MELBOURNE AIRPORT

LAUNCESTON AIRPORT

AUSTRALIA
PACIFIC
AIRPORTS
CORPORATION

Modern Slavery Statement FY25

Contents

Acknowledgment of Country

Australia Pacific Airports Corporation acknowledges the First Nations of the lands on which our airports operate. APAC is committed to working closely with First Nations peoples in Melbourne and Launceston to deepen our understanding about how our airports can continue to operate and develop in a way that recognises and celebrates the airports' First Nations cultural heritage. APAC pays respect to their Elders past and present.

CEO's Message

Lorie Argus

I am pleased to present Australia Pacific Airports Corporation's (APAC) 2025 Modern Slavery Statement.

APAC is committed to upholding human rights and eradicating modern slavery in all its forms across our operations and supply chains. As a major airport operator, property developer, and now hotel owner, we recognise our responsibility to lead by example in promoting ethical business practices and safeguarding human dignity.

In preparing this statement, we undertook a comprehensive review of our supply chains, business activities, and risk areas. Our approach is guided by robust governance frameworks, regular risk assessments, and ongoing collaboration with partners, suppliers, and stakeholders.

We have strengthened our contractual requirements, enhanced staff training, and implemented targeted initiatives, including public awareness campaigns to address vulnerabilities and drive continuous improvement. Our policies and procedures are regularly reviewed to ensure they remain effective and aligned with evolving standards.

APAC's commitment extends beyond compliance. We actively engage with industry partners and, government agencies, to share best practices to mitigate the risk of exploitation.

Together, we are dedicated to fostering a transparent, ethical, and safe environment for all. As custodians of critical infrastructure with far-reaching social and economic impacts across Victoria and Tasmania, we recognise that our social licence to operate depends on the trust and confidence of our communities, partners, and stakeholders.

To all our suppliers and partners, thank you for supporting our ongoing efforts to eliminate modern slavery and to ensure our operations contribute positively to society and the broader economy.

Lorie Argus
Chief Executive Officer

Key Areas of Action FY25

Public Awareness Campaign

APAC partnered with anti-human trafficking organisation, A21, to launch a public awareness campaign called 'Can You See Me?' across our terminals. This initiative aimed to educate the public on how to recognise and report the signs of human trafficking.

Modern Slavery Clauses In Aeronautical Agreements And Leases

APAC has incorporated bespoke modern slavery clauses in the latest versions of its commercial agreements with airlines (which are currently being negotiated) and new leases across retail, food & beverage and property tenancies.

Modern Slavery Policy

APAC has adopted a standalone dedicated policy to outline its zero tolerance for modern slavery practices and internal processes for reporting, investigating and remediation of suspected cases of modern slavery.

Increased Training And Support

APAC has partnered with third party providers to facilitate the implementation of training on modern slavery with a particular focus on human trafficking.

Further Risk Identification

APAC undertook to a detailed risk assessment as the owner of a new airport precinct hotel, that open in July 2024.

Introduction

→ This Statement, made pursuant to section 14 of the Modern Slavery Act 2018 (Cth), sets out the risks of modern slavery in APAC's operations and supply chain, the actions taken to assess and mitigate those risks during the financial year, and the effectiveness of those mitigations. APAC is dedicated to developing and upholding a comprehensive response to modern slavery across the group. Consultation was conducted for each reporting entity included in this statement and its content applies to both APAM and APAL.

During the reporting period, we actively engaged and consulted with all entities we own or control in the development of this statement.

For the purposes of this Statement, 'APAC', 'the company' or 'we' refers to the Australia Pacific Airports Corporation Limited ABN 89 069 775 266 and each relevant entity which it controls (the 'APAC Group'), being:

Australia Pacific Airports (Melbourne) Pty Ltd ABN 62 076 999 114 ("APAM")

Australia Pacific Airports (Launceston) Pty Ltd ABN 79 081 578 903 ("APAL")

APAC (Holdings No. 2) Pty Ltd ABN 78 136 451 959 ("AH2")

APAC (Holdings) Pty Ltd ABN 60 081 578 887 ("AH")

This Statement was prepared by key personnel from across the APAC Group and has been approved by the APAC Board of Directors which has ultimate responsibility for all entities within the APAC Group.

This Statement covers the period 1 July 2024 to 30 June 2025

Approach to Human Rights

→ APAC strives to make a positive social, economic and environmental contribution to the communities in which we operate. We recognise that to meet this goal, APAC must respect and uphold the dignity and human rights of all our employees and also the airport community, including our airline customers, service delivery partners, contractors, tenants and the travelling public that utilise our airports.

Freedom from slavery is a fundamental human right. APAC respects all human rights and recognises that we have the ability to shape and influence actions of other entities in our supply chain by the way in which we conduct our business.

APAC acknowledges that modern slavery practices may be present within our operations and supply chains and accepts the responsibility outlined in the UN Guiding Principles on Business and Human Rights in taking action to prevent, mitigate and, where appropriate, remedy modern slavery in our operations and supply chains.
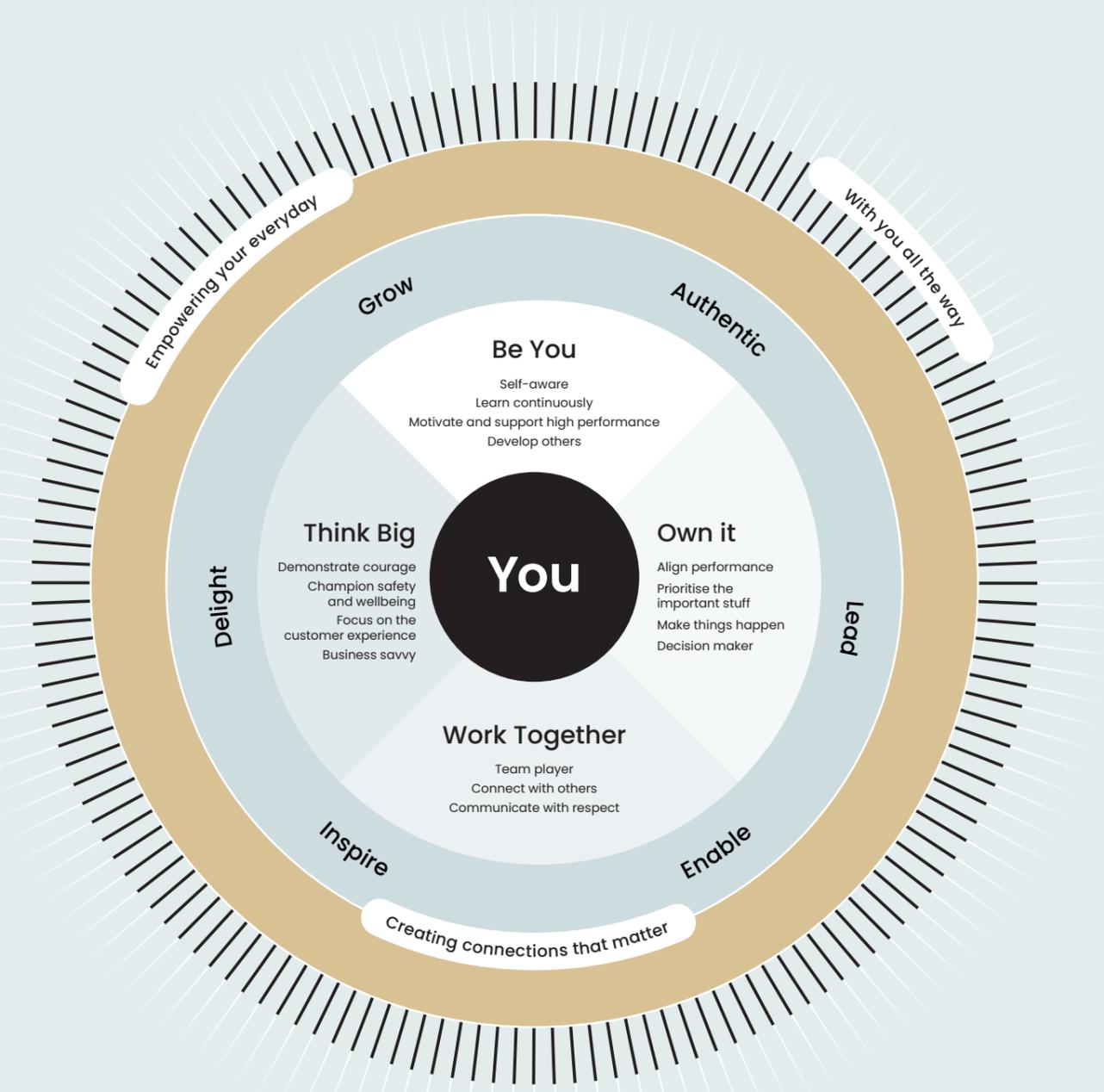
Modern slavery refers to various forms of severe exploitation and coercion that exist in contemporary society and all around the world. It is a term used to describe situations where individuals are exploited and controlled for the purpose of forced labour, servitude, human trafficking or other forms of exploitation. Modern slavery can take many forms, including but not limited to:

Forced Labour	People are coerced or deceived into working under exploitative conditions, often without pay or with very low wages. They may be subjected to physical or psychological abuse, restricted freedom of movement and harsh working conditions.
Human Trafficking	The recruitment, transportation, transfer or harbouring of individuals through threat, force or deception for the purpose of exploitation. This can include forced labour, sexual exploitation or forced marriage.
Debt Bondage	People are trapped in a cycle of debt and forced to work to repay it. Their labour is used as a means of repaying the debt, but the terms are exploitative, and they often cannot escape the situation.
Child Labour	The involvement of children in work that is harmful to their physical or mental development, deprives them of education, and exploits them in various industries, such as agriculture, mining, manufacturing and domestic work.
Forced Marriage	Individuals, often women and girls, are coerced or forced into marriages against their will. They may face physical, sexual and emotional abuse, and their freedom and autonomy are severely restricted.

Modern slavery is a violation of human rights and a serious criminal offence in most countries. It is a global issue that affects millions of people, with cases found in both developed and developing countries. Efforts to combat modern slavery involve legal frameworks, awareness campaigns, supply chain risk assessments and reporting, and international cooperation to identify and support victims and prosecute perpetrators.

APAC Values and Behaviour Framework

APAC's FY25 Facts and Figures

Grow — *Empowering your everyday*
Authentic — *With you all the way*

Be You
Self-aware
Learn continuously
Motivate and support high performance
Develop others

Think Big
Demonstrate courage
Champion safety and wellbeing
Focus on the customer experience
Business savvy

You

Own it
Align performance
Prioritise the important stuff
Make things happen
Decision maker

Work Together
Team player
Connect with others
Communicate with respect

Delight
Lead
Inspire — *Creating connections that matter*
Enable

TOTAL REVENUE **+15.8%** **$1,421.4m** ↑	EBITDA **+12.4%** **$945.4m** ↑
NET PROFIT AFTER TAX **+24.6%** **$388.5m** ↑	CAPITAL EXPENDITURE **+47.1%** **$1,179.2m** ↑
TOTAL PASSENGERS (EX TRANSITS) **+2.8%** **37.6m** ↑	INTERNATIONAL PASSENGERS **+8.3%** **12.0m** ↑
MELBOURNE AIRPORT DOMESTIC PASSENGERS **+0.4%** **24.2m** ↑	LAUNCESTON AIRPORT DOMESTIC PASSENGERS **+0.8%** **1.4m** ↑
NUMBER OF EMPLOYEES **396** MELBOURNE AIRPORT **48** LAUCESTON AIRPORT	MELBOURNE AIRPORT PRECINCT EMPLOYEES **26,000**

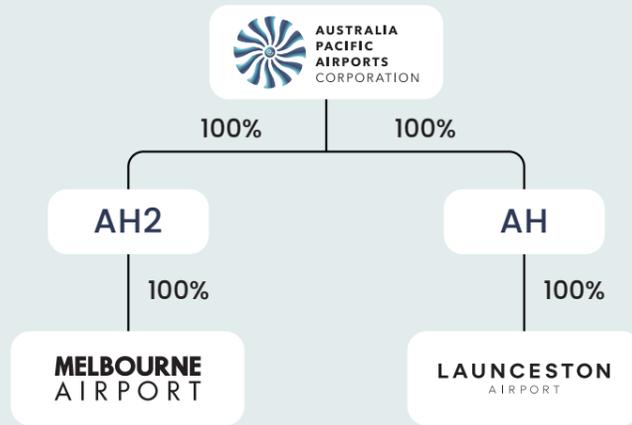*Figures indicate a comparison against FY24 metrics.

Our Structure, Operations and Supply Chain
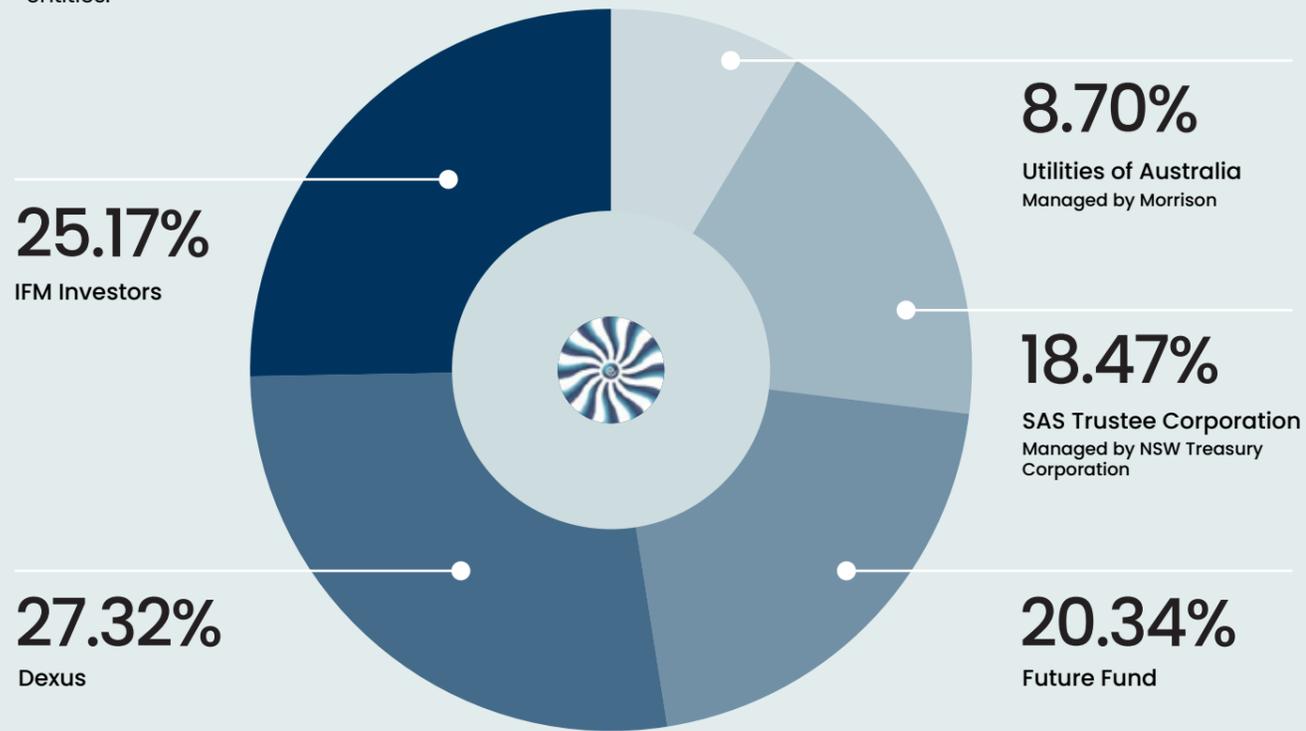
Ownership & Structure

APAC is a privately held corporation owned by institutional investors, predominantly superannuation/pension funds. There have been no changes to its organizational structure, either through acquisitions and/or restructures and its ownership has remained unchanged throughout the reporting period.

AH2 and AH are the immediate owners of each of APAM and APAL respectively and Launceston City Council has a 10% economic interest in APAL. APAC is the ultimate holding company of the corporate group.

AUSTRALIA PACIFIC AIRPORTS CORPORATION

100%   100%

AH2   **AH**

100%   100%

MELBOURNE AIRPORT   **LAUNCESTON AIRPORT**

Ownership Structure

The funds are owned, managed, or represented by the following five entities:

8.70%
Utilities of Australia
Managed by Morrison

18.47%
SAS Trustee Corporation
Managed by NSW Treasury Corporation

20.34%
Future Fund

27.32%
Dexus

25.17%
IFM Investors

Melbourne Airport

→ Melbourne Airport has been Victoria's gateway to the world since 1970, operating curfew-free, 24 hours per day, seven days a week. It is the second busiest airport in Australia and supports international and domestic travel including 39 airlines and 38 million passengers annually. It also serves as the major hub for Qantas, Virgin and Jetstar.

The airport is located 22 kilometres north-west of Melbourne's central business district and is well connected to the city's freeway and arterial road network. Supporting this access is a comprehensive ground transport network including Skybus Express services, taxi and rideshare hubs, regional charter buses, car rental services and car parking facilities.

The airport is close to major industrial areas and serves as a hub for freight and logistics, while providing employment to thousands of residents in nearby suburban growth corridors.

Melbourne Airport's retail portfolio includes 116 stores in total, covering approximately 17,000 sqm of leased space. This figure includes both retail and food & beverage outlets.

The Melbourne Airport site is approximately 2,740 hectares making it one of the largest airport landholdings globablly. Utilising this space (amongst other things) is the Melbourne Airport Business Park which is a thriving commercial precinct that accommodates freight and logistics operators such as DHL and Australia Post Gateway, alongside warehousing, corporate offices, and infrastructure services. It is a key employment hub, supporting thousands of jobs and contributing significantly to Victoria's economy. The precinct is designed for long-term growth, offering flexible spaces for businesses in IT, finance, construction, and property management.

As the largest Victorian employment hub outside of the Melbourne CBD, the airport precinct supports more than 26,000 jobs. Melbourne Airport makes a significant contribution to both the state and national economies as a key driver of tourism and trade-based industries that support jobs and generate growth.

International Routes

Melbourne - Victoria's gateway to the world

Istanbul

Beijing
Seoul
Nanjing Qingdao Tokyo
Chengdu Shanghai
Hangzhou
Doha Delhi Xiamen
Dubai Guangzhou Taipei
Abu Dhabi Haikou Hong Kong
Mumbai Hanoi
Colombo Bangkok Manila
Phuket Ho Chi Minh City
Kuala Lumpur
Singapore Bandar Seri Begawan
Jakarta
Denpasar

San Francisco
Los Angeles Dallas

Honolulu

Nadi

MELBOURNE
Auckland
Wellington
Queenstown Christchurch

Santiago

Domestic Routes Served

Launceston Airport

→ Located next to the Midland Highway and trunk routes servicing the north, north-west, north-east and south of Tasmania, Launceston Airport is well positioned to connect the state to the mainland and beyond.

The airport site occupies 180 hectares with a single north-west runway and full-length taxiway. Facilities include six domestic aircraft stands, three freight stands, and 15 general aviation stands. A separate terminal houses Sharp Airlines' maintenance facilities, national reservations centre and departure lounge.

The airport also provides a range of facilities and office accommodation to ancillary non-aviation businesses attracted to the benefits of operating in an environment that has excellent connectivity and logistics links. As the main aviation hub for Northern Tasmania, Launceston Airport is the second-busiest airport in the state.

A key economic driver, the airport contributes $81 million annually to the Northern Tasmania economy, with tourists arriving through the airport contributing more than a billion dollars to the state's economy. The airport has a workforce of more than 550 direct and indirect employees.

APAC Functions

→ Anchored by aviation operations, APAC's diverse business also includes ground transport operations, retail businesses, accommodation, energy generation and commercial property tenancies across the precinct. Each of these business streams is supported and served by a number of business functions.

Aviation

The Aviation business is responsible for all aviation activities. This includes attracting new airlines and routes to Melbourne and Launceston as well as working with airlines to maintain existing services and managing capacity planning. The Aviation team oversees the day-to-day operation of the airport terminals and airfield. This incorporates an Integrated Operations Centre responsible for allocating aircraft to parking bays and airlines to check-in zones within the terminals, and managing incidents. This team also includes airfield safety, airfield maintenance and airfield ground lighting teams that ensure that aircraft, vehicles and people can safely manoeuvre across the airfield.

In addition, the Aviation team also includes airport security and screening, business resilience and emergency response. The development and delivery of all aviation related infrastructure is also managed by this team.

Ground Transport

The Ground Transport team ensures travellers have access to transport options to and from the airport. The team oversees the airport's car park business - which includes an undercover valet parking service - as well as relationships with commercial operators such as SkyBus, rideshare and taxi services. Ground Transport also oversees road maintenance and pedestrian and vehicle safety, and leads the development and delivery of road and car parking infrastructure to keep up with the demand within the precinct.

## Planning, Environment and Infrastructure

The Planning, Environment and Infrastructure business unit is responsible for ensuring the airport runs smoothly and safely. This includes the utilities team that manages the water, waste water, electricity, gas and HVAC systems and the facilities maintenance team that maintains and cleans the terminal buildings. This team also includes the engineering services development and delivery team who are responsible for ensuring that the infrastructure is capable of supporting future expansion of the airport. This business also manages an embedded electricity network that provides electricity to more than 180 tenants across the airport precinct.

The planning and environment teams support the business to ensure the protection of airspace, building requirements and complying with our responsibilities under various legislative instruments.

Commercial Property and Retail

The Commercial Property and Retail business team manages the food & beverage and specialty outlets spread throughout the terminals, along with airline lounges and service stations. The Commercial Property team has responsibility for a large property portfolio, which includes the 650-hectare Melbourne Airport Business Park. Tenants include freight and logistics companies, cold storage providers, accommodation providers, sport and recreation operators and advanced manufacturing facilities. APAC has also opened the doors as owner of the dual-branded Melbourne Airport Novotel and ibis Styles hotel. The hotel is managed and operated under a Management Agreement with Accor.
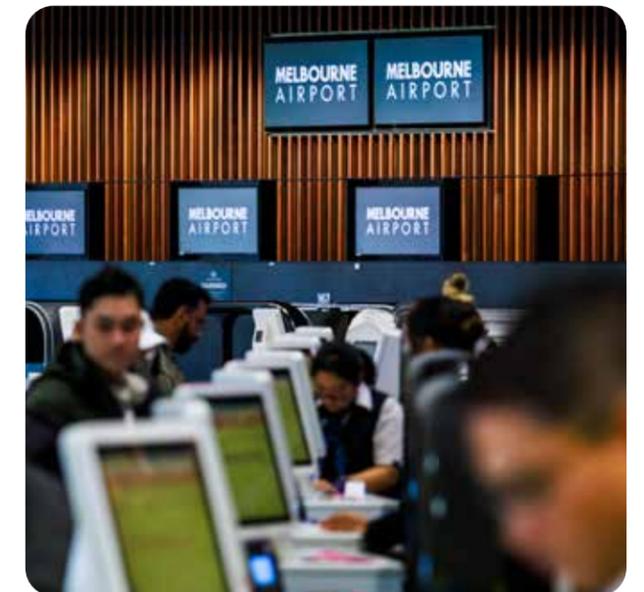
Finance, Technology and Risk

The Finance, Technology and Risk business unit contains the majority of the corporate functions including treasury, finance, procurement, risk, compliance, legal and technology. The technology team maintain not only APAC's IT infrastructure but also provide the IT infrastructure to support almost all critical systems at the airport such as the baggage handling system and the airline check in systems.

People & Culture

The People & Culture team supports the business's hiring and retention programs and safety management systems across the business. The team provides guidance regarding employment related issues and policies, and facilitates the negotiation of APAC's enterprise bargaining agreement. The safety team oversees the application of the APAC Safety Management System to ensure the safety of staff, contractors and all airport users.

Strategy and Community

The Strategy and Community team is responsible for setting and monitoring the business's achievement of its corporate strategy in addition to supporting the development and achievement of individual business unit strategies. The team includes public affairs, communication and community engagement functions.

Our Supply Chain

→ APAC has a global supply chain comprised of approximately 1500 suppliers.

These suppliers operate in a diverse range of industries, primarily service-based, and include technology support, consultancy, facilities management, construction and engineering, office supplies, cleaning, waste management, transport and marketing. Our suppliers deliver a range of goods and services to the airport. APAC delivers a significant capital works portfolio which draws on the Victorian and Tasmanian construction sectors and their associated supply chains.

Suppliers are generally engaged as independent contractors and may be contracted on a long or short-term basis depending on the nature of the services.

The majority of suppliers directly contracted by APAC are located in Australia. APAC is committed to operating ethically, fairly, in compliance with all relevant laws and in a socially responsible manner consistent with the expectations of our local communities. We also expect suppliers within our supply chain to act in the same way.

Our suppliers operate in many locations in the world. For further details regarding the locations and associated risk, please refer to pages 50 and 51 of the Statement.

Total APAC expenditure categories

OPEX (27%)	
Security	8.7%
Facilities	7.1%
Other	5.2%
Transport	1.4%
Technology	2.1%
Professional Services	1.6%
Construction	0.4%
Corporate Services	0.1%
Property	0.1%

CAPEX (73%)	
Security	3.1%
Facilities	5.1%
Other	7.3%
Transport	0.1%
Technology	2.1%
Professional Services	1.9%
Construction	53.6%
Corporate Services	0.0%
Property	0.1%

Internal Workforce

APAC's internal workforce is engaged on either a common law contract basis as employees (76%) or under Enterprise Agreement (24%). In addition, APAC utitlises a number of individual contractors to fulfil roles within our workforce. Those engaged under a common law contract are considered to be a low risk in terms of modern slavery due to individually negotiated contracts and the inherent protections provided under common law.

Our Enterprise Agreement is a fully negotiated agreement with significant consultation with the participants and their union representatives. The Enterprise Agreement is renegotiated every 3-4 years to ensure that it remains current in terms of remuneration, benefits and working conditions. The Enterprise Agreement must also comply with the Fair Work Act 2009 (Cth) and be certified by the Fair Work Commission. As a result, the modern slavery risk associated with the Enterprise Agreement is also assessed to below.

Direct Supply Chain

APAC has conducted a combination of supplier self-assessments and targeted risk assessments to gauge the risk of modern slavery within our direct supply chain.

The risk assessments have been conducted in accordance with the APAC Risk Management Policy and Framework, utilising the Global Slavery Index and the iPro Modern Slavery Risk Assessment, discussed on page 42 and 43.

APAC assesses the risk of modern slavery in our supply chain to be low. This is because the majority of suppliers that we directly contract with are located within Australia.

Additionally, APAC's major suppliers have policies in place to mitigate modern slavery risks under their own modern slavery obligations. APAC periodically reviews suppliers' policies and Modern Slavery Statements to ensure that they are meeting their obligations.

This is achieved through the inclusion of specific clauses in our suite of standard contracts and through the legal review of any non-standard contracts. APAC continues to develop its commercial arrangements to ensure suppliers have an explicit obligation to inform APAC of any activities that are proposed to be conducted offshore.

Indirect Supply Chain

APAC recognises that there may be instances in which we are indirectly exposed to modern slavery practices from within our supply chains. Specifically, the cleaning services, office supplies, IT services and construction industries are sectors that APAC considers more likely to be at risk of modern slavery practices occurring further down the supply chain. For example:

- risk that raw materials used in office teas, coffees and foods are not fair trade;

- risk of labour exploitation in the production of company uniforms (where used); and

- risk of unpaid or underpaid labour and excessive hours, including in relation to foreign workers and off-shoring of any component of services in connection with subcontracting in the construction, IT and/or cleaning sectors.

APAC also acknowledges that solar installations are considered an area of modern slavery risk in the construction sector. This is an ongoing focus for APAC.

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Risk and Governance Framework

Risk Management & Governance

Governance

APAC's Board and Executive Leadership Team have responsibility for driving and supporting risk management across the business. The APAC Audit, Risk and Finance Committee has responsibility for the oversight of risk management and regularly reviews APAC's corporate risk profile.

Risk management, including modern slavery risk management, is a key focus for APAC and is managed and monitored through the Safety, Risk and Compliance (SRC) governance structure and through its Modern Slavery Risk Committee.

The SRC governance structure is centered around the SRC Executive Committee that reports into the APAC Audit, Risk and

Finance Committee and ultimately the APAC Board. The SRC Executive Committee meets on a bimonthly basis and consists of the APAC Executive Leadership Team and other relevant team members. The SRC Executive Committee has several sub-committees.

The Modern Slavery Risk Committee is a sub-committee of the SRC Executive Committee and is focused on assessing and mitigating modern slavery risks.

The Modern Slavery Risk Committee consists of key personnel from across the APAC business including representatives from Risk, Procurement, Legal, Security, Asset Management, Technology, Aviation, People & Culture and Ground Transport. The group meets on a quarterly basis.

→   Rigorous risk management, governance and assurance are essential for safety, corporate stability and for sustaining long-term performance.

Risk management

APAC's Risk Management Policy and Framework provides a sound basis for good corporate governance, supports the business in achieving its objectives and fosters a positive risk culture.

APAC's philosophy to achieving effective risk management is underpinned by three key principles:

- Culture: APAC seeks to build a strong risk management and control culture thorough awareness, ownership and proactive management of key risks.

- Structure: APAC seeks to put in place an organisational structure that promotes good corporate governance, provides for appropriate segregation of duties, defines responsibilities and authorities, and promotes awareness, ownership, and accountability for risk management.

- Process: APAC seeks to implement robust processes and systems for effective identification, analysis, evaluation, treatment and monitoring of risks. This is done in a holistic and consistent manner and emphasises the integrated nature of risk management within the APAC business. APAC seeks to improve risk management and internal control policies and procedures on an ongoing basis and ensure that they remain sound and robust.

Organisational risks are managed collaboratively, and APAC's corporate risk profile is regularly reported to the Executive Leadership Team, the Audit, Risk and Finance Committee, and the Board.

Whilst business units are responsible for identifying, assessing and monitoring supplier-specific modern slavery risks and their treatment on an ongoing basis, the risk of modern slavery is identified and integrated in our enterprise risk management process and reviewed biannually.

The Legal, Risk and Compliance and Procurement functions of APAC are responsible for conducting due diligence activities of its supply chain, alongside relevant contract managers, having regard to the risk of modern slavery practices in pursuit of our business activities.

Procurement teams are responsible for monitoring compliance and organisational wide policies, such as the Procurement Policy which incorporates supplier risk assessments and standardised contractual terms in our contract suite.

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Risk of Modern Slavery Practices

Modern Slavery Risk Assessment

→ Whilst APAC's operations are confined to Australia which is considered to be a low-risk geographical location for human rights and modern slavery violations or risks, it is acknowledged that APAC operates across a number of high risk sectors, and, accordingly there is an inherent risk of modern slavery practices. APAC's diverse business operations face distinct modern slavery risks, largely due to their reliance on complex supply chains, potentially transient or vulnerable workforces, and high volumes of outsourced labour from other high risk sectors. The causes of these risks are discussed below.

Vulnerable Populations

Groups of people more likely to be exposed to harm or unable to advocate for themselves in exploitative situations. The level of worker vulnerability and risk of poor labour practices and exploitation are recognised to be higher in contexts where low skill labour is relied upon.

High Risk Business Models

Business models that rely on third parties for the provision of services – often labour hire. Outsourcing reduces company visibility over third-party recruitment practices and provision of worker entitlements.

High Risk Sectors Or Categories

Products and services regarded as having more significant inherent modern slavery risk – including industries that rely heavily on low-skilled labour and/or involve menial and repetitive work, often performed at night-time or in remote areas.

High Risk Geographies

Countries or regions which are known to have higher human rights (and modern slavery) violations or risks. High risk geographies include countries and regions vulnerable to bribery and corruption or without strong labour laws and governance.

Human Trafficking Risk

At APAC, we recognise that our airports are pivotal points of connection where people and goods move across borders everyday. With this role comes a significant responsibility to use our best efforts to ensure we do not contribute to practices that endanger human dignity.

APAC acknowledges that human trafficking is a modern slavery risk that is present within the airport environment. Airports are key environments where traffickers seek to move victims across borders. It is important to remember that traffickers have many ways of controlling a person and a person can be exploited without physical restraint or abuse and often occurs in plain sight.

The primary responsibility for mitigating the human trafficking risk at the airport sits with the Australian Border Force. APAC has regular coordination meetings with senior Australian Border Force personnel to support the implementation of local measure to mitigate human trafficking. An example of this is the provision of infrastructure and equipment to display digital messaging at key control points.

In addition, Melbourne Airport is supported by the strong presence of the Australian Federal Police (AFP) who are responsible for investigating and policing human trafficking at our borders and aim to protect people who are victims of modern slavery.

Modern Slavery Risk Overview

Both the Modern Slavery Act and the United Nations Guiding Principles on Business and Human Rights (UNGPs) require organisations to assess and address their involvement in modern slavery risks according to whether they:

- Cause the risk directly through their own activities;
- Contribute to the risk through their actions in combination with others; or
- Are directly linked to the risk through their business relationships, products, or services.

The following table provides a structured overview of modern slavery risks across APAC's key business areas. It highlights the types of airport activities potentially exposed to modern slavery risks, the nature of risk linkages (direct, contributory, or causal), and the typical risk drivers present in each area along with targeted mitigation strategies. This summary is intended to be a targeted risk assessment which informs due diligence priorities, and guides the development of effective mitigation strategies across the organisation's operations and supply chains, in line with legislative and international expectations.

Business Area & Activities	The types of potential modern slavery risk areas in accordance with the Modern Slavery Act and UNPGS:			Examples of Typical Risk Drivers for Business Areas & Activities	Examples of APAC's Targeted Mitigations
	Cause	Contribute	Directly Linked		
	APAC causes an impact when its own activities directly lead to a human rights violation.	APAC contributes to an impact when its actions, in combination with third parties, help enable or exacerbate a human rights violation.	APAC is directly linked to an impact through a business relationship (e.g., supplier, contractor), even if it did not cause or contribute to it.		
Airline & aeronautical operations – ground handling, ramp services, aircraft cleaning & catering, refuelling services			✅	Indirect exposure via airline supply chains (e.g. outsourced ground handling, cleaning and catering). Sub-contracting supply chains with little visibility, and typically low-skilled, low wage workforce. Food supply chains with agricultural risks. Human trafficking risks associated with air travel. 70% of all identified human trafficking occurs via air travel.	Modern slavery clauses are included in aeronautical commercial agreements with airlines (which are currently being negotiated). APAC has partnered with AFP and anti-trafficking group, A21, to ensure there is public awareness and staff training in relation to human trafficking activity.
Terminal services (i.e. security screening, emergency response, passenger assistance)			✅	Potential labour hire exploitation with typically low-skilled, low wage, casual workforce. Procurement of uniforms for staff. Procurement of screening equipment with large global supply chains and assembly in potentially high risk regions.	Security screening contractor workforce is covered predominately by Enterprise Bargaining Agreements. Melbourne Airport's contract for uniforms includes obligations on the supplier to ethically source products.
Airfield maintenance	✅ *		✅	Sourcing of products or raw materials from potentially high-risk countries.	*The manufacturer of rapid set cement and lighting equipment used by APAC for airfield maintenance is located in the US and Australia, countries considered to have a low risk of modern slavery practices. Airfield maintenance team is employed under an Enterprise Bargaining Agreement that outlines conditions of work and remuneration. Fatigue management plans also in place to ensure appropriate work conditions.

Business Area & Activities	The types of <u>potential</u> modern slavery risk areas in accordance with the Modern Slavery Act and UNPGS:			Examples of Typical Risk Drivers for Business Areas & Activities	Examples of APAC's Targeted Mitigations
	Cause	**Contribute**	**Directly Linked**		
	APAC causes an impact when its own activities directly lead to a human rights violation.	APAC contributes to an impact when its actions, in combination with third parties, help enable or exacerbate a human rights violation.	APAC is directly linked to an impact through a business relationship (e.g., supplier, contractor), even if it did not cause or contribute to it.		
IT help desk		✓	✓	The potential for off shoring and sub-contracting risks.	APAC's IT help desk contract contains stringent modern slavery clauses. A majority of the workforce is located in Melbourne.
Technology equipment procurement		✓	✓	Electronic products may require rare minerals for the equipment to function. These supply chains may involve the potential risk of forced risk of forced or child labor in certain mining region communities.	Major electronic equipment purchases procured under contracts which include express modern slavery clauses.
Hotel accommodation		✓		Hospitality sector is a high-risk sector for modern slavery, due to labour intensive, typically low-skill roles, high use of migrant and temporary visa holders and high turnover. In addition goods required (e.g. linens, uniforms, food, amenities, etc) are often sourced from complex global supply chains. Under APAC's Hotel Management Agreement (HMA), the hotel's staff are employed by the operator, not APAC. This arrangement has the potential to limit direct oversight of employment practices by the hotel operator. Hotels can be used as venues for human trafficking, including sexual exploitation and forced labour, and staff may be unaware of the signs.	The HMA requires the Operator to comply with all legal requirements regarding employment and adopt global standards and commitments with respect to human rights, fair employment and anti-modern slavery requirements. In addition, APAC management along with a hotel owner consultant engaged by APAC, closely oversee the operation of the hotel on a day-to-day basis.

Business Area & Activities	The types of <u>potential</u> modern slavery risk areas in accordance with the Modern Slavery Act and UNPGS:			Examples of Typical Risk Drivers for Business Areas & Activities	Examples of APAC's Targeted Mitigations
	Cause	**Contribute**	**Directly Linked**		
	APAC causes an impact when its own activities directly lead to a human rights violation.	APAC contributes to an impact when its actions, in combination with third parties, help enable or exacerbate a human rights violation.	APAC is directly linked to an impact through a business relationship (e.g., supplier, contractor), even if it did not cause or contribute to it.		
Retail and food & beverage tenancies		✓		The hospitality sector is a high-risk sector for modern slavery practices in its workforce. Indirect exposure for APAC through tenants' supply chains (including from high-risk countries).	APAC's food & beverage lease templates now include stringent modern slavery clauses.
Construction		✓		Construction is a high-risk sector which could potentially contribute to conditions for labour risks amongst sub-contracting chains. Building materials sourced from high-risk countries.	Current major construction contracts include clauses requiring the head contractor to ensure security of payment to sub-contractors. APAC ensures that whilst the tender process for capital projects is a competitive process, its price negotiation process acknowledges the need for maintaining an economically sustainable contract for both parties.
Facilities maintenance		✓		These sectors are typically high risk due to a combination of structural, economic, and oversight factors. They are services that require large workforces, which are often low-skill, low paid, casual or transient with significant new migrant employees.	APAC's facilities maintenance and cleaning contracts contain stringent modern slavery clauses.
Cleaning services		✓			
Renewable energy generation			✓	Solar panels, batteries and the rare minerals used in their production are often manufactured or mined in geographic locations where there are high modern slavery risks, particularly associated with forced labour.	APAC has acquired solar panels for its renewable energy generation projects from a supplier with a strong approach to identifying and mitigating modern slavery practices in its supply chain.
Inhouse facilities help desk			✓	The potential for off shoring and sub-contracting risks. Call centre operations can be outsourced to third party providers with vulnerable workforces at risk of exploitation.	Although outsourced to a provider, APAC's inhouse facilities help desk is based in Australia.

Our Global Supply Chain Risks

For FY25, APAC has assessed the risks of modern slavery practices in its supply chain using the iPRO Modern Slavery Assessment Tool (MSAT). The assessment has required APAC's major suppliers to complete a self-assessment questionnaire online.

After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of goods, industry sector, and workforce parameters that the supplier indicated in the MSAT.

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

Each supplier that completed the assessment was assigned one of the following risk categories:

- High-risk (high levels of inherent risk)
- High-risk (inadequate risk control)
- Medium-risk (partial risk control)
- Low-risk (adequate risk control)
- Low-risk (low levels of inherent risk)

We intend to carry this process forward as an annual assessment of our operations and supply chain.

The response rate for the supplier assessments was approximately 73%, an increase of 23% from FY24. This is considerably higher than the typical response rate of between 45-55% for first and second year users of the iPro MSAT. APAC will continue to review the list of participants and the approach to broaden the supplier reach and response rate for FY26.

The increase in the Inherent Risk Score is a reflection of APAC's new hotel business, which is a high risk sector, plus an increase in construction suppliers. The results for FY25 indicate that the majority of suppliers who completed the assessment, were in the low to medium risk categories.

Of 90 respondents, 4 respondents were considered to be in the high risk (inadequate controls) category due to a lack of internal training on modern slavery practices. During FY26, APAC will engage those suppliers and seek to understand how this could be improved.

Positively there has been an improvement in the risk controls of our supplier chain as the Unmitigated Risk Score has improved by 3.0.
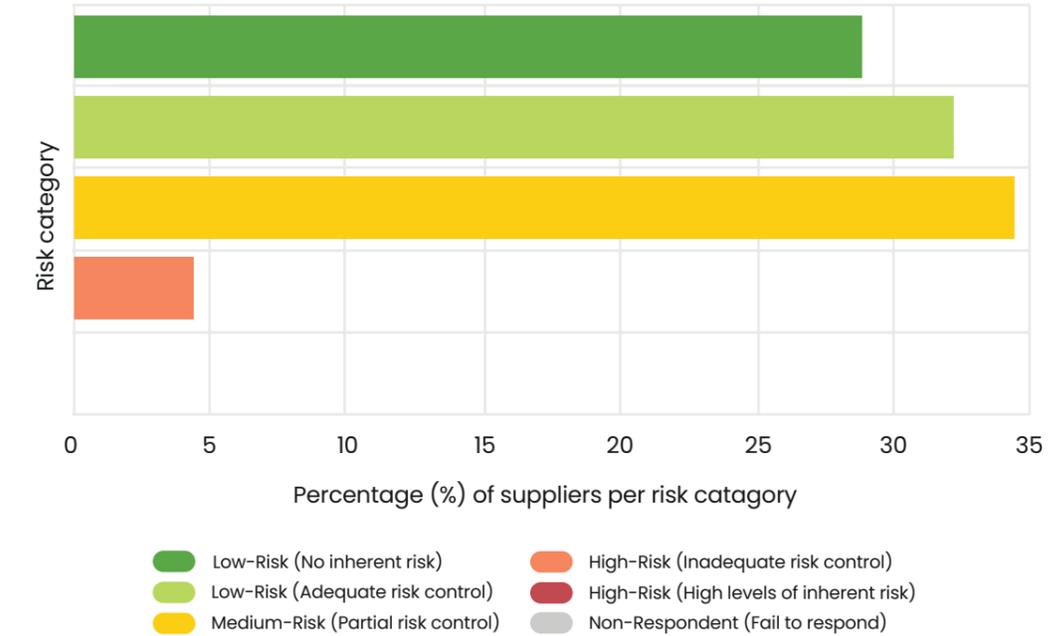
FY25 Aggregated Supply Chain Risk Scores

	FY24	FY25
Inherent Risk Score	24.22 /100	31.78 /100
Unmitigated Risk Score	25.89/100	22.89/100

FY25 Supplier Assessment Completions

	FY24	FY25
Surveys completed	64/128	90 / 124
Completion Rate	50%	72.6%

The aggregated spread of our supply chain's risk categorisation is as follows (based on responses received):

Our suppliers operate, produce and source across several different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur. These sectors include:

- Agriculture, Forestries and Fishing
- Construction
- Manufacturing
- Mining and Quarrying
- Cleaning
- Accommodation and Food Service Activities
- Retail
- Labour Hire
- Building Services Contractor
- Maintenance and Repair of Motor Vehicles
- Security Services
- Transportation and Storage
- Wholesale

These sectors are prone to exploitation due to factors such as low wages, informal work arrangements, poor regulation, and demand for cheap labour.

→ The below graphics show the high-risk sectors of operation, production and sourcing for our suppliers. The numbers in the following graphics describe how many suppliers are in the corresponding sectors.

High-Risk Sectors of Operation

We asked suppliers about their sectors of operation. Assessed suppliers provided the following insights:

Sector	Count
Accommodation and Food Service Activities	2
Agriculture, Forestries, and Fishing	1
Building services contractor	1
Cleaning	1
Construction	32
Labour hire	1
Maintenance and Repair of motor vehicles	2
Manufacturing	3
Mining and Quarrying	4
Retail	2
Security services	1
Transportation	3
Wholesale	3

Production of Goods and/or Services in High-Risk Sectors

Question 2 asked suppliers in which high-risk sector/s their organisation produced goods and/or services. Assessed suppliers provided the following insights.

| Sector	Count
Accommodation and Food Service Activities	2
Agriculture, Forestries, and Fishing	1
Building services contractor	3
Cleaning	2
Construction	25
Labour hire	1
Manufacturing	3
Mining and Quarrying	3
Personal services	1
Retail	4
Security services	2
Transportation and Storage	4
Wholesale	1

Suppliers Sourcing Goods and/Services in High-Risk Sectors

We asked suppliers which high-risk sector/s their organisation sourced goods and/or services. Assessed suppliers provided the following insights:

Sector	Count		Sector	Count
Accommodation and Food Service Activities	13		Agriculture, Forestries, and Fishing	2
Building services contractor	3		Cleaning	5
Construction	29		Labour hire	4
Maintenance and Repair of motor vehicles	10		Manufacturing	8
Mining and Quarrying	2		Personal Services	1
Retail	4		Security Services	3
Transportation and Storage	14			

In light of APAC's significant program of capital projects (including the third runway), a large number of APAC's major suppliers are involved in the construction sector.

The findings in the tables above confirm that construction activity and the modern slavery risks linked to that section should remain a key focus area for APAC moving forward.
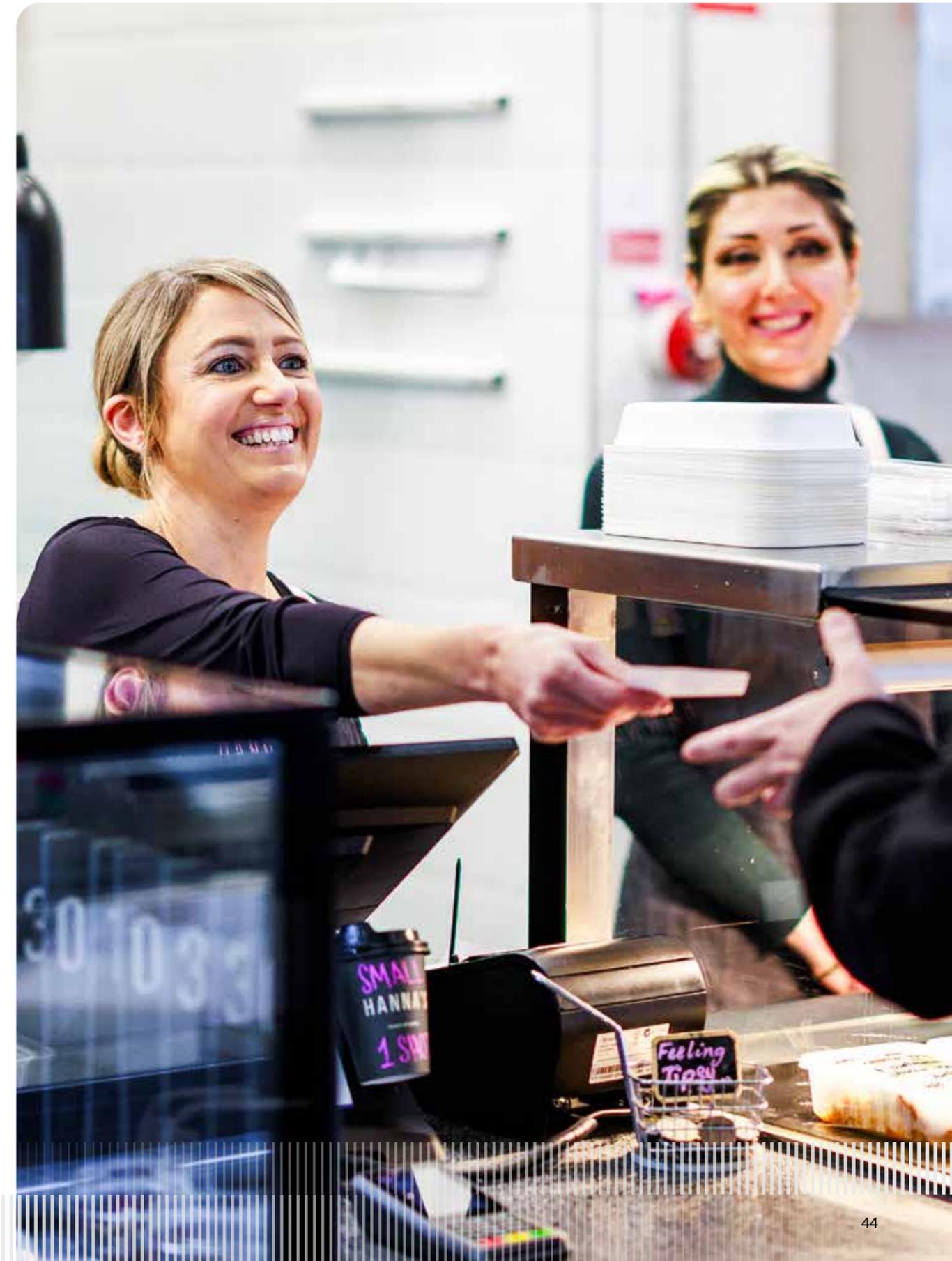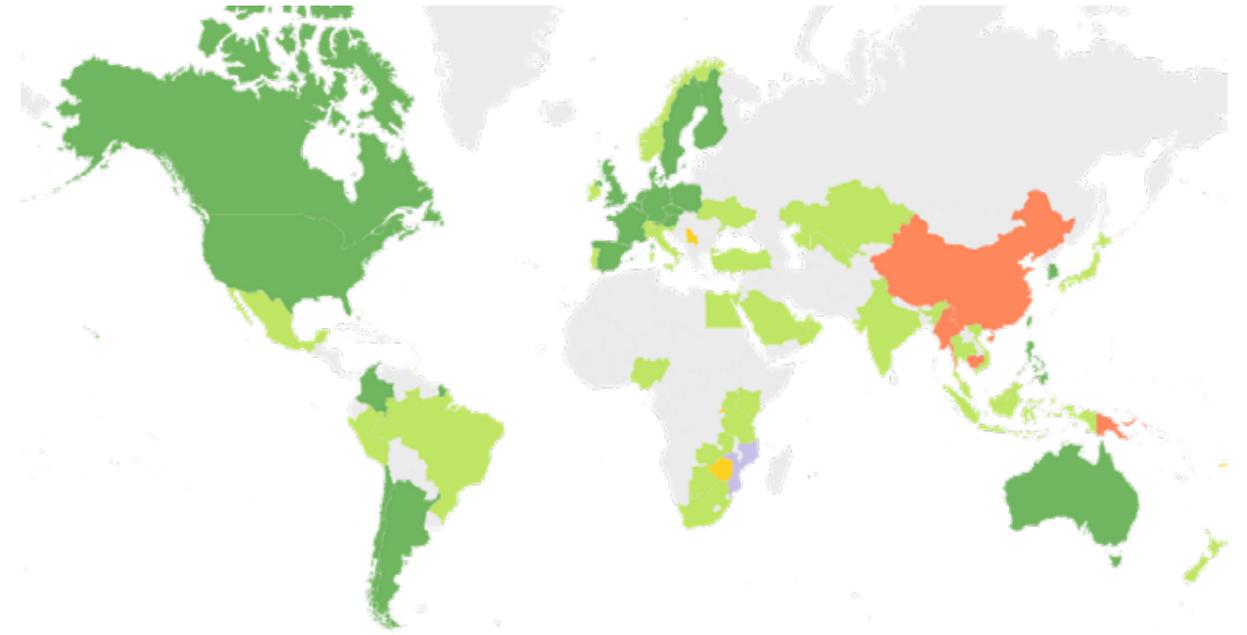
Supply Chain - Geographical Risk Profile

Some countries or regions where our suppliers operate, as well as some goods produced and sourced by our suppliers, can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour, human trafficking, child labour and debt bondage.

The geographical regions where our supply chain partners operate are shown in the map opposite. This map has been overlaid with the colour tier system of the Trafficking-in Persons Report prepared by the United Nations Office on Drugs and Crime (UNODC). The number shown next to each country or region above represents the number of suppliers with operations in that location.

- Argentina (1)
- Aruba (1)
- Australia (89)
- Austria (1)
- Bahamas (1)
- Barbados (1)
- Belgium (3)
- Botswana (1)
- Brazil (2)
- Brunei Darussalam (1)
- Cambodia (1)
- Canada (7)
- Chile (1)
- China (9)
- Colombia (3)
- Curaçao (1)
- Czech Republic (1)
- Denmark (4)
- Egypt (2)
- Fiji (2)
- Finland (2)
- France (8)
- Germany (7)
- Hong Kong (4)
- India (7)
- Indonesia (7)

- Ireland (3)
- Israel (1)
- Italy (6)
- Japan (7)
- Kazakhstan (1)
- Kenya (2)
- Luxembourg (2)
- Malaysia (5)
- Mauritius (1)
- Mexico (2)
- Mozambique (1)
- Myanmar (1)
- Netherlands (6)
- New Zealand (15)
- Nigeria (2)
- Norway (1)
- Oman (1)
- Papua New Guinea (3)
- Peru (1)
- Philippines (5)
- Poland (4)
- Portugal (1)
- Qatar (2)
- Republic of Korea (South Korea) (5)
- Rwanda (1)

- Saudi Arabia (5)
- Serbia (1)
- Singapore (11)
- Slovenia (1)
- South Africa (6)
- Spain (6)
- St. Maarten (1)
- Sweden (5)
- Switzerland (4)
- Taiwan (1)
- Tanzania, United Republic of (1)
- Thailand (3)
- Trinidad and Tobago (1)
- Turkey (3)
- Uganda (1)
- Ukraine (1)
- United Arab Emirates (9)
- United Kingdom of Great Britain and Northern Ireland (14)
- United States of America (14)
- Uzbekistan (1)
- Vietnam (2)
- Zambia (1)
- Zimbabwe (2)

Tier 1 – Countries and regions whose governments, at the date of this assessment, fully meet the Trafficking Victims Protection Act's (TVPA) minimum standards.

Tier SC – Due to civil conflict and humanitarian crisis, gaining information is difficult and a tier has not been assigned.

Tier 3 – Countries and regions whose governments do not, at the date of this assessment, fully meet the minimum standards and are not yet making significant efforts to do so.

Tier 2WL – Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, and as the (increasing) number of victims is significant without proportional action, and/or no evidence of increased efforts to combat trafficking has been provided.

Tier 2 – Countries and regions whose governments, at the date of this assessment, do not fully meet the TVPA's minimum standards, but are making significant efforts to meet those standards.

Uncategorised – At this date of assessment, insufficient information is available about these countries or regions and a tier has not been assigned.

5

Mitigation and Due Diligence

Mitigating Risk

→ APAC has a number of key controls that aim to limit, reduce or prevent modern slavery practices. These are outlined below.

APAC has continued to build on the work completed in 2024 to mitigate the risk of modern slavery occurring in our supply chain. Our progress against mitigations identified in FY24 and the new initiatives raised for FY26, are described in the following sections.

Current Mitigations

Supply Chain Modern Slavery Self Reporting Tools and Risk Assessments	Major APAC suppliers participate in a modern slavery maturity assessment. This tool serves to confirm effectiveness of downstream controls and measures with respect to modern slavery throughout the APAC supply chain. This process is completed on an annual basis and is utilised to inform ongoing supply chain risk assessments and associated controls within APAC's enterprise risk management framework. By engaging with iPro, an external software provider, APAC now has better oversight of the current risk exposures associated with our supply chain. The new platform will drive better governance and reporting on current supply chain modern slavery risks and exposures. This tool is currently being used to assess new suppliers and existing tier-1 suppliers but will be expanded to better capture modern slavery risk insights related to APAC's overall supply chain. This software will also enable future audits of current suppliers.
Procurement and Supply Chain Controls	APAC requires all major suppliers to provide transparency and seek approval for all activities that are to be subcontracted or proposed to be delivered or supported from offshore locations. APAC assesses the risks of these activities prior to contracting or permitting such arrangements. Specifically, for technology related activities, APAC's cyber security policy requires that supply chain activities are not conducted in high-risk geographies. APAC's procurement process has been updated to include mandatory and enhanced modern slavery due diligence and compliance checks for all suppliers participating in a tender. This includes a Modern Slavery Supplier Form, which must be completed by all prospective suppliers engaged through a competitive tender process. The current suite of request for tender documentation and internal tender evaluation templates includes a more detailed modern slavery review criteria.
Aviation Security Identification Card (ASIC)	The legal requirement to obtain and display an Aviation Security Iden-tification Card (ASIC) can help reduce modern slavery risks in Austra-lian airports by ensuring that workers meet strict security, identity and background verification standards. The ASIC application process involves rigorous checks. These screenings make it more challenging for traffickers or exploitative employers to place undocumented workers or individuals under duress in these roles, as fraudulent identities are more likely to be detected. The requirement to obtain an ASIC presents significant legal and logistical barriers to employing workers under exploitative conditions.
AFP Presence at Melbourne Airport	The AFP play a critical role at international airports including Melbourne Airport, focusing on maintaining safety, enforcing laws and preventing threats. The AFP work to detect and respond to serious crimes, including human trafficking, child exploitation, organised crime and modern slavery. By investigating suspected criminal activities within the airport environment, the AFP helps maintain lawful and safe travel.

Chaplain Service	The chaplaincy service at Melbourne Airport plays a significant role in combating human trafficking and modern slavery through support, awareness and advocacy. Its mission centres on providing care to vulnerable individuals, which includes travellers and airport workers who may be at risk of exploitation or in need of assistance. Chaplains are trained to recognise signs of human trafficking and modern slavery, such as fear, anxiety or restricted movement in travellers or workers. By maintaining a visible and approachable presence, they can observe and identify individuals who may require help, and can coordinate with airport security, the AFP and other agencies when they identify someone in immediate danger. They also work with anti-trafficking organisations, enabling effective support and safe intervention.
Increased Training and Support	APAC's modern slavery course provides all employees with the essential knowledge and tools to identify and address modern slavery within our operations and supply chain. It explores the various forms of modern slavery, the factors that elevate its risks, and the critical responsibilities APAC has in mitigating these risks. APAC has partnered with third party provider, A21, to facilitate the implementation of supply chain and internal training for a new mandated modern slavery training module. 96% of APAC staff have completed this training at the time of reporting.
Anti-Modern Slavery Contract Provisions	APAC's standard suite of contract clauses include anti-modern slavery provisions to ensure that suppliers have obligations in respect of forced labour, human trafficking and exploitation. In FY25 APAC's commercial contracts have been strenghtened to introduce these new clauses into agreements such as lease agreements for retail, food & beverage and property tenancies. This communicates to suppliers that APAC holds suppliers accountable, expects compliance with ethical labour practices and has zero tolerance for modern slavery.
Enterprise Bargaining Agreements	APAC successfully negotiated a new four-year Enterprise Bargaining Agreement, which received formal approval in November 2025. The vote received a 95.5% response rate – a clear demonstration of a highly-engaged workforce – with an overwhelming 94.3% of voters endorsing the agreement. At the time of writing this report, APAC has begun its next round of negotiations for a new four year Enterprise Bargaining Agreement.
Stepping Forward Program	APAC implemented an award winning customer service program to support airport staff (internal staff and key service providers) in engaging with passengers. This has mitigated modern slavery risk in two ways. Firstly, airport staff are more likely to interact with passengers who may be passing through the airport under duress and can alert AFP or Australian Border Force to act. Secondly, the program has created direct connections between our service providers staff at all levels with the APAC management team enabling issues to be raised directly.

Policies

→ APAC has a number of key corporate internal and external policies that it has implemented. All policies go through a regular review process and several policies require sign off by the APAC Board due to their significance. As part of its modern slavery risk mitigations for FY25, APAC has developed a corporate policy addressing its commitment to anti-slavery.

The following 8 policies are particularly important to mitigating modern slavery risks:

Modern Slavery Policy	The APAC Modern Slavery Policy outlines APAC's commitment to eradicating modern slavery including forced labor, human trafficking, and child labor from its operations and supply chains. The policy emphasizes a zero-tolerance approach to modern slavery practices. It details APAC's strategies for identifying, preventing, and mitigating modern slavery risks, including due diligence, supplier engagement, training, and reporting mechanisms. The document assigns clear responsibilities to the Board, General Counsel, Modern Slavery Committee, Manager Risk, Assurance and Compliance, and all employees. The policy also outlines grievance and investigation procedures, enforcement actions for breaches, and the requirement for mandatory training.
Code of Conduct	The APAC Code of Conduct underpins our ability to behave in a manner consistent with our shared values. It demonstrates how to practically apply those values in our day-to-day activities and as a result meet or exceed applicable legal requirements. The Code describes a common set of expectations for our conduct. However, it is not meant to provide specific guidance on every situation we may find ourselves. Rather, it is principle-based guidance that helps us think about "What is the right thing to do?" It also provides guidance on where to go for further support and information if needed. This policy is approved by the Board of Directors.
Supplier Code of Conduct	The Supplier Code of Conduct draws upon international standards and APAC's Code of Conduct to set out the foundation of minimum standards and expectations of behaviour that APAC expects of its suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, privacy and supplier diversity. APAC partners with vendors, contractors and consultants who commit to observing these principles not only in its dealings with APAC but throughout its own supply chain. This policy is approved by the CEO.

Speak Up Policy	This policy sets out how eligible parties can confidentially make disclosures of matters of concern involving misconduct of APAC or its officers or employees. This includes how this can be done on an anonymous basis via an independent avenue as well as the support that will be provided by APAC. This policy is approved by the Board of Directors.
Risk Management Policy and Framework	The Risk Management Policy and Framework details the risk management process followed by APAC and defines the likelihood and consequence ratings to be used when assessing enterprise risks. Consequence ratings are categorised across the following metrics: safety, reputation, regulatory, environment, business interruption and people. This policy and the associated framework are approved by the Board of Directors.
Compliance Management Policy and Framework	The Compliance Management Policy and Framework formalises the approach to compliance management across each of the APAC business units. This policy requires each business unit to develop specific plans on how they will comply with their obligations (legislative or otherwise). This policy and the associated framework are approved by the Board of Directors.
Procurement Policy	The Procurement Policy sets out the operational and behavioural standards that must be adhered to when procuring goods and services or engaging third party suppliers on behalf of APAC. This policy includes considerations for ethical sourcing (including modern slavery). This policy is approved by the CEO.
Cyber Security Policy	The Cyber Security Policy requires that supply chain activities are not to be conducted in high-risk geographies.

2025 Mitigations

→   APAC recognises that mitigating modern slavery risks within its operation and supply chain is an ongoing task and requires constant attention. The following key mitigations were implemented in FY25.

Public Awareness Campaign	In an Australian first, APAC in partnership with Sydney Airport and anti-human trafficking organisation, A21, launched a public awareness campaign to fight human trafficking. This initiative aimed to educate the public on how to recognise and report the signs of human trafficking, by utilizing the flight information displays across the international terminals and advertising assets of Melbourne Airport. QR codes were linked to videos and information about how to identify and stop these crimes. This activity was also extensively covered in the media to highlight the campaign to a broader audience. Combined, Sydney and Melbourne Airports cater for 68% of Australia's total international passenger traffic. While the "Can You See Me?" campaign ran over a one month period, as many as 7 million passengers passed through both the domestic and international terminals at the two airports.
Partnership with A21 to Provide Training	APAC Partnered with A21 and the AFP to provide education seminars regarding the risks of modern slavery, human trafficking in airport environments and how to identify a potential victim or perpetrator.
Modern Slavery Clauses in Aeronautical Agreements	APAC's draft 2025 Aeronautical Agreements include an express modern slavery clause. These agreement are yet to be finalised.
Modern Slavery Clauses in New Lease Agreements	In June 2024 modern slavery clauses were developed for use in all new APAC lease agreements across retail, food & beverage and property tenancies in addition to existing clauses in our professional services and technology agreements.
Identify and Assist Suppliers with Gaps in their Modern Slavery Training	APAC recommended training and policies to a number of identified suppliers to improve their unmitigated modern slavery risks. The focus was on a number of suppliers who from risk assessments were identified as having poor internal controls including a lack of internal training for their staff. This approach saw a number of suppliers subscribe to the iPro platform to improve their internal policies and training.

Conduct Further Risk Assessments Across APAC's New Accommodation Business and Renewable Energy Generation Assets	As owner of the Novotel/Ibis Melbourne Airport Hotel, an accommodation business operated by Accor on behalf of APAM, APAC undertook to assess the modern slavery risks associated with the business. This was in addition to identifying risks associated with the Greenpower generation and sales APAC provides to its tenants.
Supplier Self-Assessment Response Rate Improvement	APAC reviewed its practice of requesting tier-1 suppliers to complete iPro supply chain risk assessment. The intent of this review was to seek information beyond existing 'tier 1' suppliers and to also ensure a better response rate and therefore better insights into our supply chain modern slavery risks. This approach resulted in a 23% uplift in survey responses.
Modern Slavery Policy	APAC developed a Modern Slavery Policy to apply across APAC outlining APAC's zero tolerance for exploitation and modern slavery practices.
Monash University Review of APAC's Modern Slavery Statement	APAC engaged Monash University to provide a review of its FY24 Modern Slavery Statement against the ASX top 200 as part of its Modern Slavery Research Program. The feedback obtained from this review has formed the basis for updates in this Statement, particularly the focus on understanding how APAC causes, contributes or is directly linked to modern slavery practices in its business in accordance with the UN Guiding Principles on Human Rights.

Due Diligence

→ As part of its end to end procurement to delivery process for goods and services, APAC conducts a number of due diligence activities to identify potential modern slavery risks, concerns or practices.

Procurement Due Diligence

For high-value procurement activities, above $250,000, APAC applies a procurement process as it relates to modern slavery risks, amongst other things that includes:

Pre-Tender Planning:

• Identify suppliers and ensure they meet APAC's ethical and compliance standards.

• All procurement and contract managers are required to complete mandatory modern slavery training.

Request for Tender (RFT):

• Tender documentation templates include modern slavery review criteria.

• Require suppliers to complete the Modern Slavery Supplier Form as part of tender submission.

Evaluation & Selection:

• Seek clarification on tender responses.

• Apply weighted scoring for price, quality, and compliance including modern slavery criteria applied to by evaluation team.

• Moderation / consensus workshop to confirm short list.

Contracting:

• Insert clauses requiring ongoing compliance with APAC's Modern Slavery Policy and the Modern Slavery Act.

• Require attestation from contract managers confirming supplier compliance.

Post Contract Due Diligence:

• Annual assessment of supplier responses using the iPRO Modern Slavery Supplier Risk Self-Assessment Tool (MSAT) to determine risk category (High, Medium, Low).

• Ability to conduct post contract audits focussed on identifying gaps in labour standards or sub-contracting practices.

• Audits in accordance with APAC's Supplier Code of Conduct which explicitly outlines APAC's minimum expectations approach to human rights and fair labour practices.

• Supplier Performance Reviews / Service Level Reviews which might highlight risks associated with modern slavery practices.

Report, Respond, Remediate:

We encourage all APAC team members, our service providers, contractors, consultants and key partners to confidentially report any concerns relating to possible modern slavery practices and suspected violations of our policies.
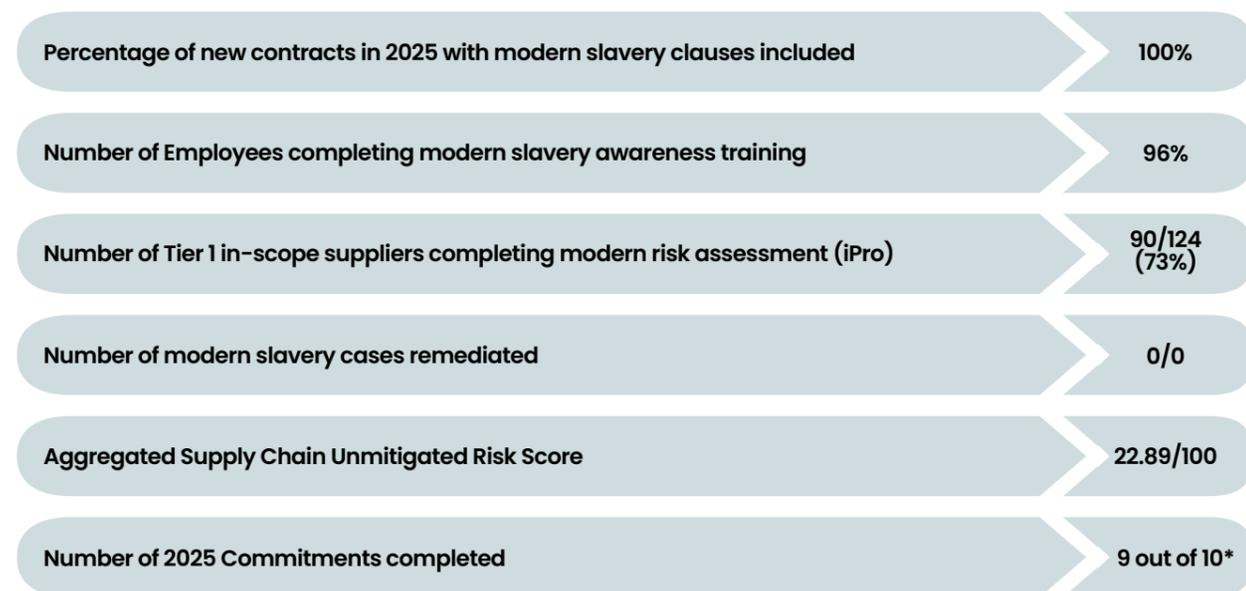
Acknowledging the sensitive nature of reporting of modern slavery practices, modern slavery complaints or concerns can be submitted to APAC via its Speak Up platform, ordinarily used for whistleblowers. This is to ensure that reports are protected free from retaliation, ensuring a safe environment for raising concerns. Reports can be made via a dedicated confidential reporting line or email address.

APAC is committed to appropriately investigating, addressing and responding to concerns and taking the appropriate corrective actions if required.

APAC has a set of documented Speak Up Procedures which ensure that allegations made under the Speak Up Policy are handled appropriately, promptly, and consistently to maintain the integrity of APAC. In general these steps are:

1. Upon receiving a disclosure, APAC's Speak Up Committee to assesses the information reported.

2. Depending on the severity of the issue, the Committee may initiate an independent external investigation.

3. If a report of modern slavery is substantiated a course of remediation may include victim-led steps to prevent recurrence, formal apologies or cessation of certain activities.

APAC regularly reviews its grievance mechanisms and remediation processes to ensure effectiveness and alignment with best practices and legislative requirements.

No substantiated modern slavery related issues were reported to APAC and no formal remediation plans were issued in 2025.

6

Evaluating our Performance

APAC measures the effectiveness of its modern slavery risk management using the performance indicators listed below.

Percentage of new contracts in 2025 with modern slavery clauses included	100%
Number of Employees completing modern slavery awareness training	96%
Number of Tier 1 in-scope suppliers completing modern risk assessment (iPro)	90/124 (73%)
Number of modern slavery cases remediated	0/0
Aggregated Supply Chain Unmitigated Risk Score	22.89/100
Number of 2025 Commitments completed	9 out of 10*

*APAC considered that creating a stand alone policy for the use of external recruiters was a very low risk to be addressing in the context of APAC's recruitment process.

FY26 Commitments:

The following key modern slavery mitigations are planned to be implemented in FY26:

Continued partnership with anti-human trafficking organisation, A21, and other Australian airports to launch another public awareness campaign on human trafficking in November 2025. This initiative aims to educate the public on how to recognise and report the signs of human trafficking.

Partner with an external third party to provide education seminars regarding the risks of modern slavery. The seminars will be provided to APAC's supply chain partners regarding the risks of modern slavery in our construction and property development space.

Provide additional due diligence guidelines to contract managers for early identification of modern slavery practices.

Include the Melbourne Airport's Chaplaincy service in the Modern Slavery Committee for enhanced insights, identification and follow-up interactions in our terminals with possible modern slavery cases.

Inclusion of a Modern Slavery Flyer to be included in ASIC card information packs and/or induction modules to enhance knowledge across the APAC business and supply chain.

Utilise APAC's incident reporting system to identify possible modern slavery risks and practices.

Procurement software upgrade to track all modern slavery clauses in contracts and identify those entities for due diligence audits.

Target high risk suppliers identified from iPro risk assessment surveys to identify areas of non-compliance with APAC's policies and assist to remedy identified issues (i.e. suggest additional training requirements).

Update modern slavery mandatory internal training module.

Increase the number of existing incumbent suppliers requested to complete iPro supply chain risk assessment to at least 30% of our entire supply chain. APAC currently requests assessments from the group of suppliers representing its top 80% of total spend across the business.

Compliance with Mandatory Reporting Criteria

Mandatory Criteria Reference in this Statement:

Criteria		Page reference
1	Identify the reporting entity	6
2	Describe the reporting entity's structure, operations and supply chains	13-31
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	34-53
4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	54-64
5	Describe how the reporting entity assesses the effectiveness of these actions	68-69
6	Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	7
7	Provide any other relevant information	N/A

MELBOURNE AIRPORT

LAUNCESTON AIRPORT

AUSTRALIA
PACIFIC
AIRPORTS
CORPORATION