



1. AGS Group Modern Slavery Act 2015 Statement

AGS Airports Holdings Limited, including its group of Airports, Aberdeen International Airport Limited, Glasgow Airport Limited and Southampton International Airport Limited, and its subsidiaries AGS Airports Limited, AGS Airports Investments Limited, AGS Airports Pension Trustees Limited, BAA Lynton Limited and Airport Holdings NDH1 Limited (herein referred to as the “AGS Group”) is publishing this statement in compliance with section 54(1) of the Modern Slavery Act 2015.

This Modern Slavery Statement has been approved by the Board of Directors of AGS Airports Limited, on behalf of the AGS Group, on 23rd January 2024. Information contained within this statement is correct at the date of publish. It details the steps taken by the AGS Group in order to comply with the provisions of the Modern Slavery Act 2015 to aid the prevention of modern slavery and human trafficking for the financial year ending 31 December 2024

2. Our Business

AGS Airports Holdings Limited, a consortium of Ferrovial S.A. and Macquarie Infrastructure and Real Assets (MIRA), owns Aberdeen International Airport Limited, Glasgow Airport Limited, Southampton International Airport Limited, AGS Airports Limited, AGS Airports Investments Limited, AGS Airports Pension Trustees Limited, BAA Lynton Limited and Airport Holdings NDH1 Limited.

Macquarie and Ferrovial have a long established and successful relationship, working together across several infrastructure projects and partnerships in airports.

3. Our Supply Chain

AGS’ supply chain covers many goods and/ or services across the airports and covers many industry sectors. These goods and services are grouped into the following categories:

- Capital
- Operational
- Professional services
- Digital
- IT Services and Telecoms
- Commercial (includes airlines, ground handlers and retailers)

Each department within the airports will, to a greater or lesser extent, have a supply chain in which it depends on, and the interdependencies of the various departments, as well as the commonality of goods and services required across the AGS Group, results in some suppliers that have dealings with more than one department and/or airport.



We have in the region of 1013 suppliers across the AGS Group. Many of these will have turnovers greater than £36 million which trigger the compliance requirements of the Modern Slavery Act 2015 and are required to produce a Modern Slavery Statement. AGS recognises that suppliers under this threshold can still be a risk, however they still go through our onboarding process and rigorous checks.

4. Our Policies

These are our Policies pertaining to Modern Slavery:

AGS Sustainable and Ethical Procurement Policy

Reflects our commitment to acting ethically and with integrity in all our business relationships, and to implement and enforce effective systems and controls to address the risk of modern slavery and human trafficking within our business or supply chain.

Code of Professional Conduct

To assist in achieving the highest standards of professional behaviour from AGS employees in dealings with colleagues, customers, suppliers, and other parties with whom AGS has a relationship.

Recruitment Policy

The business has a transparent, thorough recruitment process, which serves as a deterrent from the infiltration of trafficking groups with victims of modern slavery. AGS is committed to applying its equal opportunities policy, at all stages of recruitment and selection process.

Whistleblowing Policy

Primarily covers how to deal with serious concerns in the workplace, where the interests of others or that of the organisation is at risk. We offer three defined channels for whistleblowing and include modern slavery and potential victims of human trafficking in the list of potential disclosures.

In addition to this we are currently in the process of developing further policies looking at Human Right Issues which will be reported in our next Statement.

5. Due Diligence

Procurement

AGS' Group Procurement perform targeted diligence checks on the AGS supply chain on an annual basis and at the commencement of any new sourcing activity to ensure modern slavery compliance.

Prior to a tender process, all new suppliers are sent a Pre-Qualification Questionnaire ("PQQ") or an Invitation to Tender, which includes a section on



modern slavery. The Supplier may not progress beyond the tender stage if they are highlighted as high-risk at this stage.

When AGS engage with a new supplier out with a tender process, AGS invite the supplier to complete a new supplier form via our onboarding platform, which includes a modern slavery section to satisfy AGS requirements in respect to the Act.

AGS Procurement review the response to these questionnaires and determine whether there are any risks associated with the response, assess suitability of the supplier and any steps required to manage the modern slavery risk based on the response provided. AGS Procurement also record any modern slavery risk in the Procurement risk register until mitigation is in place.

Audit

If a supplier provides insufficient details to the questionnaire during the procurement process, or is highlighted as being a high-risk supplier, such as manufacturing companies or uniform providers, Procurement will carry out further investigations into the supplier. This will be completed by carrying out a desk-top audit, a telephone audit or by visiting the suppliers premises to carry out a full audit.

The audit documents delve deeper into a business's ethical behaviour, duty of care to employees, and the policies they have in place to satisfy Procurement that the risk of modern slavery is satisfactorily managed by the supplier. AGS also provide feedback and corrective actions to mitigate any potential risks.

If after an audit a supplier is deemed to be non-compliant with our standards or the Modern Slavery Act 2015, if within scope, and unwilling to improve, the supplier will be removed from the supply chain, and an alternative supplier will be sourced. AGS Airports monitor all supplier's modern slavery compliance on the Procurement risk register.

During 2023, AGS Procurement continually reviewed all suppliers in the supply chain for compliance with the Act. AGS conduct quarterly supplier performance reviews ensuring compliance with act where applicable.

Partnership with Slave-Free Alliance

In 2023, AGS Group continued its partnership with Slave-Free Alliance ("SFA"), who act as our 'critical friend' in addressing the risk of modern slavery. In 2021, SFA conducted a Gap Analysis to assess AGS's response to address the risk of modern slavery, identified key risks of modern slavery, highlighted areas of good practice and recommended potential areas for improvement.

AGS have delivered on the following recommendations from the SFA Gap Analysis:

- Concession and Management Agreements are now subject to an annual Modern Slavery Review



- Collaboration with Suppliers to map their sourcing locations of goods provided to AGS. An example of this would be the recent tenders issued for PPE and Uniform.
- Supplier PQQ has been updated to include intelligence driven questions for suppliers. This has now been included in our revised tender process and is allowing us greater visibility into supplier efforts.
- Human rights elements are included in the AGS Sustainability Strategy
- AGS Whistleblowing Policy has been amended to include potential victim of human trafficking/modern slavery in the list of disclosures

6. Risk

The SFA Gap Analysis identified the following four modern slavery risk areas for AGS:

- Concession and Management Agreements
- Construction and Labour Agencies
- Uniform Supply Chain
- Passengers in transit as potential victims of human trafficking and modern slavery

Significant progress has been made in relation to these areas to reduce the risks but efforts will continue in 2024 to deliver on the following recommendations from the SFA Gap Analysis:

- Construction and Labour Agencies
- Passengers in transit as potential victims of Human Trafficking and
- Modern Slavery

7. Training

Our Executive Team has a strong commitment to understand and manage the risk of modern slavery that cascades into the business and supports the progression of our work. To further strengthen that commitment AGS will provide training in 2024 to AGS employees on the following:

- Targeted and tailored training programme on Human Trafficking and Modern Slavery Training Awareness

We will continue to consider other awareness activities and implement them as appropriate during 2024.



8. Effectiveness in Addressing Modern Slavery


AGS have made significant progress to understand the risk of modern slavery faced by the business. We have made significant steps in developing our Modern Slavery and wider Human Rights Agenda which will continue throughout 2024 and beyond. We recognise that as we begin to take action to address these risks, the next steps will be to develop effective KPIs that measure our performance.

Looking ahead AGS will continue with the Modern Slavery Action Plan in 2024. We commit to delivering the following actions:

- Partner with SFA to review our audit plan and methodology to define relevant Modern Slavery indicators or human rights standards to assess against.
- Ensure the inclusion of Human Rights and Modern Slavery specific KPIs

The AGS Group is committed to persistently monitoring and tackling modern slavery and human trafficking. We continually review our approach and focus on continuous improvement to effectively delivery strategies that address the risk of modern slavery.

Signature


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Name

ANDREW CURRAN
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Title

CEO
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Date

24 JANUARY 2024
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