

# Modern Slavery Statement

FY2021





# INTRODUCTION

Perth Airport Pty Ltd (PAPL), the operator of Perth Airport, is a company limited by shares, incorporated and domiciled in Australia. It is a wholly owned subsidiary of Perth Airport Development Group (PADG). This is a joint statement for both entities.

This is our second statement, pursuant to section 13 of the Australian Modern Slavery Act 2018 (Cth) and sets out the actions taken by PAPL and PADG to address modern slavery risks in our business and supply chain for the financial year ending 30 June 2021.

As a socially responsible organisation, we adopt the highest professional standards and comply with all laws, regulations and codes applicable to our business. In addition, we expect those companies within our supply chain to do the same, as set out in our Supplier Code of Conduct.

We are committed to running our business ethically and responsibly. As part of our broader human rights program, this includes taking steps to continuously improve our practices to identify and address modern slavery which may occur within our business, supply chains and across our airport operations.

During FY21:

- No incidents of modern slavery were identified or reported to us.
- No whistleblower reports received in FY21 related to human rights or modern slavery.
- It was determined that we have a low risk of modern slavery in relation to our direct team members.
- Using a third-party risk intelligence software solution to analyse our existing supplier base, we identified a number of suppliers that exhibited comparatively high modern slavery risk in their operations and supply chains. These suppliers are predominately in the electronics, cleaning, security and construction industries and a supplier self-assessment questionnaire was sent to certain suppliers in these categories requesting information regarding their modern slavery processes and practices.





# ABOUT PERTH AIRPORT

Our primary function is the delivery of aviation services to the public, and the operation and maintenance of our terminals and aerodrome.

Perth Airport provides numerous economic, social and cultural benefits to Western Australians by connecting their communities to critical services. This not only strengthens cultural, family and social ties, but also supports tourism, education and leisure.

Most importantly, Perth Airport plays an essential role in the State's economic development by providing transport services for companies; supporting them to undertake their operations, service their customers and grow their businesses.

Within Australia, Perth Airport provides an access point to Western Australia from interstate locations and serves as the central transportation hub for regional destinations, such as significant mining regions and popular tourist destinations.

The airport is a vital link in the resources sector supply chain, providing connectivity for the fly-in fly-out (FIFO) workforce and for Western Australians who live in remote communities.

Internationally, Perth Airport is strategically located for access to Southeast Asia, the Middle East, Europe and Africa.

Perth Airport's contribution to tourism is significant. Approximately 93 per cent of people visiting Western Australia arrived by air and contributed more than \$4.1 billion to the Western Australian economy in 2018.

## Our Supply Chain

In FY21 we made purchases with more than 533 direct suppliers, with a large proportion being Australian suppliers. Our supply chain incorporates a wide range of products and services spanning a variety of industry sectors, broadly grouped as follows:

- Capital expenditure which represented approximately 46% of our procurement spend and includes construction activities, design consultancy and professional services.
- Contracted support services which includes security services to help keep our terminals safe and secure 24/7, cleaning, waste management & landscaping services to ensure our infrastructure is clean and hygienic, and baggage handling and aerobridge maintenance to maintain reliable operations.
- Information and communications technology (such as laptops, phones and CCTV) which are generally purchased from large multinational companies who supply us with finished products.
- Office supplies, uniforms, personal protective equipment & travel.
- Group Service Contracts (including statutory services, rent, rates, utilities, etc).



# ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

## Policies and Governance Approach

Strong governance is embedded within our business and is essential to our sustainable, long-term success, driving value creation and positive outcomes for our customers, stakeholders and shareholders.

We have a robust corporate governance framework in place, with the Board overseeing our broader Environment, Sustainability, People and Governance (ESPG) program which includes identifying, assessing and mitigating human rights issues (encompassing modern slavery).

Underpinning this framework are PAPL's suite of policies, several of which are relevant to modern slavery. This includes our Code of Conduct, our Procurement Policy and our Whistleblower Policy (which all include modern slavery and human rights provisions).

Our Supplier Code of Conduct, which is available on our website, articulates our minimum expectations to suppliers on issues such as labour practices, human rights and modern slavery. Our Supplier Code outlines our governance framework including undertaking site-based reviews of supplier operations if required, working with suppliers to remediate if operations have fallen short of expectations, continuing to evaluate performance, and invoking audit and review powers to address specific concerns.

Our standard construction, services and consultancy contracts all require suppliers to comply with the Supplier Code of Conduct and modern slavery laws.

### **Cross Functional Working Group**

Accountability for addressing modern slavery and human rights risk is cross-functional and our internal teams work together to embed our initiatives and supporting processes. In recognition of the complexity of this issue, a cross functional working group including Governance & Legal, Procurement, Projects & Development and People & Culture was created in FY20 to lead PAPL's efforts.

### **Team Members**

We directly employ 259 people, the majority in permanent roles. Our employees are engaged by either a direct contract or under collective bargaining agreements. All employees are based in Australia and recruitment is managed by an internal People & Culture (P&C) team. For specialist roles, external recruiters may be used. When this occurs, they are overseen by the P&C team.

We consider we have a low risk of modern slavery in relation to our direct team members based on location and workplace environment. This is due to our adherence to Australian labour laws and robust internal hiring procedures that reflect the values set out in our Code of Conduct and are supported by our Equal Opportunities, Diversity, Anti-Harassment and remuneration policies. We understand that vigilance is important and ongoing training with team members will continue to ensure this remains the case.

# Assessment of Modern Slavery Risk

## Identification of High-Risk Suppliers

We have tailored our risk processes to ensure that we are focussing our efforts on those areas that present an elevated risk of exposure.

We utilise FRDM, a third-party risk intelligence software solution to analyse and monitor our existing supplier base.

FRDM is a platform designed to identify and quantify the inherent risks of human rights abuses across the complete supply chain, based on the following:

- Sector and industry risks.
- Products and services risks.
- Geographic risks.
- Entity (supplier) risks.
- Labour indicators.

In addition, we have considered the continuum of conduct approach outlined in the UN Guiding Principles on Business and Human Rights. This continuum of conduct approach explains how a company may cause, contribute to, or be directly linked to modern slavery.

The results from our analysis identified a number of suppliers that exhibited comparatively high modern slavery risk in their operations and supply chains. These suppliers are predominately in the electronics, cleaning, security and construction industries and are higher risk due to the factors listed above rather than due to historical misconduct.

## Self- Assessment Questionnaire

Supplier self-assessment questionnaire containing our Supplier Code of Conduct have been sent to a selection of suppliers identified as being in the high risk/high spend categories identified above, requesting information regarding their modern slavery processes and practices.

With FRDM's assistance, we have reviewed the results of the supplier self-assessments and assessed the maturity of our supplier's approach to modern slavery.

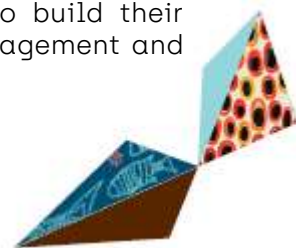
This process will continue until we have reviewed all existing and new high-risk suppliers, and periodic review across all suppliers becomes business as usual.

## Working with Suppliers

Where the FRDM risk analysis shows gaps in supplier processes to identify and address the risk of modern slavery in their operations and/or the operations of their suppliers, we take appropriate and reasonably practicable actions including working with suppliers to strengthen their internal policies and procedures and using our leverage to work with the supplier to implement solutions that meet international human rights standards.

We favour working with suppliers to resolve or substantially mitigate issues instead of ending the relationship with the supplier because of the potential adverse effects on the livelihood of the supplier's employees

Additionally, we share our expertise with suppliers [who require support] to build their capability to meet international standards through periodic meetings for engagement and discussion on modern slavery, and through provision of guidance and tools.



Following a high-level overview and assessment of our supply chains, the following parts of PAPL's supply chain were deemed to exhibit comparatively higher modern slavery risk:



## **ELECTRONICS**

The information and communications technology sector is recognised globally as being a high risk industry.

Manufacturing often occurs in locations with minimal regulation and oversight, where workers have limited resources and methods for resolving grievances.

A significant number of workers in electronics supply chains are migrant workers who are particularly vulnerable to exploitation.

In addition to the operational issues in the sector, there are raw material challenges with significant risks of conflict minerals and child labour in the production of critical components such as cobalt.

Accordingly, there is a risk that we could contribute or be directly linked to modern slavery practices through the purchase of electronic devices, including computers and mobile phones.



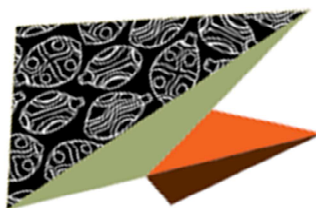
## **CLEANING AND SECURITY**

Services such as cleaning, property maintenance and security are essential to our operations.

These services often exist in a price competitive market, sometimes relying on low-skilled migrant labour for viability.

This, in combination with the multiple tiers of contracting, creates preconditions for vulnerable workers to be exposed to a range of modern slavery practices.

To mitigate the risk of contributing to modern slavery practices we conduct due diligence and ensure suitable contractual arrangements are in place. We also ensure that we pay an appropriate fee that allows contractors to pay their workers fairly.



## **CONSTRUCTION**

The construction industry commonly comprises long supply chains and low-skilled, low-paid manual work which can create a risk for modern slavery.

The construction of our infrastructure occurs in Australia where the modern slavery risks are lower than in other countries and we mitigate the risk of contributing to modern slavery through due diligence and contractual arrangements. Further, our procurement process ensures a weighted evaluation criterion is used, with price being only one of several criteria for decision making. Other criteria may include business integrity, technical capability, sustainability and health and safety performance and standards.

In addition, the supply chain comprises a significant number of raw materials and components that go into a project. There is a risk of being directly linked to modern slavery through the sourcing of raw materials and we are working with suppliers to understand how they mitigate this risk.

# Remediation

Remediation in a human rights context is about 'putting things right' for the person(s) experiencing a human rights breach. As the circumstances surrounding a modern slavery incident are likely to be unique, a response will be determined on a case-by-case basis and may involve a business process change, an education campaign or corrective action.

We have established reporting procedures and mechanisms where team members and third parties can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery or human trafficking.

Team Members can report to their manager, or if they wish to remain anonymous, team members and third parties are able to report through our independently operated Whistleblower system, via phone, email or an online portal.

Investigations will be undertaken with care and where substantiated, we will report to our Board and take appropriate action.

# Human Trafficking

We recognise that Perth Airport is a major international gateway into Australia and a potential entry point for trafficked persons. Both the Australian Federal Police and the Department of Home Affairs have significant representation on Airport to facilitate oversight of this human trafficking risk.

# TRAINING

Training and awareness are key controls in addressing the risk of modern slavery and human trafficking. We recognise the need to build the capability of our team members, particularly our procurement practitioners/project managers and our front-line team-members, to identify potential red flags of modern slavery and human trafficking and the actions required to respond appropriately.

In FY20, we developed a training module to help build their awareness of global modern slavery and human trafficking so team members are in a better position to understand, identify and report incidents. Almost all team members completed this training during this reporting period and it is mandatory for new team members.



# EFFECTIVENESS

In the short-term we will measure the effectiveness of our actions by reviewing and assessing:

- the number of responses from supplier questionnaires in relation to modern slavery and labour hire practices;
- the number and types of actions taken to work with suppliers to improve their capacity to respond to modern slavery risks and whether their performance improves; and
- employee completion rate of training module.

# CONSULTATION

PAPL is the operator of Perth Airport and holds all employee and supply chain relationships. Therefore, the issues discussed in this statement apply for the main part, solely to PAPL. PADG is the holding company of PAPL. As both entities share the same directors, consultation was not required.

# CONTINUOUS IMPROVEMENT

We are committed to a program of continuous improvement to ensure that our efforts to identify, assess and address modern slavery are effective. A range of additional actions have commenced, or are planned, and will be reported in subsequent statements.

These include the below activities:

- Ongoing review and enhancement of modern slavery framework, risk management processes and associated policies.
- Completion of supplier assessments for high risk suppliers.
- Providing meaningful feedback to all suppliers who complete our supplier assessment.
- Reviewing and assessing the results of the supplier self-assessment project.
- Introduction of auditing program for high-risk suppliers.
- Continued and proactive supplier engagement relating to modern slavery practices thereby improving overall transparency relating to labour and human rights practices.
- Further collaboration with industry with intention to contribute to more ethical and sustainable practices with the industries in which we operate.
- Development of additional ways to measure effectiveness.



This statement was approved by the Board of Perth Airport Pty Ltd  
Signed



Lyndon Rowe  
Acting Chairman  
November 2021

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