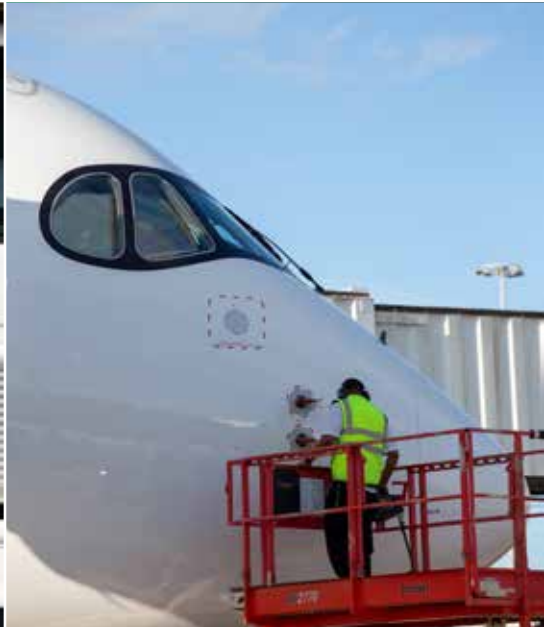


# MODERN SLAVERY STATEMENT 2024



## 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.

### **About this statement**

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 2024 (financial year 2024). The Statement builds on our financial year 2023 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 29 November 2024.

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# CEO MESSAGE



**At Brisbane Airport Corporation, we remain steadfast in our commitment to eradicating modern slavery across all aspects of our operations and supply chain.**

As we move into 2025, we recognise the need to continually progress our awareness and training to ensure that our entire team, from frontline staff to our procurement partners, understands the critical role we all play in combating modern slavery.

I am pleased that we did not identify any instances of modern slavery in our business undertakings in 2024, but we remain vigilant to the risk.

In 2025, we are focused on embedding robust systems to detect and prevent instances of modern slavery in our supply chain. We will continue to work closely with our suppliers, holding them to the highest ethical standards, and providing targeted training programs for our employees to increase vigilance and drive accountability.

Our overarching values of Collaboration, Communication, Care, and Courage guide us on this journey towards our vision of Connecting the World and Creating the Future. Together, we will make meaningful strides towards a safer, fairer working environment for all, contributing to a future where modern slavery has no place in the world.

**Gert-Jan de Graaff**

CEO – Brisbane Airport Corporation

# KEY ACHIEVEMENTS FROM STRATEGIC PLAN IN 2024



Financial year 2024  
Modern Slavery  
Statement submission



Assessed another 20  
suppliers, the next  
21-40 on a risk basis



Monitor supply  
chain updates



Annual FARM  
Committee and  
Board update



Executive  
Leadership Team  
6-monthly update



Engage industry  
peers



# 2025 KEY AREAS FOR ACTION

Key areas of action in financial year 2024 and goals for financial year 2025

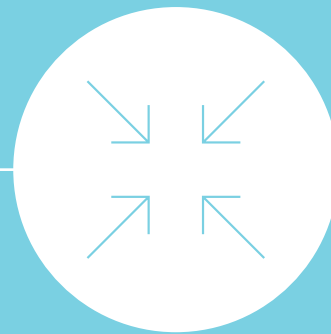


**FY24**

Issued 65 Supplier Assessment Questionnaires to highest risk suppliers. 55 questionnaires were submitted and evaluated.

Provided targeted awareness training to 18 staff (12 internal, 6 external) using the AFP training module.

Implemented new Modern Slavery clauses in all BAC standard contracts.



**FY25**

Commence development of Modern Slavery pre-tendering check.

Roll out a new compulsory (not mandated) training awareness package to all BAC Staff.

Encourage and support our service providers with their modern slavery awareness.

Carried over from 2024 - review risk rating for revenue partners\*

\*Assessment of revenue partners was not able to be conducted in financial year 2024 due to internal prioritisation of existing supplier assessments and resource availability to complete this task.

# INTRODUCTION

Brisbane Airport Corporation's Modern Slavery Statement outlines the steps taken during 2024 to address the risks of modern slavery and human trafficking within our supply chain and operations, as well as our plans for further actions in 2025.

In an increasingly complex and interconnected world, maintaining strong oversight and transparency across all areas of our supply chain and operations is crucial. Public awareness and expectations around modern slavery continue to evolve, making it more important for organisations to understand and effectively manage these risks.

Throughout 2024, we maintained our focus on identifying and addressing both existing and emerging risks across our business. Brisbane Airport's commitment to continually strengthening its practices in combatting modern slavery is driven by our core values:

*Communication* →

*CARE*

*COLLABORATION*

*COURAGE*



# ABOUT US







OUR VISION  
CONNECT THE WORLD.  
CREATE THE FUTURE.

# ABOUT US

BAC are 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**

---



**Operates 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



**\$4.7+ billion**  
Total contributions to GDP



**20,000**  
Jobs on airport



**22.6 million**  
passengers transited through  
Brisbane Airport in FY24



**\$5.0+ billion**  
Investment in the  
next decade



**Proudly connects**  
Australia with the world



**One of Australia's**  
largest airports



**Servicing 60 domestic**  
destinations and  
**29 international**

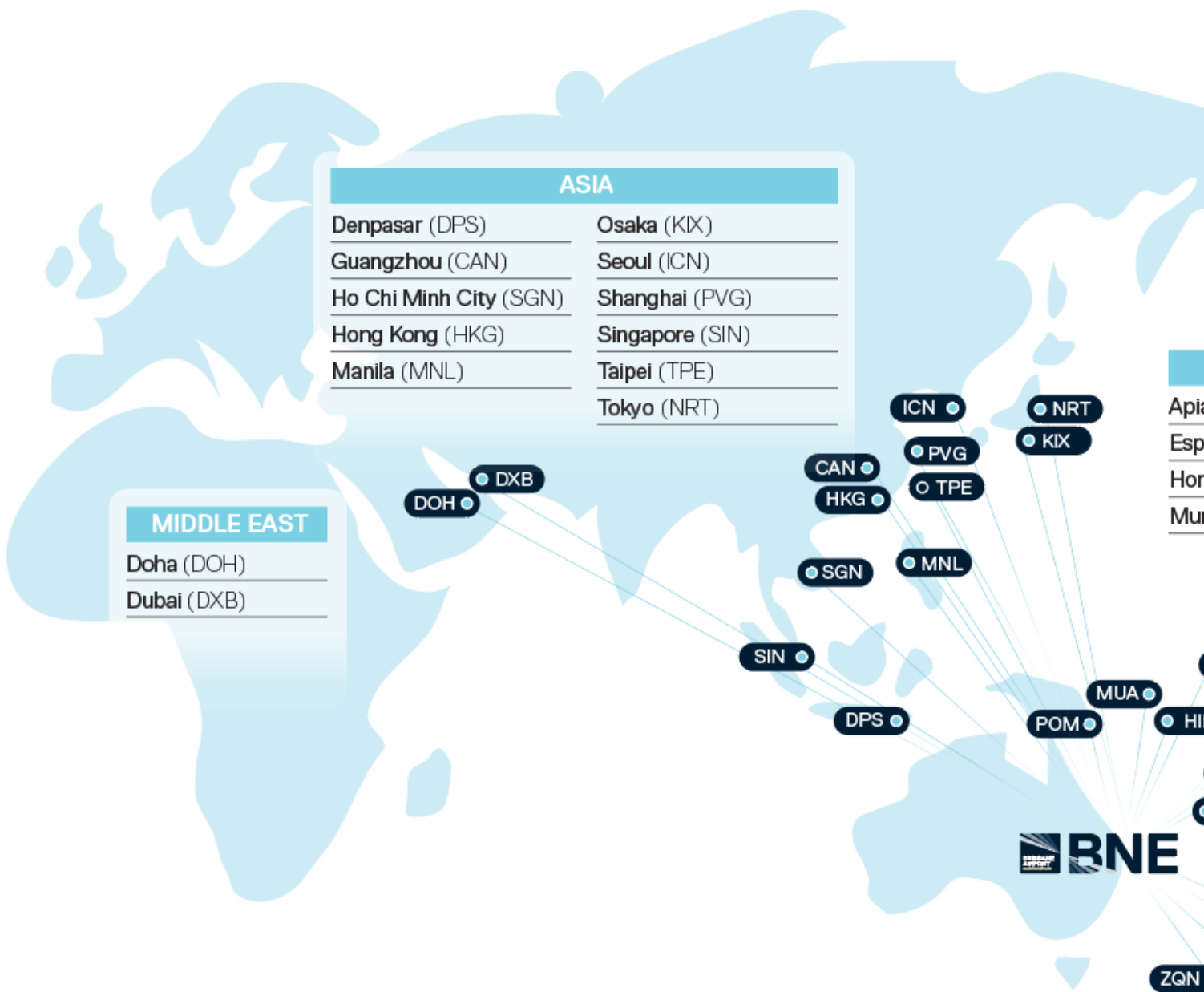


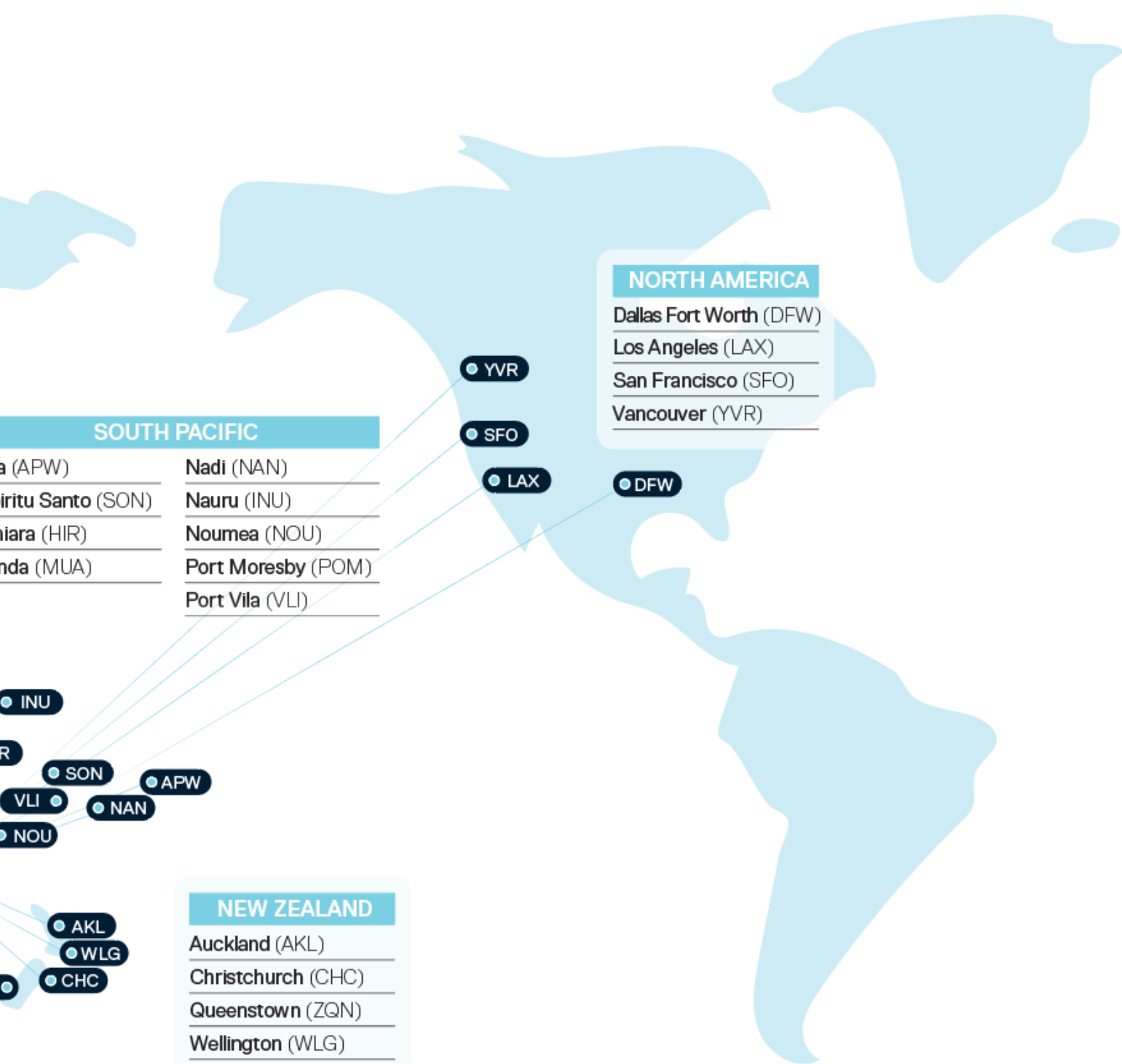
**2**  
Runways



**2**  
Terminals

# SERVICING 29 INTERNATIONAL DESTINATIONS





**NORTH AMERICA**

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

**SOUTH PACIFIC**

Perth (APW)	Nadi (NAN)
Spirit of Tasmania (SON)	Nauru (INU)
Honiara (HIR)	Noumea (NOU)
Port Moresby (POM)	Port Vila (VLI)

**NEW ZEALAND**

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

# 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 mums and dads 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.



**4.9%**

1 direct or indirect BACH shareholding managed

**Schiphol**

**19.6%**

1 direct or indirect BACH shareholding managed

**IFM Investors** 

**20.0%**

2 direct or indirect BACH shareholdings managed

**QIC**

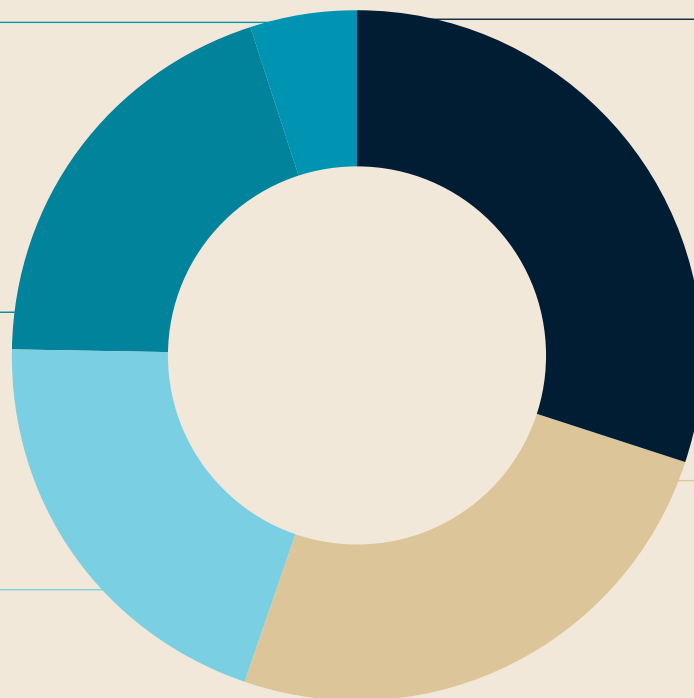
**30.2%**

4 direct or indirect BACH shareholdings managed

**igneo** Infrastructure Partners

**25.3%**

4 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 AND 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 STRATEGIC PROGRAMS



## AVIATION

Aviation Recovery  
& Growth

---

Smart  
Airport



## PROPERTY

Sustained  
Momentum

---

Destination  
BNE



## CONSUMERS

Shaping the Future of  
Parking & Transport

---

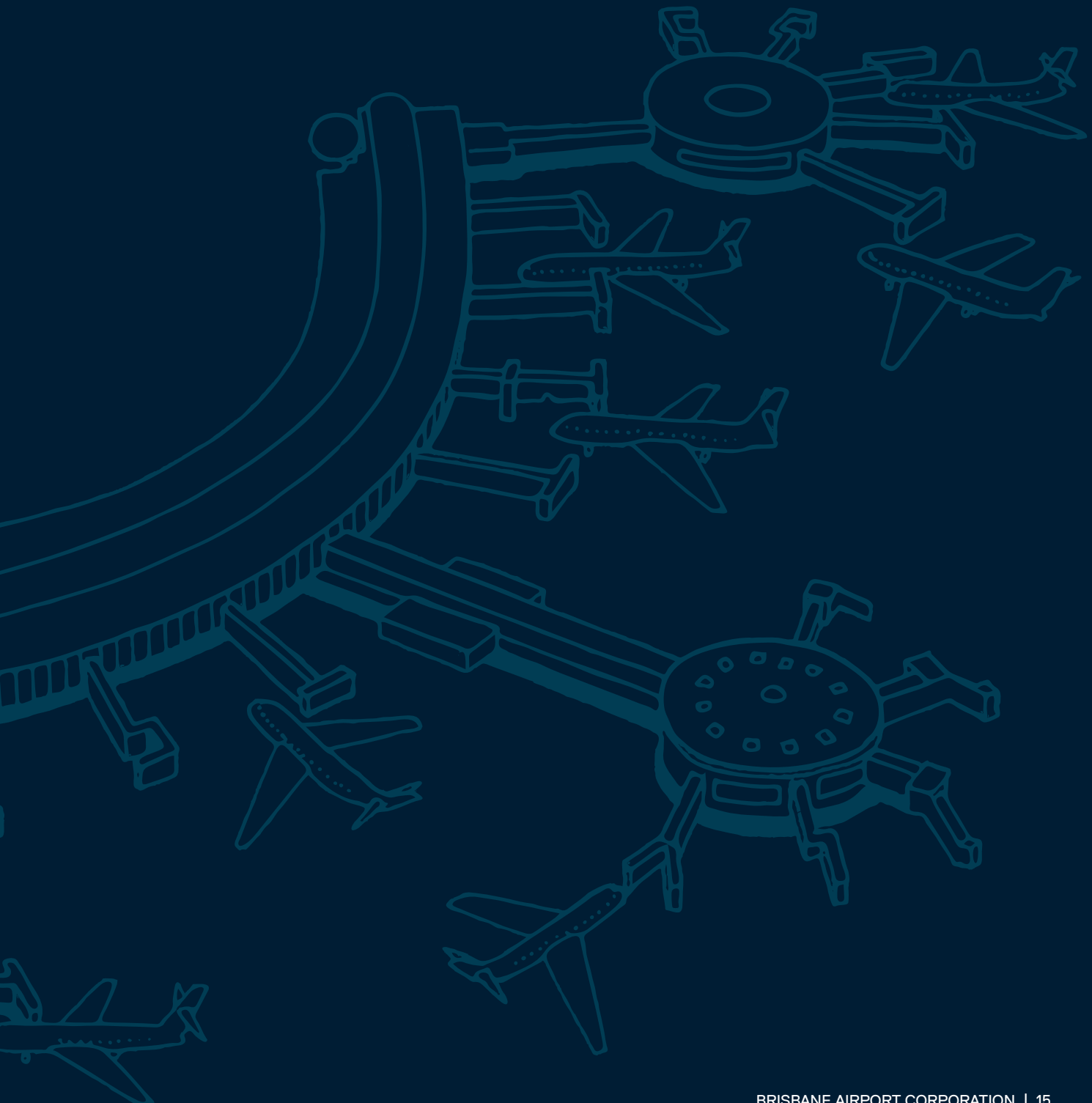
Aspirational Airport  
Retail

---

Licence to Grow



# 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 considered a management company, as we outsource key services to industry specialists. In financial year 2024, we committed \$216 million with 777 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 financial year 24, we did not identify any instances of modern slavery through our operations and supply chain, however, remain vigilant given the nature of our business as a major point of entry and exit for Australia.

\*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 57 suppliers

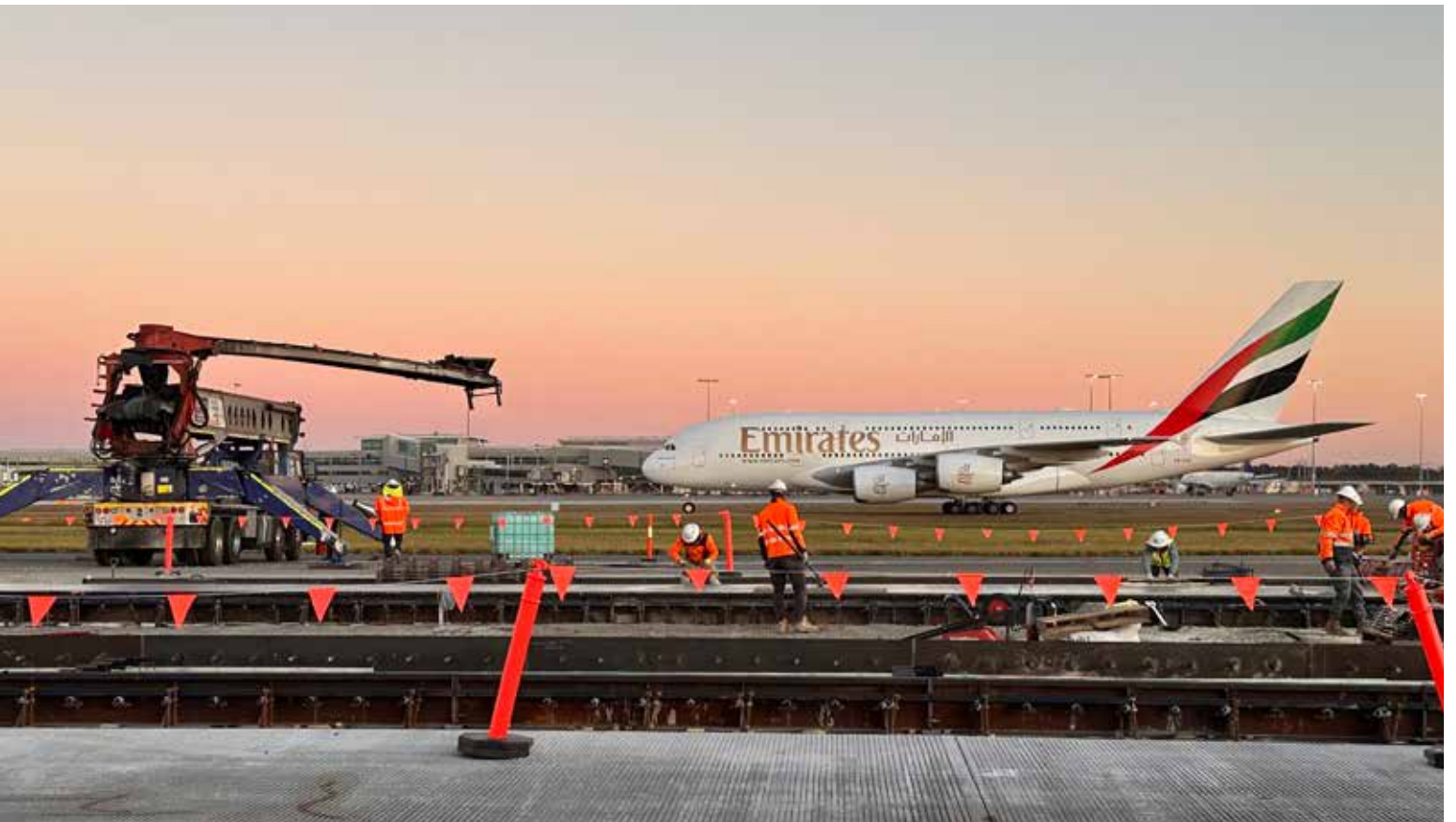
**45%**  
of total spend Property  
& Infrastructure

**44%**  
of OPEX spend on  
security services

**46%**  
Total OPEX for the year  
was \$273.7 million.

**54%**  
Total capital expenditure  
for FY24 was \$325.4  
million.





# SUPPLY CHAIN RISKS

**Brisbane Airport Corporation recognises the heightened risk of modern slavery within our supply chain due to the nature of certain services and goods provided.**

As many of our service contracts are people-centric, they require a significant workforce to support airport operations and deliver essential services.

As a business, we have visibility over the direct labour provided, however there are areas of the extended supply chain, such as uniform, PPE, and technology procurement, where we have less oversight.

To address these challenges, we have strengthened contracts with specific requirements for service providers to ensure compliance with modern slavery legislation.

In financial year 2024, we conducted modern slavery assessments with over 60 of our suppliers, representing our top 80% of spend, with all responses indicating no identified risks.

Moving forward, we are committed to expanding this approach in financial year 2025 by developing a proactive assessment process. This new initiative will see suppliers, both current and prospective, evaluated for modern slavery compliance before entering into any contracts.



## 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. Solar installation works include complex and informal subcontracting.



## 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 measure to mitigate human trafficking.

# OUR OPERATIONS





# OPERATIONAL RISKS

**At Brisbane Airport Corporation, our vision is to Connect the World, Create the Future. This means connecting people, places, and businesses, reuniting family and friends, and supporting tourism, cultural exchange, and economic growth.**

As a major international gateway, we recognise that the airport can also be a potential entry and exit point for trafficked persons.

The entire aviation community—including airports, airlines, security screening officers, retail staff, customs teams—plays a critical role in combating human trafficking.

At Brisbane Airport Corporation, we support law enforcement agencies on-site, including the Australian Border Force, the Australian Federal Police, and the Queensland Police Service, by raising awareness and training our staff to recognise the signs of human trafficking.

We have provided awareness training to our team and are committed to expanding these efforts. In financial year 2025, we will introduce a new Modern Slavery Awareness Training program to ensure all our employees have the tools and knowledge needed to identify and minimise risk.

In addition, we will strengthen our partnerships with service providers to ensure their staff also receive appropriate training, reinforcing our collective responsibility in safeguarding human rights.



# ACTIONS TAKEN TO ADDRESS RISKS

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

This tool allows us to filter our supply base by various factors such as risk profile, country, industry, category, and the level of data available. It also enables us to centrally manage the issuing and receiving of supplier modern slavery risk assessment questionnaires.

In financial year 2024, we issued over 60 Supplier Assessment Questionnaires to our highest-risk suppliers. Reviews of supply chain partners is an ongoing process. To date, no instances of modern slavery have been detected through these assessments.



Our goal for financial year 2025 is to shift from a reactive due diligence approach to a proactive pre-assessment process for new suppliers, ensuring modern slavery risks are identified and managed early. Continuing the development of training for our staff remains a key priority for financial year 2025 as we strengthen our commitment to safeguarding human rights.

# MODERN SLAVERY STRATEGIC PLAN





# MODERN SLAVERY STRATEGIC PLAN

	2023	2024	2025
 <p><b>GOVERNANCE</b></p>	<ul style="list-style-type: none"> <li>Develop treatment assessment</li> <li>Review Steering Committee Charter</li> <li>Review amended Modern Slavery Act and apply revisions to strategy when available</li> </ul>	<ul style="list-style-type: none"> <li>Modern Slavery Statement submission</li> <li>Updated Modern Slavery Policy</li> <li>Updated Whistleblower Policy</li> </ul>	<ul style="list-style-type: none"> <li>Modern Slavery contract compliance roll out</li> </ul>
 <p><b>DUE DILIGENCE</b></p>	<ul style="list-style-type: none"> <li>Assess top 20 high risk suppliers through supplier questionnaire</li> <li>Review of second tier risk rating</li> </ul>	<ul style="list-style-type: none"> <li>Assess top 21 – 40 risk-rated suppliers</li> <li>Monitor supply chain updates</li> <li>Review risk rating for revenue partners</li> </ul>	<ul style="list-style-type: none"> <li>On-going assessment of suppliers based on updated risk review</li> </ul>
 <p><b>REPORTING</b></p>	<ul style="list-style-type: none"> <li>Financial year 2023 Modern Slavery Statement submission</li> <li>Finance, Audit and Risk Management Committee &amp; Board update (Nov 2023)</li> <li>ELT 6-monthly update</li> </ul>	<ul style="list-style-type: none"> <li>Financial year 2024 Modern Slavery Statement submission</li> <li>Finance, Audit and Risk Management Committee &amp; Board update (Nov 2024)</li> <li>ELT 6-monthly update</li> </ul>	<ul style="list-style-type: none"> <li>Financial year 2025 Modern Slavery Statement submission</li> <li>Finance, Audit and Risk Management Committee &amp; Board update (November 2025)</li> <li>ELT 6-monthly update</li> </ul>
 <p><b>AWARENESS</b></p>	<ul style="list-style-type: none"> <li>Explore partnership opportunities with airlines</li> </ul>	<ul style="list-style-type: none"> <li>Engage industry peers</li> </ul>	<ul style="list-style-type: none"> <li>Engage industry peers</li> <li>Deliver rolling awareness program to airport partners</li> </ul>

# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We recognise modern slavery is a significant global challenge.

Through our dedicated working group, Brisbane Airport Corporation is committed to implementing an ongoing action plan to continually refine our approach. This includes measuring the effectiveness of our actions and ensuring continuous improvement.

Building on previous reporting periods, we assess the impact of our efforts through the following actions:

- Regular reviews of our Modern Slavery Policy, Whistleblower Protection Policy, Code of Conduct, and Supplier Principles.
- Maintaining a comprehensive supply chain map to facilitate proactive supplier questionnaires and utilise alerts functionality.
- Holding quarterly meetings of our Modern Slavery Steering Committee to evaluate our progress.
- Staying informed on industry trends, processes, and strategies to address modern slavery effectively.
- Monitoring and addressing any cases reported through our Whistleblower Policy or BAC's confidential reporting service, 'BACConfidential.'
- Engaging and collaborating with our on-site partners, such as the Australian Border Force, Australian Federal Police, airlines, and security services, to review results and identify additional actions needed.

Our response to modern slavery will continue to evolve as we deepen our commitment to safeguarding human rights across our operations and supply chains.

## **Consultation with any entities the reporting entity owns or controls**

BAC does not own or control any other entities.

For more information about our business structure and strategy, our approach to sustainability and our operations, please refer to our website.



**Mr David Peever**  
BAC Board Chair

# COMPLIANCE WITH MANDATORY REPORTING CRITERIA

	MANDATORY CRITERIA	REFERENCE IN THIS STATEMENT
1	Identify the reporting entity	Page 2-3
2	Describe the reporting entity's structure, operations, and supply chain	Page 5-11
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 12-20
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 21-23
5	Describe how the reporting entity assesses the effectiveness of these actions	Page 24
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 24
7	Provide any other relevant information	N/A

