

FY24 CANBERRA AIRPORT MODERN SLAVERY STATEMENT

MODERN SLAVERY ACT 2018 (CTH)

Canberra Airport Holdings Pty Limited

ABN 98 008 608 928

Capital Estate Developments Pty Limited

ACN 137 573 623 as trustee for Capital Estate Development Trust

CT Investments Group Pty Limited

ABN 74 634 004 907

Statement

This is the joint modern slavery statement for the Canberra Airport Group for the financial year ending 30 June 2024, pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (**Act**).

The specific reporting entities within the group are:

- 1. Canberra Airport Holdings Pty Limited ABN 98 008 608 928 (CAH);
- 2. Capital Estate Developments Pty Limited ACN 137 573 623 as trustee for Capital Estate Development Trust (**CED**); and
- 3. CT Investments Group Pty Limited ABN 74 634 004 907. (together, **Reporting Entities**)

In accordance with the requirements of the Act, we provide information about:

- the reporting entity.
- the reporting entity's structure, operations and supply chains.
- the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.
- 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.
- an assessment of the effectiveness of these actions.
- consultation with any entities the reporting entity owns or controls.

The boards of the Reporting Entities have approved this statement under clause 13(2)(c) of the Act.

Stephen Carson Company Secretary and Chief Financial Officer

Dated 17 December 2024

The reporting entity

The Reporting Entities are:

- 1. Canberra Airport Holdings Pty Limited ABN 98 008 608 928 (CAH);
- 2. Capital Estate Developments Pty Limited ACN 137 573 623 as trustee for Capital Estate Development Trust (**CED**); and
- 3. CT Investments Group Pty Limited ABN 74 634 004 907 (CTIG).

The reporting entity's structure, operations and supply chains

Canberra Airport Group is a consolidated family-owned group. Each of the Reporting Entities form part of the Canberra Airport Group. Canberra Airport Group engages in airport operation, commercial and residential property development (both on its own account and in conjunction with other development groups) as well as agricultural activities in the ACT, NSW and Queensland.

CAH is a holding company for the airport lessee company operating Canberra Airport.

CED is undertaking residential land development of Denman Prospect, one of Canberra's newest suburbs. CED was established in 2015.

CTIG is a diversified group, pursuing agricultural, residential land, commercial retail and commercial property opportunities, including via investments in joint ventures.

As at 17 December 2024, there are a total of 245 direct employees and 2 staff employed under contract within the Reporting Entities.

The group has a varied range of supply chains across the various activities undertaken by entities within the group.

Airport/aviation

- Financiers
- Accountants/auditors
- Lawyers
- Stationery suppliers
- Indoor plant hire
- Cleaners
- Security
- Baggage System
- Airfield lighting and navigation aids

- Telecommunications
- IT Services
- Designers/Architects
- Builders and tradespeople
- Fencing contractors
- Environmental Consultants
- Geotechnical Consultants
- Noise Consultants
- HVAC Engineers
- Fire Services Technicians
- Waste removal
- Civil works contractors
- Engineers (aircraft, civil, structural, mechanical, hydraulic, electrical)
- Parking control systems (aircraft and motor vehicle)
- Providores
- Utilities (water, power, gas)

Property development and management

- Financiers
- Planners
- Lawyers
- Designers/architects
- Engineers (civil, structural, mechanical, hydraulic, electrical)
- Civil Works contractors
- Environmental Consultants
- Geotechnical Consultants
- Builders
- Landscapers
- Waste removal
- Arborists
- Parking control systems (motor vehicle)
- Telecommunications
- Utilities (water, power, gas)

The risks of modern slavery practices in the operations and supply chains of the Reporting Entities

With the range of inputs and diversity of activities within the group, there is the potential for exploitative work practices to occur in the supply chains.

The Group places significant reliance on suppliers who rely on other suppliers. It has limited visibility of the supply chains of its suppliers. It also expends significant amounts on finished products, including plant and equipment and information technology.

The actions taken by the Reporting Entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Employees within the Group are engaged on the basis of modern awards and are paid according to those awards.

The majority of contractors within the Group are Australian-based, supplying Australian-based labour – particularly in capital works projects. The Group has a preference for engaging local Canberra and regional businesses. There are personal relationships between those businesses and the Group which have grown together over time.

The Group undertakes and regularly updates its supply chain mapping and includes in its risk management agenda, supply chain risk.

The Group engages in tender due diligence with its contractors to understand labour practices. It includes modern slavery provisions in its tender response schedules and has incorporated periodic reporting obligations in its contract documentation, including supply chain investigation.

The Group prioritises engaging in business relationships with local companies, companies it has worked with previously, and those with whom it has strong relationships developed over time. This allows a high level of transparency in the working relationships. The Group undertakes substantial due diligence when engaging with 'unknown' suppliers. Working primarily with known suppliers and businesses reduces the risk of unknowingly working with entities engaging in modern slavery or other illegal practices.

Assessing the effectiveness of these actions

The Group assesses the effectiveness of its actions according to the level of complaints reporting.

For the current reporting period, no complaints have been received or investigations undertaken.

Consultation with any entities within the Group (a joint statement must also describe consultation with the entity giving the statement)

There is no formal process of consultation between the entities of the Group as this is deemed to be unnecessary given the inherently interlinked nature of the Group. The family-owned consolidated group has common officers, staff and administrative support structures.