

# MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR ENDING DECEMBER 2023

SWISSPORT ANZ PTY LTD ACN 167 311 551 & SWISSPORT PTY LTD ACN 151 147 303



**INTRODUCTION**

As a global leader of ground services and cargo handling for the aviation industry, Swissport is committed to ensuring there is transparency in our business and in our approach to addressing modern slavery throughout our supply chains.

Every Swissport employee in Australia is guided by and required to comply with Swissport’s Code of Conduct which contains a number of key principles including the recognition of human rights, behaving with integrity, respect for other cultures and acting responsibly within our communities and towards society at large.

This statement, which is intended to meet the requirements of the *Modern Slavery Act 2018 (Cth) (Act)*, describes the steps taken by the reporting entities, Swissport ANZ Pty Ltd ACN 167 311 551 and Swissport Pty Ltd ACN 151 147 303, and its Australian controlled entities, being:

- (a) Prime Vantage Pty Ltd ACN 151 250 127;
- (b) Australian Ground Services Pty Ltd ACN 052 961 752;
- (c) AGS Logistics Pty Ltd ACN 080 210 180;
- (d) Swissport Australia Pty Ltd ACN 103 196 701 as trustee for the Swissport Australia Unit Trust;
- (e) Carbridge Pty Ltd ACN 050 099 342; and
- (f) Aspire Lounges Australia Pty Ltd ACN 627 491 070,

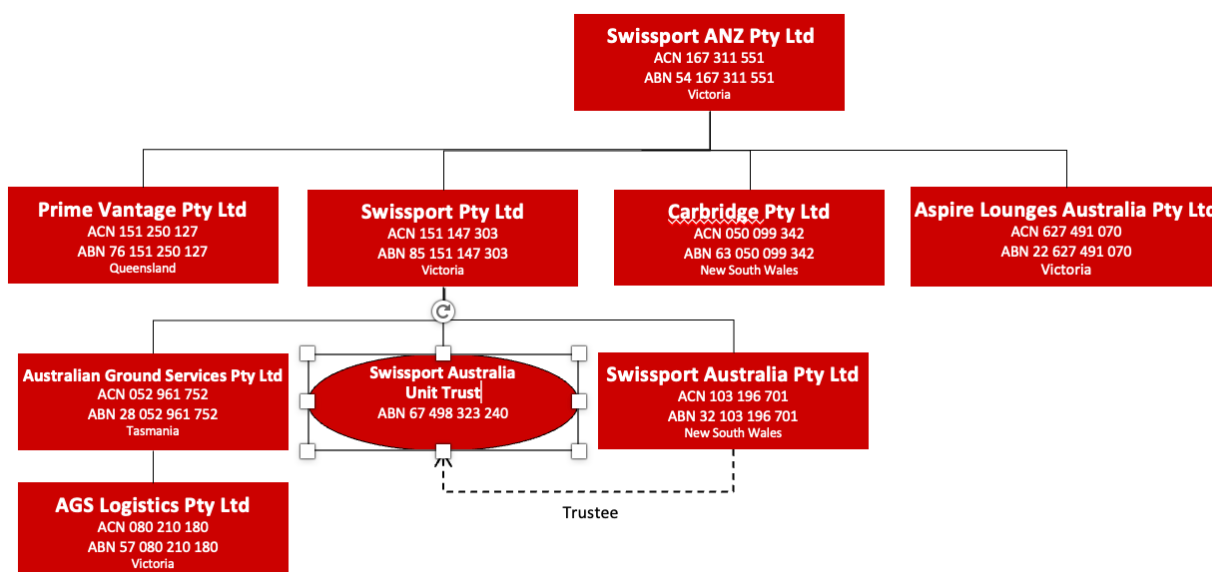
(Swissport Australia, we, us, our) during the financial year ending 31 December 2023 (2023 Reporting Period) to seek to minimise the risk of modern slavery occurring in our business and supply chains.

**BUSINESS OVERVIEW**

**OUR STRUCTURE AND OPERATIONS**

The broader group of Swissport companies (**Swissport Group**) is the global leader of ground services and cargo handling for the aviation industry. Swissport Australia is part of the Swissport Group whose operating parent company is Swissport International AG, based in Zurich, Switzerland. The ultimate holding company of the Swissport Group is Radar Topco S.A.R.L.

A diagram of Swissport Australia’s corporate structure is set out below.



As at December 2023, the Swissport Group had approximately 60,000 employees worldwide and operated in 44 countries. Further information about the Swissport Group is available [here](#).

Swissport Australia operates at 17 airports in Australia, partnering with all major domestic airlines and many international carriers.

Swissport Australia (including its predecessor entities) has for more than 20 years been proudly contributing to Australia's regional, state and national economies through our business. Swissport Australia generates the majority of its revenue by providing airport ground services, which include:

**Passenger services**, including:

- (a) check-in and gate;
- (b) passenger mobility;
- (c) lounge hospitality;
- (d) executive aviation; and
- (f) lost and found.

**Ramp services**, including:

- (a) baggage services;
- (b) de-icing;
- (c) moving of aircraft; and
- (d) aircraft cleaning.

**Transport Services**, including:

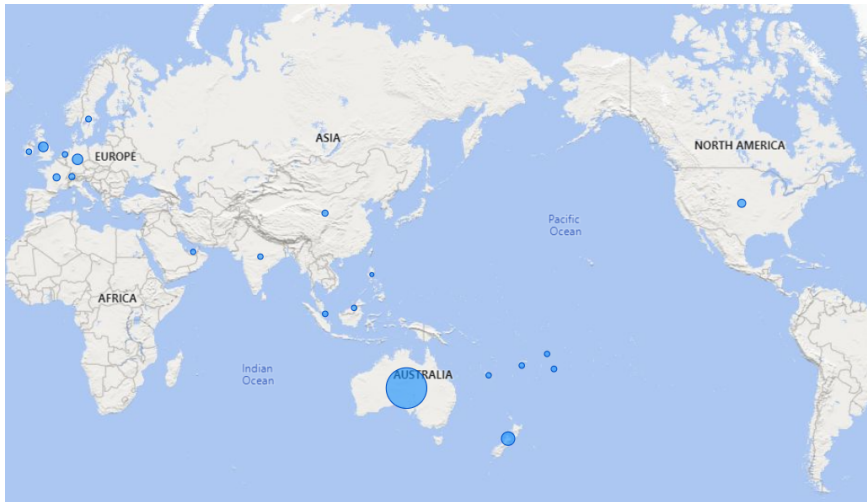
- (a) bussing services within the airport and to/from the airport and metropolitan areas; and
- (b) baggage trolley services within the airport.

## **OUR SUPPLY CHAIN**

Our supply chain primarily comprises the purchase of products and services needed for our day-to-day operations including:

- (a) In relation to the airport ground services:
  - (i) corporate uniforms;
  - (ii) ground support equipment;
  - (iii) ground support equipment maintenance services;
  - (iv) bussing vehicles;
  - (v) bus maintenance services;
  - (vi) baggage trolleys; and
  - (vii) cleaning services.
- (b) In relation to administration/business support services:
  - (i) information technology and communications;
  - (ii) property services (including facilities management, utilities, cleaning and waste management);
  - (iii) consulting services;
  - (iv) marketing services;
  - (v) print and promotional goods; and
  - (vi) office supplies.

Of our third party spend in the 2023 reporting year, 87.5% was with companies located in Australia, with a further 10% with companies located in New Zealand, Germany and the United Kingdom (**Suppliers**). When considering the supply chain of our Suppliers, the manufacturing of corporate uniforms and ground support equipment occurs in locations such as China, which has a higher risk of modern slavery.



Graph 1: Percentage of Swissport Australia's spend, by vendor location.

Regardless of a Supplier's location, the type of spend is assessed to determine higher risk categories, such as equipment and parts manufacturing, contingent labour (including cleaning services) and corporate goods. Suppliers of these higher risk goods and services undergo additional due diligence, which may involve the internal review of modern slavery statements if they are a reporting entity, inclusion of the contractual obligation to comply with the Swissport Supplier Code of Conduct, and other activities as relevant to the specific risk profile of the Supplier company.

### MODERN SLAVERY RISK ASSESSMENT AND MANAGEMENT

The Swissport Group is committed to eliminating all forms of modern slavery (including slavery-like practices, servitude and forced or compulsory labour and human trafficking). The Swissport Group has been a participant in the [United Nations Global Compact](#) since 2011 and is committed to upholding the elimination of all forms of forced and compulsory labour (Principle 4) and to upholding the effective abolition of child labour (Principle 5). The Swissport Group's [2022 Company Report](#) (at pages 82 - 87) and [2022 Communication on Progress Report](#) set out the Swissport Group's commitment to the United Nations Global Compact. We are committed to continuously improving transparency within our business and operations. We do not tolerate any instances of modern slavery.

As part of the Swissport Group, Swissport Australia is also aligned to the group-wide [Code of Conduct \(Code of Conduct\)](#). The Code of Conduct is based on a number of key principles, including:

- (a) behaving with integrity and in compliance with the law;
- (b) the recognition of internationally proclaimed human rights;
- (c) respect for other cultures and opinions; and
- (d) acting responsibly towards society.

The Code of Conduct is an integral part of Swissport Australia's corporate governance. The Code of Conduct applies to the Board of Directors and all employees (including contractors). Individuals are personally obliged to abide by the Code of Conduct and its supplementing internal regulations and directives.

It is the responsibility of Swissport Australia's training department to ensure that the Code of Conduct is included in all staff training.

We continue to consider the risk of modern slavery within our direct business operations in Australia to be low during this reporting period. However, we recognise that through our supply chains, we can be indirectly exposed to the risk of modern slavery.

The most significant risks associated with our supply chain for the 2023 Reporting Period remain indirect and fall into the following two key areas:

- (a) The potential supply risk of purchasing clothing and uniforms from suppliers involved in modern slavery with such practices as forced or compulsory labour and/or low wages, penalties and excessive working hours associated with the manufacturing of those

products.

- (b) The potential supply risk of purchasing ground support equipment and bussing vehicles (including spare parts) from suppliers involved in modern slavery with such practices as forced or compulsory labour and/or low wages, penalties and excessive working hours associated with the manufacturing of the equipment.

In line with continuous improvement, our approach to preventing and mitigating the risk of modern slavery in these areas during the 2023 Reporting Period included:

- (a) initial supplier due diligence and ongoing adherence to Swissport values, including the Supplier Code of Conduct (via contractual means where possible);
- (b) framework of policies and procedures including Swissport anti-bribery and anti-corruption policies, which are continually reviewed and improved;
- (c) providing employee training at the commencement of employment and regular updating of training;
- (d) continuously updated internal grievance resolution procedures and guidelines which employees can access;
- (e) Speak Up Hotline and whistle-blower policies (see “Reporting and Monitoring Mechanisms” below for more detail). The Speak Up Hotline enables employees, and employees are encouraged, to report matters, including breaches of law and violation of human rights, via phone or email with the option of remaining anonymous. The rights of those who report such matters in good faith are protected in accordance with law; and
- (f) investigations and analysis of complaints and grievances received through the above mechanisms. Following investigations of issues, we take appropriate steps to address matters once substantiated.

During the 2023 Reporting Period, we did not become aware of any instances of modern slavery in our supply chain or operations. We continue to be mindful and aware of any additional modern slavery key risks within our supply chain for future reporting periods.

## SUPPLIER CONDUCT

As part of the Swissport Group, Swissport Australia is also aligned to the group wide [Supplier Code of Conduct](#) (**Supplier Code of Conduct**). The Supplier Code of Conduct is based on a number of key principles, including:

- (a) avoidance of child labour;
- (b) rejection of any bribery or corrupt behaviour;
- (c) environmental management;
- (d) freedom of association;
- (e) freely chosen employment;
- (f) health & safety;
- (g) human rights;
- (h) non-discrimination; and
- (i) fair working conditions.

All Swissport Australia suppliers are expected to comply with the Supplier Code of Conduct. Where possible, we ensure that supplier agreements include a contractual condition that suppliers will comply with our Supplier Code of Conduct, including the prioritisation of human rights such as non-discrimination and the rejection of child labour and forced and compulsory labour. Many of the supplier agreements we entered into in the 2023 Reporting Period included the requirement to comply with our Supplier Code of Conduct. Any non-compliance with the obligations under the Supplier Code of Conduct would provide Swissport Australia with a right to terminate the applicable supply contract.

Within our supplier contracts, we have also identified the importance of ensuring an audit of supplier operations to monitor compliance with our Supplier Code of Conduct and other applicable laws.

## TRAINING

To raise awareness of the risks of modern slavery and human trafficking, we have brought the contents of the United Nations Global Compact, the Code of Conduct and the Supplier Code of Conduct to the attention of all employees by publishing it on the Swissport Group internal portal.

We also ensure that all new employees receive training on the Code of Conduct, which is renewed annually, and aim to continue to improve our regular training on our Code of Conduct, including modern slavery risk awareness.

## REPORTING AND MONITORING MECHANISMS

Swissport Group employees are encouraged to report breaches of Swissport’s Code of Conduct and/or any concerns of illegal or unethical conduct to their line manager or HR department in accordance with our whistleblower policy. Alternatively, they may report allegations via the Speak Up Hotline, a service hosted on behalf of the Swissport Group by an independent third party. Reports may be made to the Speak Up Hotline via phone or secure website and may be made anonymously.

Reports are triaged by the Swissport Group’s legal department and any allegations of breach, including suspicions of modern slavery practices, will be investigated and then referred to the relevant authorities, where applicable.

During the 2023 Reporting Period, we had nil reports made to us on concerns of suspected breaches of our Code of Conduct regarding suspected modern slavery conduct. We will continue to monitor and investigate any reports as appropriate, and we will continue to implement such mechanisms in the future.

## ASSESSING OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY

To ensure that modern slavery is not taking place in any part of our business or supply chains, we recognise the need to use various monitoring metrics, both qualitative and quantitative, which are summarised in the following table:

Action	Metric
Supplier conduct	Number of supplier contracts with a contractual obligation to adhere to the Supplier Code of Conduct.
Training	Number of people within our business who receive training via Code of Conduct training, whether as new employees or as part of the annual training requirements.
Reporting and monitoring mechanisms	Number of people who report issues concerning modern slavery, including via the Speak Up Hotline. Number of reported issues escalated to the board of Swissport Australia.

These monitoring metrics have allowed us to assess our progress in combatting modern slavery risks, with results in the past few years showing an increase in the number of supplier contracts with contractual obligations to comply with our Supplier Code of Conduct, along with an increase in training being provided resulting in increased awareness of our employees. We aim to continue to assess our modern slavery risk identification and mitigation practices through these monitoring metrics during our next reporting period and will highlight these in our next modern slavery statement for the 2024 Reporting Period.

## FUTURE ACTIONS PLANNED FOR 2024 REPORTING PERIOD

In the 2024 Reporting Period, we aim to improve our modern slavery risk assessment and reporting practices by:

- (a) including the Supplier Code of Conduct in the new supplier onboarding email; and
- (b) exploring additional due diligence mechanisms for us to adopt when assessing our practices and our supply chain risks.

## **OVERSIGHT AND GOVERNANCE**

Swissport ANZ Pty Ltd and Swissport Pty Ltd, and its controlled entities are governed within the same management systems, frameworks, policies and procedures. In addition, each of the controlled entities' three directors sit on the board of Swissport ANZ Pty Ltd. On this basis, the modern slavery risks within the business are identified, assessed and addressed centrally and uniformly for each entity. There have been no changes to the structure and governance of Swissport ANZ Pty Ltd and Swissport Pty Ltd, and its controlled entities in the 2023 Reporting Period. We will continue to provide updates on our governance and structure into the future.

## **CONSULTATIONS WITH SWISSPORT GROUP AUSTRALIAN CONTROLLED ENTITIES**

Swissport ANZ Pty Ltd, Swissport Pty Ltd and their Australian controlled entities are governed under the same management system, policies and procedures, with directors of each controlled entity sitting on the Swissport Australia board. During the 2023 Reporting Period, Swissport Australia consulted and actively engaged all Australian controlled entities in the development of this joint Modern Slavery Statement.

We continued to provide details of the Act and its reporting requirements to all controlled entities in the 2023 Reporting Period, along with Swissport Australia's proposed actions to address the impacts of modern slavery in this statement.

## **LOOKING FORWARD**

As a member of the global aviation business community, Swissport Australia acknowledges both its moral and legal obligations to ensure that human rights are upheld and the risks of modern slavery within its supply chains are mitigated to the greatest extent possible. We aim to continue to improve, strengthen and build upon our current proposed actions in addressing modern slavery risks for future reporting periods.

It is Swissport Australia's intention to further prioritise the assessment and monitoring of modern slavery risks in our supply chain and to further integrate these practices into our procurement framework going forward.

This statement has been approved by the Board of Directors of Swissport ANZ Pty Ltd ACN 167 311 551 and Swissport Pty Ltd ACN 151 147 303 and signed by Brad Moore as a director and the Chief Executive Officer of Swissport ANZ Pty Ltd.



**Brad Moore**  
**Chief Executive Officer**

19 June 2024