

Modern Slavery Statement 2025





This statement, made pursuant to section 13 of the Modern Slavery Act 2018 (Cth), sets out the risk of modern slavery in BAC's operation and supply chain, the actions taken to assess and mitigate those risks during the financial year, and the effectiveness of those mitigations.

The Statement covers the financial year ending 30 June 2025 (financial year 2025). The Statement builds on our financial year 2024 Statement by focusing on Human Trafficking Awareness Training, supply chain mapping, managing emerging risks in our supply chain and engaging with external agencies to raise awareness of the risk of human trafficking within our operations.

This statement was prepared by key personnel from across BAC and has been approved by the BAC Board of Directors which has ultimate Responsibility.

For the purposes of this statement, 'BAC' refers to the Brisbane Airport Corporation Pty Limited ABN 54 076 870 650.

The Statement was approved by the BAC Board on 28 November 2025.

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Acknowledgement of Country

Brisbane Airport Corporation acknowledge the traditional owners of the Meanjin/Brisbane region and recognise their continuing connection to lands and waters.

We pay our respect to all Aboriginal and Torres Strait Islander peoples of the places Brisbane Airport connects.



CEO Message

At Brisbane Airport Corporation Pty Limited (BAC), we are deeply committed to upholding human rights and ensuring that our business operations and supply chain are free from modern slavery. This commitment is central to our values as the gateway to Queensland and a proud community partner.

The 2025 reporting year marks another important step forward in strengthening our awareness, governance, and action in this space. Over 400 BAC team members across all business units participated in targeted modern slavery awareness training, helping to build a shared understanding of how we can all play a role in identifying and preventing modern slavery risks.

This heightened awareness has led to two potential areas of risk being identified and effectively mitigated through proactive engagement with our suppliers and strengthened due diligence processes. These outcomes demonstrate that education, vigilance, and collaboration make a real difference — not only in compliance but in the way we conduct business responsibly and ethically.

As we continue to grow and deliver on Brisbane Airport's ambitious capital program, we remain steadfast in ensuring that our progress does not come at the expense of human rights. Through ongoing training, partnerships with our suppliers, and continuous improvement in our governance frameworks, we are building a more transparent and responsible supply chain for the future.

Together, we are making meaningful progress toward a business and community that stands firmly against modern slavery in all its forms.

A handwritten signature in black ink, appearing to read 'Gert-Jan de Graaff'. The signature is fluid and cursive, with a horizontal line underlining the name.

Gert-Jan de Graaff
Chief Executive Officer
Brisbane Airport Corporation

Key achievements from strategic plan in 2025



Financial year 2025 Modern Slavery Statement submission



Completed 35 supplier assessments as part of our ongoing due diligence using our third party audit tool Freedom (FRDM)



Regular review of industry updates through our supply chain support portal Freedom (FRDM)



Annual FARM Committee and Board update



All BAC staff undertook Modern Slavery Awareness Training



Expanded the BAC Modern Slavery Working Group to include members from all key business units



2026 Key Areas for Action

Key areas of action in financial year 2025 and goals for financial year 2026



FY25

Issued 35 Supplier Assessment Questionnaires to highest risk suppliers.

Modern Slavery Awareness Training provided and completed by all BAC staff (445 total)

Monitored changes and proposed changes to the Modern Slavery Act and review of BAC's Modern Slavery Strategy



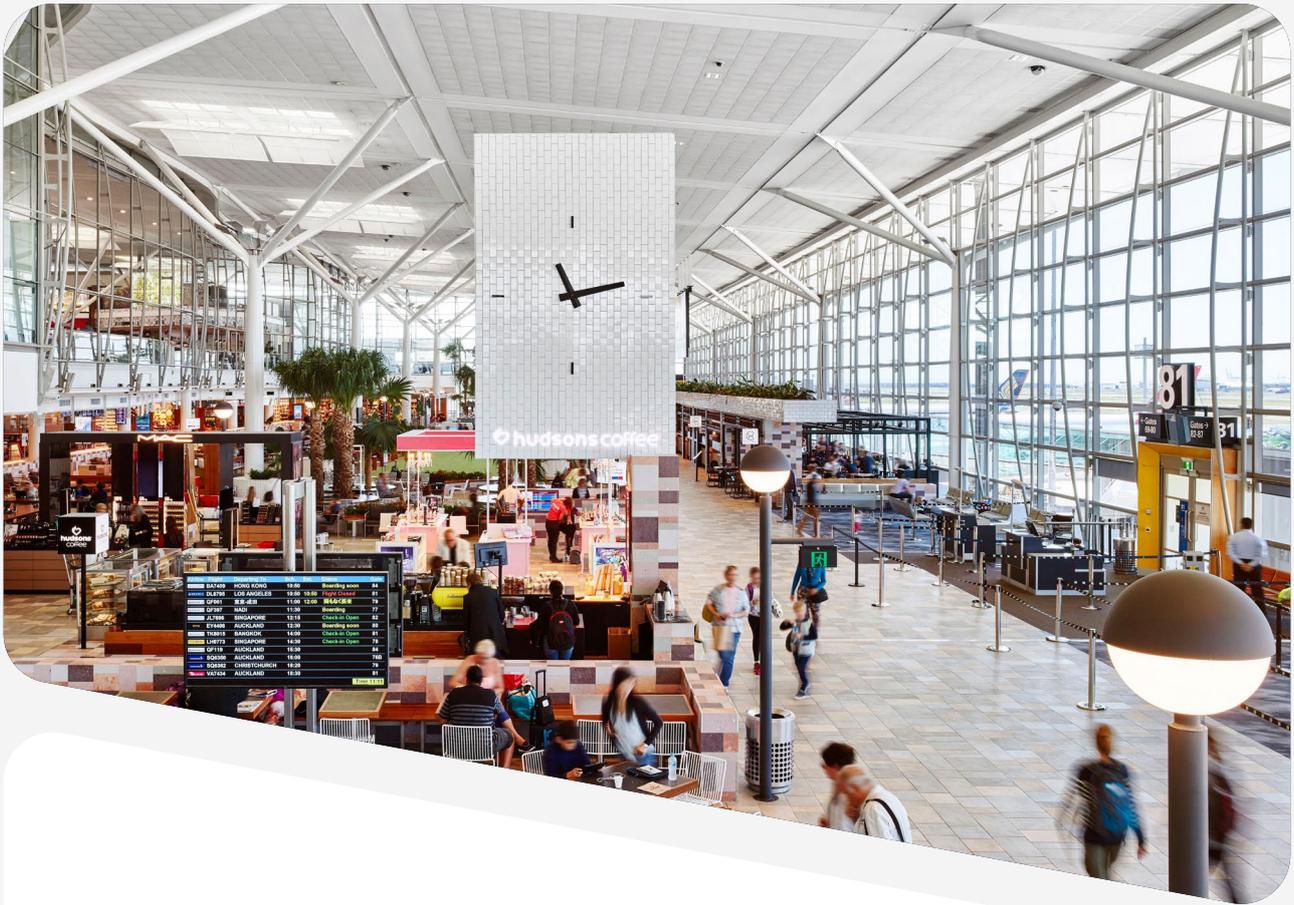
FY26

Implement a new enhanced audit tool for suppliers and contractors

All new staff to complete Modern Slavery Awareness Training as part of their induction.

Develop a new supplier due diligence portal and structured supplier segmentation awareness.

Governance - Implement effective risk management frameworks and internal audit processes.



Introduction

Brisbane Airport Corporation is committed to conducting business responsibly and with integrity, ensuring that human rights are respected across all areas of our operations and supply chain. Our approach to identifying and addressing modern slavery risks continues to evolve as we strengthen our governance frameworks and deepen our partnerships with suppliers and stakeholders.

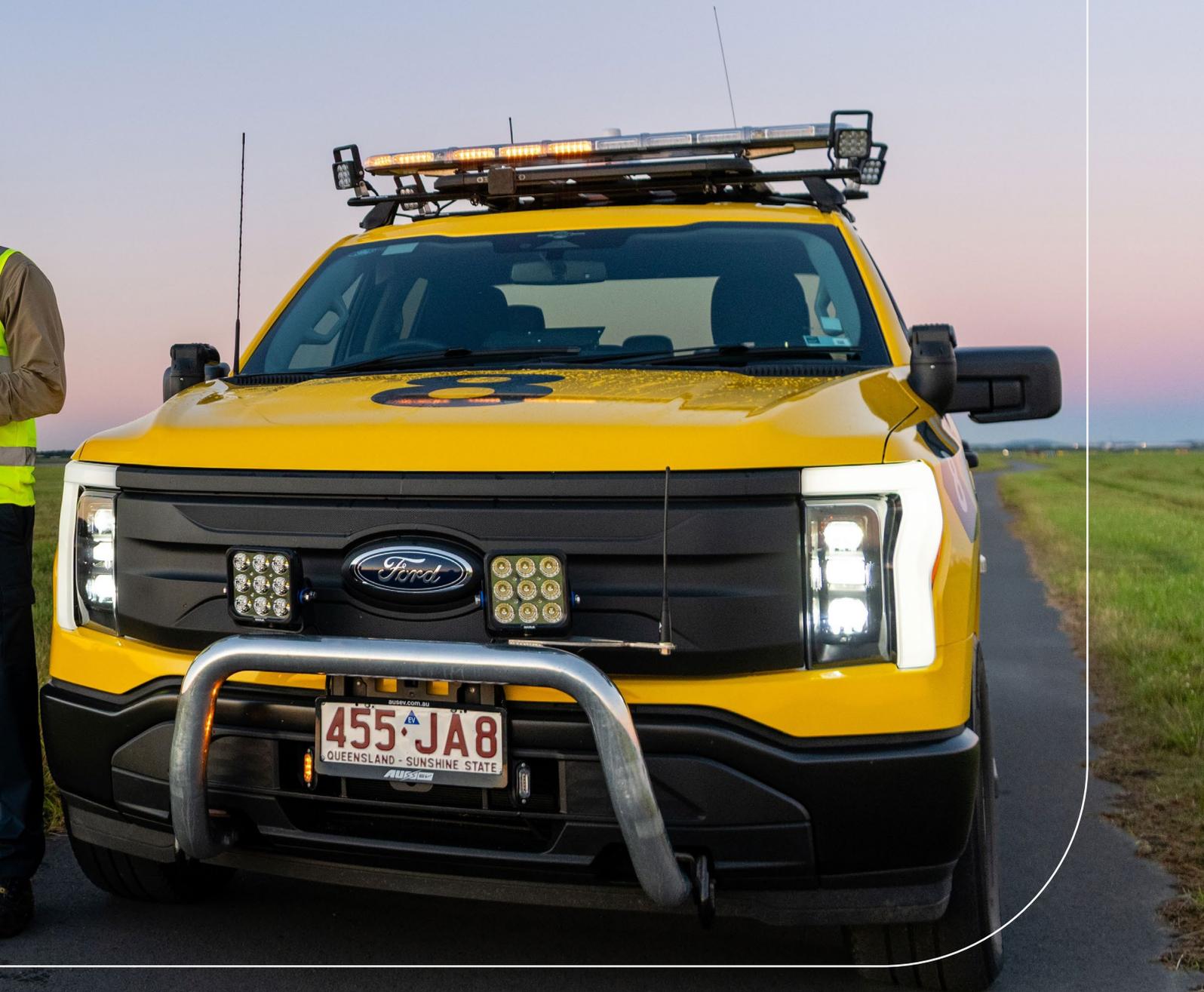
In 2025, BAC's new Corporate Strategy reaffirms our commitment to sustainable growth, ethical leadership, and positive community impact. This strategy provides the foundation for embedding social responsibility into everything we do, from major infrastructure delivery to everyday business practices.

Our actions are guided by our corporate values of Communication, Collaboration, Courage, and Care, which shape how we engage with our people, partners, and communities. These values drive our determination to be transparent, proactive, and accountable in the ongoing effort to eliminate modern slavery in all its forms.

About Us



Our Vision:
Connect the world.
Create the future.



About Us

BAC is committed to making a positive social, economic, and environmental contribution to the communities in which we operate. To achieve this commitment BAC focusses on the human rights of all our employees, our service delivery partners, contractors, and the travelling public who utilise our airport.



A local Queensland company



Operated Brisbane Airport, an award-winning hub



Proudly connects Australia with the world



Brisbane Airport: A Snapshot



1 in 70
Queensland jobs are at
or enabled by BNE



600+
Employers on airport



24/7
Operation



\$5.6 billion
Gross Value added to
Queensland economy



25,000+
Jobs on airport



24.2 million
passengers transited
through Brisbane
Airport in FY25



\$5+ billion
Investment in the airport
over the next five years



Proudly connects
Australia with the world



Australia's third
largest airport by
passenger numbers



Servicing **62 domestic**
destinations and
35 international



2
Runways



2
Terminals

Servicing 35 International Destinations

North America

Dallas Fort Worth (DFW)
Los Angeles (LAX)
San Francisco (SFO)
Vancouver (YVR)

New Zealand

Auckland (AKL)
Christchurch (CHC)
Queenstown (ZQN)
Wellington (WLG)



Asia

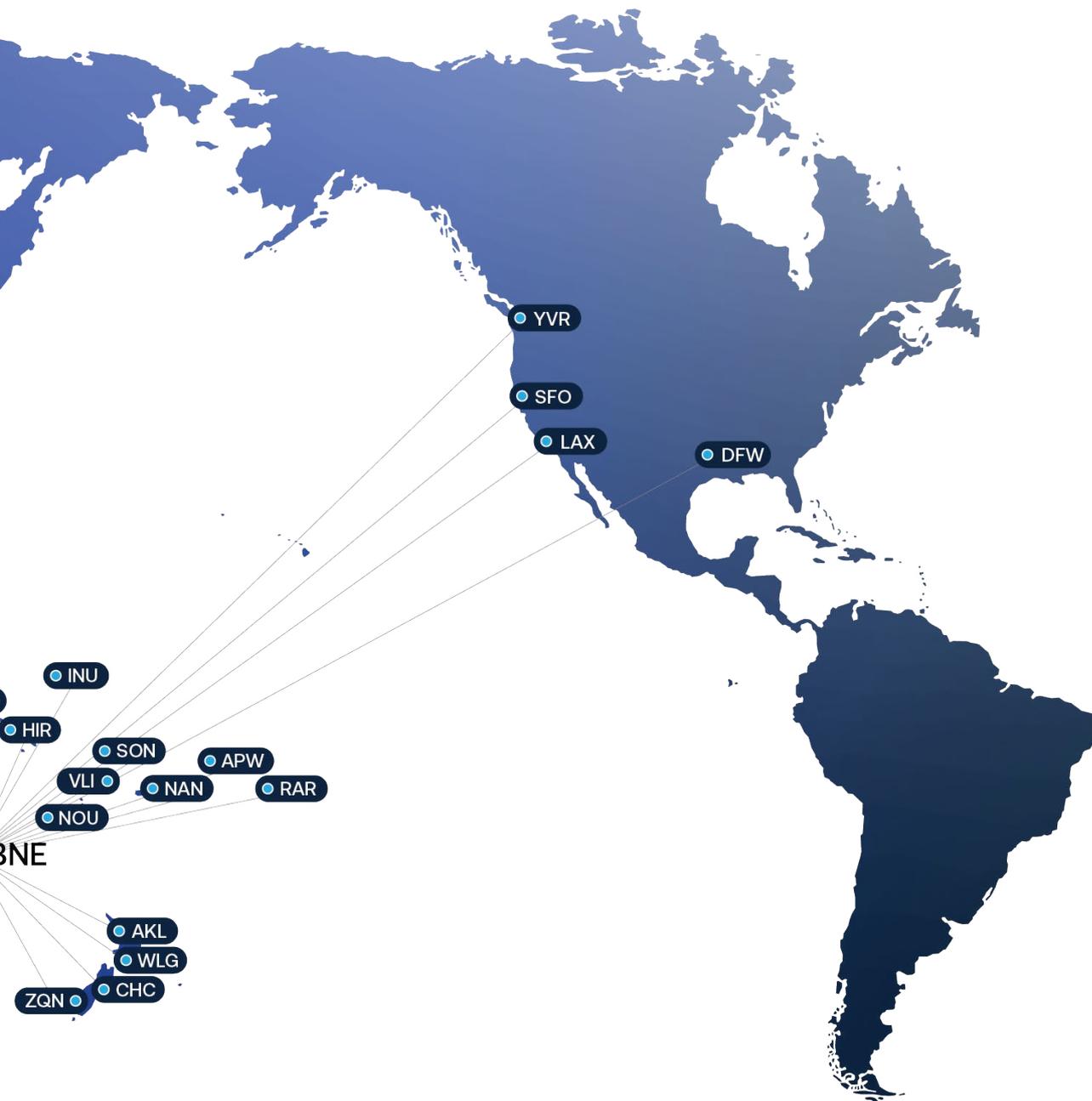
Bangkok (BKK)	Manila (MNL)
Cebu (CEB)	Osaka (KIX)
Denpasar (DPS)	Seoul (ICN)
Guangzhou (CAN)	Shanghai (PVG)
Ho Chi Minh City (SGN)	Singapore (SIN)
Hong Kong (HKG)	Taipei (TPE)
Kuala Lumpur (KUL)	Tokyo (NRT)

Middle East

Doha (DOH)	Dubai (DXB)
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South Pacific

Apia (APW)	Noumea (NOU)
Espiritu Santo (SON)	Palau (ROR)
Honiara (HIR)	Port Moresby (POM)
Munda (MUA)	Port Vila (VLI)
Nadi (NAN)	Rarotonga (RAR)
Nauru (INU)	



Ownership Structure

Brisbane Airport Corporation Pty Limited is a proprietary company limited by shares. It is part of a consolidated group, with the ultimate holding company, BAC Holdings Limited (BACH), an unlisted public company.

Our shareholders include significant Australian institutional investment funds, Australian people with their savings invested in super and one of the world’s best-known airport companies.

Over 63 per cent of BACH’s shareholders are major Australian institutional investors, including QIC, a state-owned entity that manages interests on behalf of its clients.

Ownership Structure



QIC
30.23%
 3 direct or indirect BACH shareholdings managed

igneo Infrastructure Partners
24.76%
 5 direct or indirect BACH shareholdings managed

Schiphol
20.13%
 1 direct or indirect BACH shareholdings managed

IFM Investors
20.01%
 2 direct or indirect BACH shareholdings managed

CareSuper
4.86%
 1 direct or indirect BACH shareholdings managed

*Logos reflect the investment managers representing the direct or indirect BACH shareholding in their respective portfolio.

Governance Structure

Board of Directors

- Accountability
- Recruitment and relationship with the CEO
- Vision statement and strategy
- Overseeing risk management
- Develop and improve key policies
- Monitoring management

Finance, Audit & Risk Management Committee

- Assists the Board in the following areas:
- Financial and other significant external reporting
- Financial and Tax Management matters
- Risk Management
- External and Internal Audit
- Governance matters
- Board Policy and Ethical Behaviour Frameworks

Executive Leadership Team

- Set the vision and direction
- Provide leadership and support
- Drive company culture
- Develop and implement business strategies and plans
- Ensure all the team members are adequately trained and adhere to compliance requirements

Modern Slavery Working Group

- Policy development and implementation
- Risk assessment and due diligence
- Training and awareness
- Supplier engagement
- Incident reporting and investigation
- Monitoring and continuous improvement
- External reporting and compliance
- Collaboration and advocacy

Management

- Develop and implement division strategies
- Provide leadership and support
- Drive company culture
- Ensure all the team members are adequately trained and adhere to compliance requirements

Policies that Support Governance

- Whistle Blower Protection Policy
- Modern Slavery Policy
- Code of Conduct
- Supplier Principles
- Procurement Policy
- Risk Management policy and framework

Our Strategy

Our three strategic goals set out what we will achieve between now and 2032. They help us focus our efforts and resources on the things that matter most.

Our Strategy to FY2032

Enhanced Connectivity 

Connect more people and places to enable economic, social and cultural prosperity in Brisbane and Queensland through the sustainable growth of Brisbane Airport.

Thriving Precincts 

Accelerate the development of sustainable, vibrant and people-centric terminal and property precincts at Brisbane Airport, delivering a “don’t worry, be happy” experience.

Empowered Performance 

Establish Brisbane Airport as a great place to work, do business, and partner with, by enabling safe, secure, smart, and sustainable performance.



Our Supply Chain



Our Supply Chain

Brisbane Airport Corporation's supply chain encompasses a diverse range of goods and services spanning many sectors. BAC is a management company, as we outsource key services to industry specialists. In financial year 2025, we committed \$361.9 million with 883 suppliers.

We're committed to conducting all supply chain activities in compliance with local, federal and international laws and in an ethical, fair and transparent manner always.

In FY25, BAC did not directly uncover any instances of modern slavery through our operations and supply chain, we did however investigate 2 of our suppliers for potential risks and exposure through their value chain and worked closely with the suppliers to ensure there was no risk exposure. BAC remains vigilant in our risk management of modern slavery.

*Country location is based on the supplier address for the entity BAC deals with. BAC recognises many of its suppliers have an office in Australia but may be owned overseas.

 **99%**

Australian suppliers

 **80%**

spent with top 87 suppliers

 **883**

suppliers registered with BAC

 **40%**

total OPEX for the year was \$305.2 million

 **60%**

total capital expenditure for FY25 was \$695.3 million.



Supply Chain Risks

Brisbane Airport Corporation recognises that managing modern slavery risk is a continuing responsibility that extends beyond compliance. As our business grows and diversifies, so too does the complexity of our supply chain and the need for active, transparent oversight of labour practices, materials sourcing, and service delivery arrangements.

Many of our critical service partnerships are people-centric, requiring large and often multi-layered workforces to deliver essential airport operations. While we maintain strong visibility over our direct workforce, we acknowledge that risks can emerge deeper within our extended supply chain — particularly in the procurement of uniforms, PPE, technology, and construction materials.

In recent years we have embedded modern slavery compliance requirements into all new and renewed contracts, strengthened our due-diligence processes, and undertaken targeted supplier assessments covering the majority of our total spend. These actions have established a solid foundation for continual improvement.

Looking ahead to 2026 and beyond, Brisbane Airport Corporation is moving from a reactive compliance model to a proactive risk-management approach. We are:

- Implementing an ongoing supplier assurance program that combines digital risk screening with in-person engagement.
- Expanding assessments to include Tier-2 and Tier-3 suppliers to improve transparency across the full supply chain.
- Partnering with industry and government bodies to share insights, develop standards, and strengthen the collective capability to prevent modern slavery.
- Building internal capability through training and tools that help our teams identify and respond to emerging risks early.

Our ambition is to ensure every supplier engaged by BAC operates ethically, transparently, and in alignment with our values — creating a supply chain that supports the wellbeing, dignity, and safety of all workers connected to our business.





Internal Workforce

BAC's internal workforce are engaged on either a common law contract (75%) or under a single Enterprise Agreement (25%). Those engaged under a common law contract are a very low risk in terms of modern slavery due to the individually negotiated contract 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 three to four 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 and be certified by the Fair Work Commission. As a result, the modern slavery risk within those engaged under the Enterprise Agreement is also assessed to be very low.



Direct Supply Chain

BAC has conducted a combination of supplier self-assessments and targeted risk assessments to assess the risk of modern slavery within our direct supply chain. The risk assessments have been conducted in accordance with the BAC Procurement Policy and Framework, the assessments are based on the prevalence and vulnerability factors for the suppliers' country of origin, including any parent companies. BAC 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, BAC's major suppliers have policies in place to mitigate modern slavery risks under their own modern slavery obligations. BAC periodically reviews their policies and Modern Slavery Act Statements to ensure that they are meeting their obligations.



Indirect Supply Chain

BAC 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 BAC considers more likely to be at risk of modern slavery practices occurring further down the supply chain. BAC also acknowledges that solar installations are considered an area of modern slavery risk in the construction sector.



Human Trafficking Risk

Human trafficking is a modern slavery risk that is present within the airport environment. The primary responsibility for mitigating the human trafficking risk is the Australian Border Force under the Department of Home Affairs National Action Plan to combat Modern Slavery 2020-25. BAC has established regular coordination meetings with senior Australian Border Force personnel to support the implementation of local measures to mitigate human trafficking.

Our Operations



Operational risks

At Brisbane Airport Corporation, our vision remains clear — to Connect the World and Create the Future. Over the next three years, our strategy continues to focus on connecting people, places, and possibilities through a culture grounded in safety, integrity, and shared responsibility. This includes a deep commitment to protecting human rights and preventing modern slavery across our operations and supply chains.



Action taken to address risks

We use the global supply chain tool, FRDM, which provides comprehensive visibility across multiple tiers of our supply chains.

As Australia's most connected airport, we acknowledge our vital role in safeguarding against risks such as human trafficking and exploitation. The aviation ecosystem — encompassing airlines, ground handling, border agencies, retail operators, and security services — plays a pivotal part in early detection and prevention.

We continue to partner closely with law enforcement agencies including the Australian Federal Police, Australian Border Force, and Queensland Police Service, ensuring our collective vigilance remains strong. Through our expanded Human Rights and Modern Slavery Awareness Program, every employee and contractor will have the knowledge and confidence to identify, report, and respond to potential risks.

By 2028, our goal is to embed human rights awareness into all facets of airport operations, from procurement and construction to commercial partnerships — ensuring that Brisbane Airport continues to set the benchmark for ethical and responsible aviation infrastructure.



Modern Slavery Strategic Plan



Modern Slavery Strategic Plan

Our strategy for 2026 - 2028:

01

Governance

Implement effective risk management frameworks and internal audit processes.



02

Due Diligence

Develop a risk assessment criteria and structured supplier segmentation.

03

Reporting

Create open collaboration through transparent communication between governing agencies, leadership teams and stakeholders.



04

Strategic Evolution

Drive continuous improvement and innovation to strengthen Modern Slavery prevention.

05

Training and Education

Build knowledge and vigilance to identify and prevent risks.



Assessing the Effectiveness of Our Actions

Over the past year, Brisbane Airport Corporation has continued to strengthen its commitment to ethical business practices and human rights across our operations and supply chain. I am proud of the progress achieved through the dedication of our people, partners, and Modern Slavery Working Group, whose efforts continue to elevate the standards to which we hold ourselves and those we work with.

The Board endorses the release of BAC's new corporate strategy — a forward-looking plan that reinforces our position as Australia's most connected and sustainable airport precinct. This strategy recognises that sustainable growth must be underpinned by integrity, transparency, and a deep respect for people and communities.

Our modern slavery response is a key pillar of this commitment. Over the past year, we have deepened our engagement with suppliers, enhanced our data and reporting systems, and refined our due diligence processes. These actions ensure that the values of respect and responsibility are embedded throughout our business relationships.

I acknowledge the continued dedication of the Modern Slavery Working Group and the leadership team for embedding continuous improvement and accountability across all levels of the organisation. Through this work, BAC continues to demonstrate that responsible procurement and strong governance are essential to long-term success.

The Board remains committed to supporting ongoing collaboration with our industry partners — including airlines, regulators, law enforcement agencies, and service providers — to identify risks, strengthen awareness, and promote collective action.

As we look to 2026 and beyond, our focus will remain on transparency, improvement, and the shared responsibility to safeguard human rights. Together, we will continue to build a culture where ethical practice is not just expected but exemplified in everything we do.



David Peever
Chair, Brisbane Airport Corporation
Brisbane Airport Corporation | 2025 Modern Slavery Statement

Compliance with Mandatory Reporting Criteria

	MANDATORY CRITERIA	REFERENCE IN THIS STATEMENT
1	Identify the reporting entity	Page 4-5
2	Describe the reporting entity's structure, operations and supply chain	Page 7-13
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	Page 14-22
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	Page 23-25
5	Describe how the reporting entity assesses the effectiveness of these actions	Page 26
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)	Page 26

CONTACT

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Slavery Working Group

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