

# Modern Slavery & Human Trafficking Policy

## Introduction

Today, we live in a world where Modern Slavery and Human Trafficking still takes place. As one of Northern Ireland's key entry and exit gateways, it is vital that we at George Best Belfast City Airport are committed to tackling the issues surrounding slavery and human trafficking and play our part in helping to prevent it from occurring.

Modern Slavery can take many forms that exploit individuals for the purpose of commercial or personal gain, amounting to a violation of a person's human rights covered by the four key criminal areas under The Modern Slavery Act 2015. These are;

- Slavery
- Servitude
- Forced & Compulsory Labour
- Human Trafficking

## Purpose

George Best Belfast City Airport (GBBCA) is a value's led organisation and in respect of 'Our Core Values' have a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all our business operations and ensuring there are effective systems and controls in place to safeguard against any form of modern slavery and human trafficking occurring within our organisation.

We expect all our business partners or those who seek to have a business relationship with the airport to familiarise themselves with this policy, adhere to the responsibilities set out within and to behave in a manner that is consistent with its values.

## Responsibility

Modern Slavery and Human Trafficking requires everyone at, or associated with GBBCA, to play their part and remain vigilant to the risk in all aspects of the organisation.

The GBBCA Executive Team have the overall responsibility for this policy and to ensure compliance with the policy's legal and ethical obligations.

The HR & CR Manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring it's use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively and efficiently.

All line mangers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their role.

## Implementation

As Modern Slavery and Human Trafficking requires everyone at or associated with GBBCA to play their part in remaining vigilant, it is the responsibility of those to report any issues.

The reporting of any genuine concerns that may arise can be reported through GBBCA's

Whistleblowing Policy or by notifying either;

- Your Line Manager;
- HR & CR Manager;
- UK Border Force.

GBBCA would encourage openness regarding any genuine concerns and will support employees in good faith under the policy.

The breach of this policy by an employee of the company may lead to disciplinary action being taken in accordance with the Company disciplinary procedure. Serious breaches may be regarded as gross misconduct which may lead to dismissal.

### **Review**

This policy will be reviewed by the Executive Team in conjunction with the HR & CR Manager on an annual basis.

This policy does not give contractual rights to employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

**Should you wish to discuss this policy further, please do not hesitate to contact either your line manager or the Human Resources Department.**



**Approved by:**

**Date Agreed:** 1<sup>st</sup> June 2020

Brian Ambrose (Chief Executive Officer)

**Date for Next Review:** 1<sup>st</sup> June 2021