Heathrow Travel Care also support the activities of 'Operation Limelight' – a Police-led multi-agency safeguarding operation focusing on flights in which passengers may be at increased risk of prominent elements of modern slavery including female genital mutilation (FGM), forced labour and travel for other involuntary reasons.

To raise awareness among passengers, during the year Heathrow continued to work with A21, a non-profit organisation focused on ending human trafficking, alongside Border Force and Safeguarding and Modern Slavery (SAMS) officers.

This included the 'Can You See Me?' initiative, which aims to help the public recognise indicators of human trafficking and understand how to report concerns.

The 'Can You See Me?' campaign is displayed across Heathrow, including on baggage trolleys, supported by learning resources and links to reporting mechanisms such as the UK Modern Slavery Helpline. During 2025, for World Day Against Trafficking in Persons, campaign imagery was featured across digital displays in Terminal 2, in partnership with Heathrow Border Force.

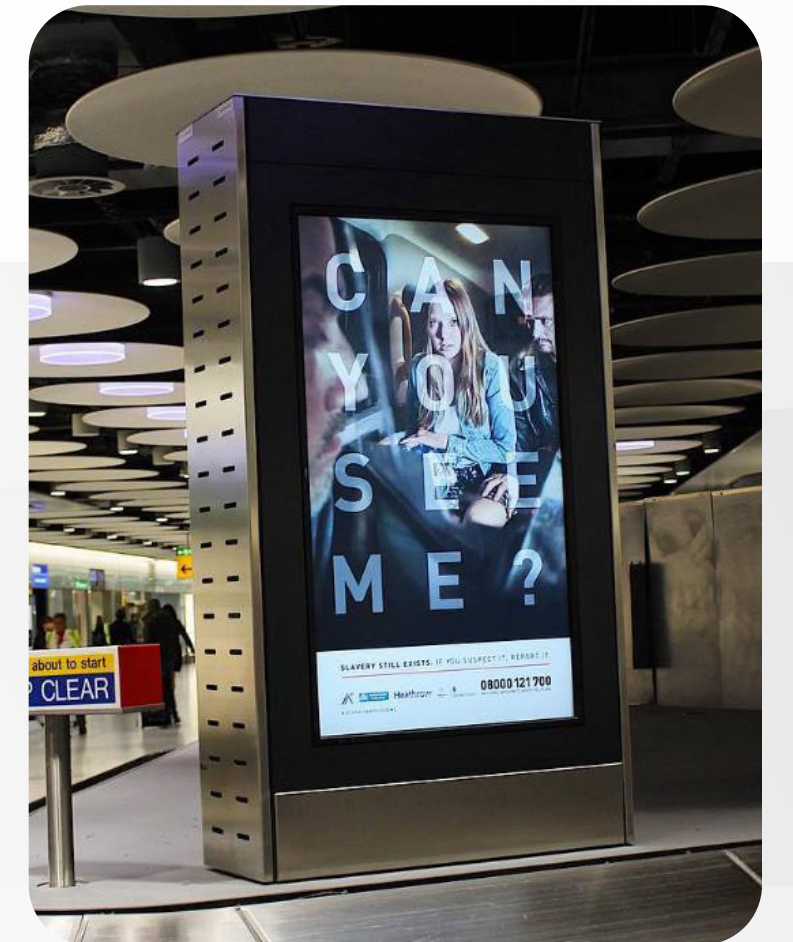
Heathrow's Multifaith Chaplaincy also plays an active role by assisting in taking the role of responsible adults when cases of modern slavery are suspected at the border.

Additionally, Heathrow's security officers continue to receive specialised training to identify instances of modern slavery within the Airport's operation and how to manage and escalate it accordingly. This now includes the recently implemented 'Border Security Awareness' course to reinforce a commitment to safeguarding passengers and strengthening operational resilience. More information is available on this in the Training and Capacity Building Section of this statement.

Heathrow continues to strengthen collaboration with key operation partners, including Border Force and Aviation Policing, to enhance visibility of safeguarding and modern slavery risks across the airport.

Initial data shared by partners for 2025 provides an insight into safeguarding and modern slavery-related activity, including referrals, the identification of potential victims, and a small number of cases progressing to the National Referral Mechanism, where individuals provide consent. This reinforces Heathrow's role as a point of identification and intervention, supported by multi-agency working across Team Heathrow.

Given this information is currently preliminary, not yet standardised across agencies, and reflects differing operational roles, including inbound and outbound activity it is not possible to provide specific numbers for the period. Heathrow will continue to work with partners to improve the consistency, quality and assurance of this data, with a view to strengthening future disclosures.



'Can You See Me?' campaign examples

## RISK IDENTIFICATION AND MITIGATION (CONTINUED)

### DUE DILIGENCE

Heathrow is subject to a raft of regulatory measures that enforce audits to ensure that the Airport and our stakeholders are effectively assessing and managing operational modern slavery risks.

The UK has a mandated responsibility to follow the ICAO Convention on International Civil Aviation Annex 9, which addresses the facilitation of modern slavery and human trafficking. Adaptation of this guidance occurs through the UK Government. Audits are carried out by ICAO every five years to assess Heathrow's compliance with the ICAO Convention, with Annex 9 audits carried out periodically – most recently in 2022.

The Immigration Act 1971 Section 25 mandates the methodologies and conduct required of Border Force to detect and manage human trafficking. Associated performance is audited by the Operational Assurance Department's Independent Chief Inspector of Borders and Immigration (ICIBI) to ensure compliance with legislative requirements.

Furthermore, Heathrow has an established Whistleblowing Policy and reporting mechanism called "See It, Say It, Report It" through which colleagues can escalate suspicions of modern slavery activity through to Heathrow's security team and appropriate corporate governance.



## RISK IDENTIFICATION AND MITIGATION (CONTINUED)

**WORKFORCE**

In 2025 Heathrow directly employed some 8,000 people (monthly average number), with over 80,000 people working across Team Heathrow – the wider network of external partner stakeholders that operate at the airport.

We recognise the risk of exploitation and forced labour and the necessity for rigorous controls to ensure robust management of modern slavery risk.

**RISK MANAGEMENT**

Heathrow abides by UK employment law, which aims to mitigate the risk of modern slavery in the workforce. The cornerstone is the Modern Slavery Act 2015, which mandates companies, including Heathrow, to publish annual statements disclosing efforts to combat slavery and human trafficking within operations and employment arrangements.

Additionally, Heathrow abides by employment laws such as the Employment Rights Act 1996, Employment Rights Act 2025 and the Gangmasters (Licensing) Act 2004, all of which play crucial roles in safeguarding workers' rights, preventing exploitation, and prosecuting offenders.

These laws and standards support authorities to investigate suspected cases of modern slavery, enforce labour standards, and provide support and protection to victims.

Moreover, regulatory bodies and government agencies work collaboratively to raise awareness, monitor compliance, and ensure the effective implementation of these laws, reinforcing the UK's commitment to eradicating modern slavery from its workforce; measures that Heathrow cooperates with and engages in.

**DUE DILIGENCE**

All Heathrow colleagues have continued access to a well-publicised grievance and mediation policy and procedure, ensuring timely and equitable resolution. This approach, agreed upon with our Trade Unions and regularly reviewed for legal compliance and best practice, is overseen by the Company's Policy Governance Group, comprising Trade Union and Management representatives. Accessible via our intranet, awareness of the policy is ingrained across all levels of the organisation.

Furthermore, Heathrow is subject to routine National Minimum Wage Audits, to ensure that minimum wage payments are maintained, including consideration of elective deductions. Automated monitoring is also maintained through the Airport's online employee management system, Theo.

Regarding internal process, Heathrow has stringent recruitment procedures in place to ensure that all colleagues are hired legally and ethically. Within the onboarding process, Heathrow systematically verify the identity of candidates, carry out extensive reference checks, and conduct background checks. Right to work is also assessed, helping minimise risk of exploitation of employees. This extends to Team Heathrow colleagues working at the airport, with ongoing compliance monitored through Heathrow's identity management system.

Heathrow is also committed to mitigating elements of modern slavery risk within colleague compensation packages. In 2017, Heathrow became a Living Wage employer and zero hour contracts were abolished within the airport's direct workforce. Since then, Heathrow has worked to ensure that all direct suppliers also pay the living wage, and we continue to support other Team Heathrow partners to adopt it. Heathrow is also subject to regular Working Time Audits, to ensure that colleagues working hours remain within regulation.

## RISK IDENTIFICATION AND MITIGATION (CONTINUED)

**SUPPLY AND VALUE CHAIN**

Heathrow operates through a vast ecosystem of more than 1,250 suppliers, from strategic infrastructure partners to local small businesses, alongside a wide range of independent tenants providing goods and services across the airport.

With this scale and complexity, Heathrow recognises the modern slavery risks that can arise within its supply and value chain and, in line with Connecting People and Planet, Heathrow takes robust action to identify risks and protect people from exploitation.

**RISK MANAGEMENT**

Heathrow uses third-party providers, such as SEDEX (Supplier Ethical Data Exchange), to act as independent auditing platforms which support our supply chain due diligence processes. Heathrow's supply chain due diligence evaluation includes the requirement to undertake an independent modern slavery risk assessment as part of our supplier onboarding process. Each of Heathrow's Tier 1 suppliers is required to undertake a modern slavery risk assessment annually, which is enforced within supplier contracts.

For any new suppliers since 2025 Heathrow's Qualifying Value Criteria supplier onboarding process has mandated a Modern Slavery Risk assessment as part of the requirements for becoming a supplier at Heathrow.

- **Risk Assessment**

Heathrow has identified a number of tools, resources and independent assessment providers including SEDEX and Ecovadis who are able to provide Independent risk assessments for supply chain.

These providers have been assessed and are able to deliver a level of assessment on Supplier processes and procedures which will allow Heathrow to identify areas of higher risk and exposure which can be appropriately reviewed and improvement measures put in place.

- **Continuous Improvement**

Heathrow looks to work collaboratively with our suppliers to address issues identified through assessments and audits. This includes implementing corrective actions, providing resources for improvement, and monitoring progress over time.

- **Supplier Engagement**

Heathrow engages with our suppliers to align with Heathrow's Responsible Business foundations. These foundations focus on the importance of ethical business practices, including those to combat modern slavery risk.

This involves communicating our expectations regarding labour standards, health and safety, paying the London Living Wage, an absence of zero-hour contracts and business ethics. Heathrow engages suppliers from the very outset of our Supplier engagement process. The Heathrow Qualifying Value Criteria require any organisation wishing to work with Heathrow to review their processes against our stated Responsible Business Foundations. Heathrow will review Suppliers on an annual basis for compliance with our Responsible Business Foundations with corrective actions for those found to be non-compliant.

- **Data Sharing**

Suppliers provide relevant data to Heathrow through the SEDEX and other independent platforms. Data required by Heathrow includes information on labour conditions, environmental impact, health and safety protocols, and compliance with all applicable regulations and standards.

- **Data Management**

Heathrow collects and manages supplier data within Heathrow's ERP system (Oracle Cloud). This includes storing audit reports, performance metrics and other relevant information related to supplier compliance. Heathrow leverages Power BI to enhance the visibility and analysis of supplier modern slavery data and brings this to light in regular reviews both internally with our leadership team and directly with the supply chain. This has strengthened our analytical capabilities and provided improved insights into suppliers' disclosure rates related to modern slavery.

- **Transparency and Reporting**

Heathrow promotes transparency by sharing high-level information about our supply chain practices with stakeholders, including suppliers, customers, investors, and the public. This information is included within Heathrow's annual Sustainability Report.

## RISK IDENTIFICATION AND MITIGATION (CONTINUED)

### DUE DILIGENCE

Heathrow has robust systems in place to identify, assess and manage modern slavery risks across its supply chain.

The Heathrow Procurement Support Team maintains a dashboard to monitor supplier compliance with modern slavery risk management. This includes oversight of compliance with the Prompt Payment Code, payment of the London Living Wage and the absence of zero hour contracts, as set out in Heathrow's Sustainable Procurement Policy.

Suppliers are subject to Heathrow's Supplier Assurance Process, which defines the steps followed to gather modern slavery related information and confirm compliance. Due diligence relating to supplier adherence to modern slavery standards is monitored on a regular basis.

Heathrow's dedicated Sustainable Procurement Management Team works closely with suppliers and internal stakeholders to assess risk, build capability and drive continuous improvement across a range of sustainable objectives including making Heathrow a great place to live and work. This approach also promotes responsible and sustainable management practices across Heathrow's sourcing activities and existing supply chain.

Heathrow has developed a Balanced Scorecard to assess strategic Tier 1 suppliers against a broad range of sustainability requirements. Modern slavery risk assessment and mitigation forms a core component of this evaluation, reinforcing expectations around ethical labour practices and responsible business conduct.

The Balanced Scorecard has been embedded as a flagship mechanism for driving supplier performance, as outlined in [Connecting People and Planet, Heathrow's sustainability strategy](#).

As part of Heathrow's strategic supplier management process, performance against sustainability objectives, including modern slavery risk assessment and mitigation, is reviewed regularly. Supply chain managers and senior leaders review performance at each Supplier Review Meeting and take action where required to protect people and prevent exploitation.



# TRAINING AND CAPACITY BUILDING

Heathrow recognises the importance of raising awareness of modern slavery risks and supporting colleagues to identify and respond to concerns appropriately, noting that these risks vary across different roles within the business. To address this, a range of training courses are mandated to ensure all colleagues have the right understanding, can recognise the signs, and know how to report potential instances of modern slavery.

All colleagues are required to complete 'Modern Slavery in the Supply Chain' training upon joining Heathrow and on an annual basis. This is to ensure a consistent baseline level of awareness across the organisation.

The 'Modern Slavery in the Supply Chain' course covers:

- What is modern slavery
- The risk of modern slavery in our supply chain
- Why it is important to prevent modern slavery in our supply chain
- How to prevent modern slavery and what to do if modern slavery is suspected

Training completion and feedback are monitored to assess effectiveness and to inform ongoing improvements to content, targeting and delivery.

All of our mandatory training courses are delivered via our online knowledge hub. Heathrow also extends the 'Modern Slavery in the Supply Chain' training package to non-Heathrow colleagues and stakeholders at the airport. This is facilitated through a separate Learning Management System that allows external 'Team Heathrow' partners to access our training and learning content.

**In 2025, 98% of non-operational and 97% of operational colleagues completed 'Modern Slavery in the Supply Chain' training.**

To strengthen its approach and align training with areas of heightened risk, Heathrow has implemented an additional course 'Border Security Awareness' to reinforce its commitment to safeguarding passengers and strengthening operational resilience.

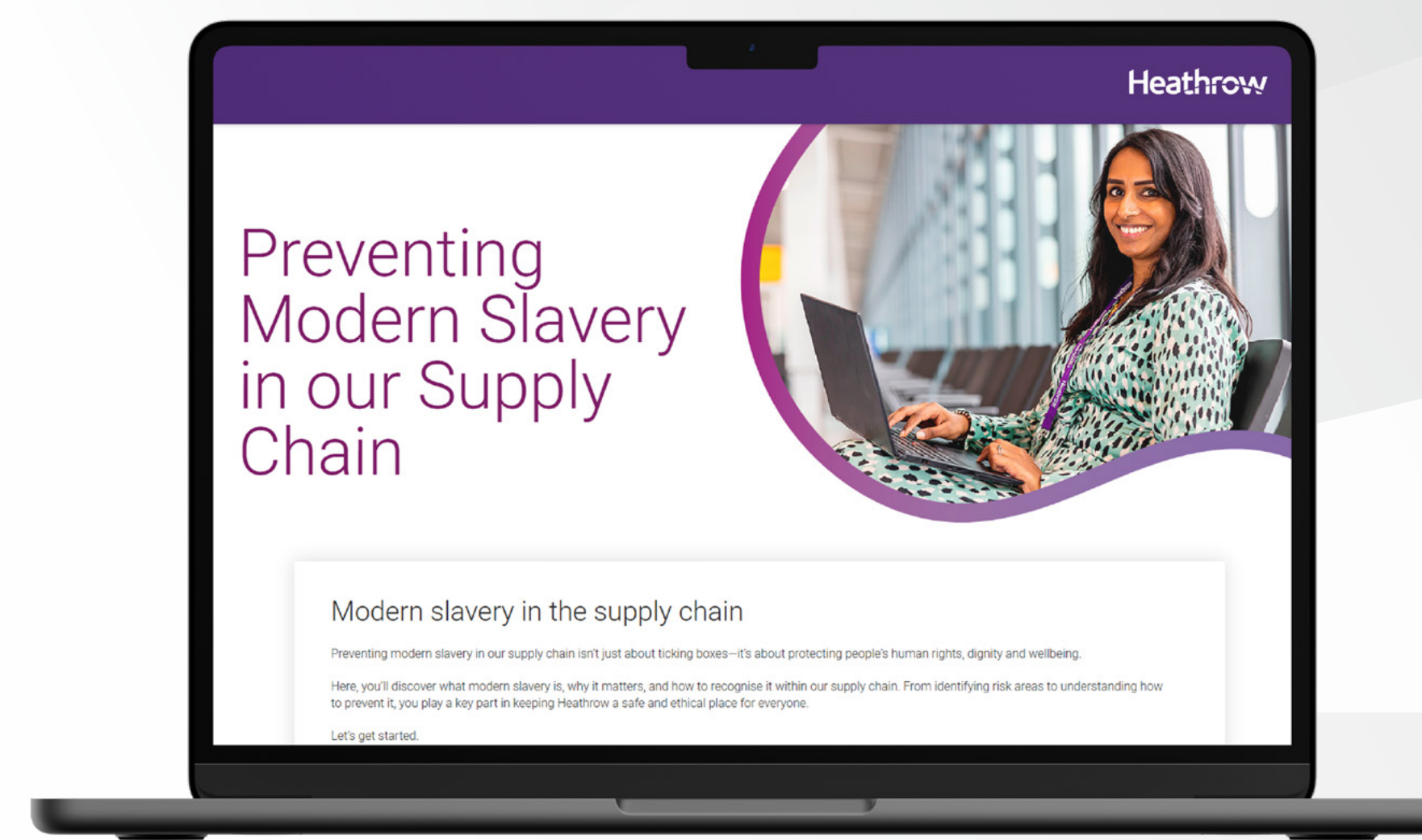
The 'Border Security Awareness' course covers:

- The importance of maintaining border security at Heathrow
- How to identify where and when border security breaches might happen
- How to escalate concerns and what happens when you do

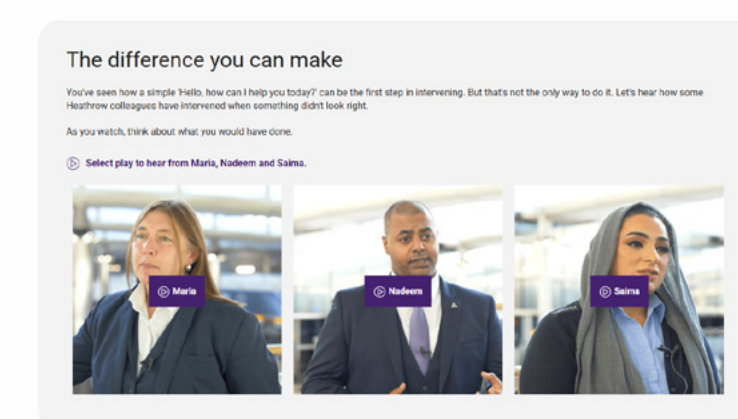
All colleagues are required to complete 'Border Security Awareness' training upon joining Heathrow and every two years.

**In 2024-2025, 99% of non-operational and 99% of operational colleagues completed 'Border Security Awareness' training.**

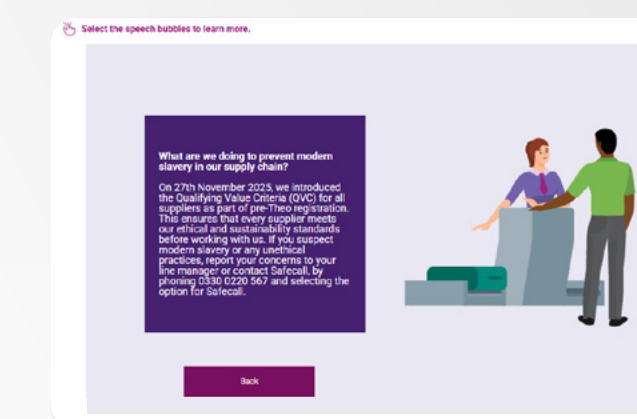
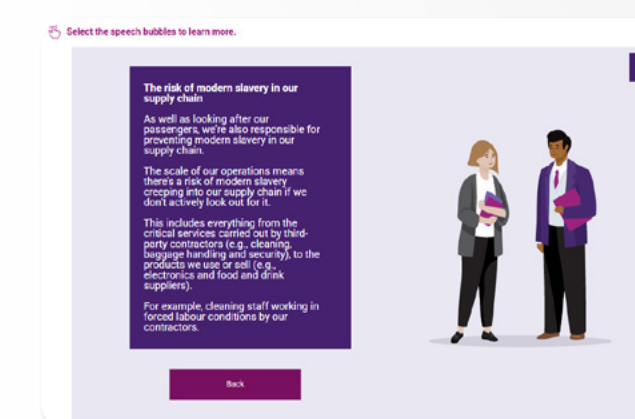
Furthermore, Heathrow provides frontline operational colleagues with specialised training, complementing the courses outlined above, focused on maintaining safe and secure borders whilst on the frontline.



'Modern Slavery in the Supply Chain'



'Border Security Awareness Training'



# PERFORMANCE INDICATORS

Heathrow uses a range of performance indicators to monitor modern slavery risk and the effectiveness of our controls. These indicators are reviewed alongside qualitative insights to help inform decision-making and prioritisation.

During 2025, Heathrow gathered data on several key metrics to inform our view of modern slavery risk:

## PROMPT PAYMENT



The average number of days Heathrow takes to pay invoices in full, to ensure suppliers are paid promptly for their work:

| 2023 | 2024 | 2025 |
|------|------|------|
| 22.8 | 25.2 | 23.4 |

## MODERN SLAVERY TRAINING



Percentage of **non-operational colleagues** that have completed Modern Slavery in the Supply Chain training:

98%



Percentage of **operational colleagues** that have completed Modern Slavery in the Supply Chain training:

97%



# SUMMARY REVIEW OF 2025 PRIORITIES

Addressing modern slavery and human trafficking requires a collaborative, risk-based approach across our operations and supply chain.

During 2025, Heathrow focused on strengthening governance, building organisational capability, enhancing risk visibility, and improving supplier engagement.

The priorities established for the year and the progress made against them are summarised opposite.



| Action                                                       | Description                                                                                                                                                                                                                                                                                                                                          | OUTCOME                                                                                                                                                                                                                                   |
|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Strengthen Governance and Stakeholder Alignment           | <ul style="list-style-type: none"><li>• Evolve the Modern Slavery Working Group into a strategic forum for ongoing risk review, mitigation, and oversight.</li><li>• Deepen engagement with Team Heathrow stakeholders to enhance alignment, decision-making, and accountability.</li></ul>                                                          | The Working Group provided a cross-functional forum in the year, including engagement with Border Force, supporting alignment across the business and contributing to People and Planet Committee governance.                             |
| 2. Build Organisational Capability Through Targeted Training | <ul style="list-style-type: none"><li>• Launch tailored training modules for supply chain and operational teams to improve risk awareness and response.</li><li>• Enhance modern slavery training, with potential inclusion of Modern Slavery Act compliance content, while also increasing availability of training across Team Heathrow.</li></ul> | Tailored training modules were introduced, with provision extended across Team Heathrow and high completion rates achieved.                                                                                                               |
| 3. Enhance Risk Visibility Across the Value Chain            | <ul style="list-style-type: none"><li>• Map the full Heathrow value chain to better understand exposure to modern slavery risks beyond Tier 1 suppliers.</li><li>• Introduce a structured process for auditing supplier risk assessments to improve insight and assurance.</li></ul>                                                                 | Risk-based approach further embedded to prioritise higher-risk areas, supported by enhanced supplier assurance processes and improved data visibility across Tier 1 suppliers. Further work developed to expand visibility beyond Tier 1. |
| 4. Improve Tools, Efficiency, and Supplier Support           | <ul style="list-style-type: none"><li>• Increase automation and improve integration with platforms beyond SEDEX to streamline audits and risk assessments.</li><li>• Explore support mechanisms for smaller suppliers to meet compliance requirements and elevate standards across our supply chain.</li></ul>                                       | Supplier due diligence strengthened through improved tools and integration, with initial steps taken to enhance engagement and support for smaller suppliers.                                                                             |

# PRIORITIES FOR 2026

Building on progress made in 2025, Heathrow will continue to strengthen its approach to managing modern slavery risk across its operations, workforce and supply chain.

The priorities for 2026 focus on formalising governance, enhancing risk visibility, strengthening performance measurement, and deepening engagement with suppliers and partners.

These priorities include:

01

## **Governance and stakeholder alignment**

Formalise the Working Group, increasing meeting frequency and strengthening its role in reviewing risk, mitigation and performance, with clearer reporting into the People and Planet Committee.

02

## **Organisational capability and training**

Maintain high completion rates and further develop role-based training for higher-risk functions, while expanding engagement across Team Heathrow.

03

## **Risk visibility across the value chain**

Extend the risk-based approach beyond Tier 1 suppliers and embed structured review of supplier risk assessments to strengthen assurance.

04

## **Tools, efficiency and supplier support**

Enhance data integration and use of third-party tools, while developing approaches to support smaller suppliers in meeting Heathrow's expectations.

05

## **Enhanced data reporting**

Work with partners to improve the consistency, quality and assurance of safeguarding and modern slavery data, supporting more robust future disclosures.



# FIND OUT MORE

Visit our website for more on our sustainability approach and reporting, including:

## APPROACH:

- Connecting People and Planet Sustainability Strategy
- Issue-specific strategies and plans
- Policies and statements

## REPORTING:

- Annual Report
- Sustainability Performance Data Book
- Reporting on specific issues

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TW6 2GW

[www.heathrow.com/sustainability](http://www.heathrow.com/sustainability)