

# Modern Slavery Statement

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2023



## **ACKNOWLEDGEMENT OF COUNTRY**

Boorloo Worlak Kornt kaadatj Wadjak moort  
Noongar boodja-k wer baalabang kalyakoorl  
noyinand Noongar boodja-k. Ngalak kaadatj  
Noongar Birdiya koora-koora yeyi wer boordakan.

Perth Airport acknowledges the Whadjuk Noongar people as the Traditional Custodians of this region and respects their ongoing connection to this land. We pay our respects to Elders past, present and emerging.

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# Introduction

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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 statement is our fourth annual update, pursuant to section 13 of the Australian *Modern Slavery Act 2018* (Cth) (Act) 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 2023.

As a socially responsible organisation, we adopt the highest professional standards and comply with all laws, regulations and codes applicable to our business. We aspire to make a meaningful economic, social and environmental contribution to the communities that we serve while ensuring intergenerational equity. We recognise that to meet this goal we must uphold the human rights of our team members, our suppliers, contractors and the travelling public who utilise our services. 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 FY23:

- No incidents of modern slavery were identified or reported to us, however we acknowledge the need to remain vigilant in addressing modern slavery risks.
- No whistleblower reports received in FY23 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 a selection of suppliers in these categories requesting information regarding their modern slavery processes and practices.



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# About Perth Airport

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Perth Airport is Australia's western hub providing the people of Western Australia ("WA") with a critical link to the rest of Australia and the world.

It operates 24 hours a day, seven days a week, and occupies a position as one of the most important infrastructure assets in Western Australia.

As the fourth-largest domestic and international airport in Australia by passenger volume, Perth Airport is serviced by more than 26 international, intrastate and interstate airline partners that operate to more than 94 destinations.

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

Perth Airport contributed more than A\$3.5bn to the Western Australian economy and generated nearly 17,000 direct and indirect jobs in 2018 and this is expected to grow to A\$9bn and approximately 37,000 jobs by 2040.

Perth Airport is majority owned by superannuation / pension and infrastructure funds (70%), while the remaining 30% is owned by Australia's sovereign wealth fund (Future Fund). This ensures a portion of the business profits are returned to ordinary Australians through investment in their super fund or via direct community investment.

## OUR SUPPLY CHAIN

In FY23 we made purchases with more than 629 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 42% 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 our governance framework are PAPL's suite of policies, several of which are relevant to modern slavery. This includes our ESG Framework, Code of Conduct, our Procurement Policy, and our Whistleblower Policy, all of which include provisions related to modern slavery and human rights.

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 Accountability**

Addressing modern slavery and human rights risks is a collective responsibility within PAPL. Various internal teams, including Governance, Risk & Legal, Procurement, Projects & Development, and People & Culture, collaborate closely to integrate our initiatives and underpinning processes.

## **Team Members**

We directly employ 336 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 the strong regulator environment in Australia, 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**

Due diligence underpins our management of modern slavery risks and assists us in ensuring the ongoing alignment of our processes with the United Nations Guiding Principles on Business and Human Rights.

Our due diligence is an ongoing and iterative process of identification, prevention and mitigation that considers both actual and potential adverse human rights impacts through our activities and our business relationships.

## **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.

Following a high-level overview and assessment of our supply chains, the following parts of PAPT'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

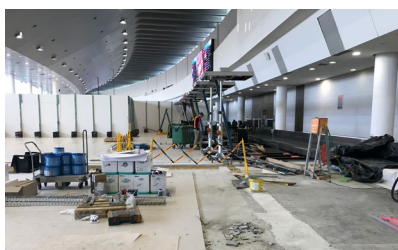
Services such as cleaning, property maintenance and security are essential to our operations.

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.

We recently completed a deep dive 3rd party audit into our security contractor which did not raise any concerns.



### 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.



### Solar Panels

One of the emerging risks in our supply chain pertains to the procurement of solar panels. Central to our ESG Strategy, the generation of green energy plays a pivotal role in reaching our sustainability milestones. Our goal is to achieve Net Zero Emissions for Scope 1 and Scope 2 Emissions by 2040.

However, achieving this environmental target requires us to consider the potential for modern slavery conditions associated with solar panel manufacturing.

Specifically, there are concerns regarding the sourcing of raw materials like Polysilicon.

As of this report's submission, we are in the preliminary stages of planning a solar farm. Part of the procurement process will involve gaining a deeper understanding of the solar supply chain beyond our first tier contractor.



### Self- Assessment Questionnaire

Supplier self-assessment questionnaires (SAQ) have been sent to a selection of suppliers identified as being in the high to medium risk categories, requesting information regarding their modern slavery processes and practices.

With FRDM's assistance, we have conducted a desktop audit, reviewing the results of the SAQs and associated documentation to assess the maturity of our suppliers' approach to modern slavery.

During the year we undertook desk-top audits of 30 suppliers.

### Deep Dive Audit

In the financial year 2023, PAPL made a decision to commission PwC for a thorough audit of our security service provider. This decision was prompted by the critical nature of security services in our operations and the particular vulnerabilities associated with the sector.

The security provider in question has been a vital part of PAPL's operational safety for several years, offering personnel and technology resources to secure our premises.

PwC's approach to the audit included a number of investigative techniques ranging from desktop audits to an examination of payroll processes. A sample of the security provider's employees was selected for interviews, including both management and non-management staff, to gauge a broad perspective on the provider's practices.

PwC's interviews covered topics including labour practices, work standards, awareness of policies and grievance mechanisms, payroll verification, and the supplier's ability to respond to modern slavery risks.

It was confirmed that the supplier not only had established management practices to identify and respond to modern slavery risks but also had documentation in place that aligned with PAPL's expectations.

An identified area for potential improvement is the enhancement of modern slavery awareness among frontline staff. This will be addressed in FY24 by organising for the Australian Federal Police to provide specialised training to frontline staff. This training is intended to empower airport workers to identify and support individuals at risk of modern slavery and human trafficking.

The PwC audit has provided PAPL with assurance regarding the security provider's practices while also charting a course for continuous improvement, reinforcing our commitment to ethical and socially responsible operations.

### Working with Suppliers

Generally, we find that suppliers who are subject to the provisions of the Act have mature approaches in place to identify and mitigate the risks of modern slavery. However, we recognise that the Act does not require small to medium companies to complete an annual modern slavery report, nor do they necessarily have the resources to invest in the kind of compliance processes, systems, and people which a larger organisation might. These companies generally have few formal controls, policies or commitments to modern slavery and are less likely to be able to identify its presence or address the risk of modern slavery in their operations and/or the operations of their suppliers.

In these cases, we take appropriate and reasonably practicable actions including working with suppliers to strengthen their internal policies and procedures and by providing actionable and practical feedback and direction to resources. We continue to monitor and assist these suppliers until their maturity improves.

We favour working with suppliers to resolve or substantially mitigate issues instead of ending the relationship with the supplier because it could adversely affect the livelihoods of the employees.



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## REMEDIATION

Remediation in a human rights context is about 'putting things right' for the individuals 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 crucial in addressing the risks 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.

We have 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

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We measure the effectiveness of our actions by:

- reviewing the number of responses from supplier questionnaires in relation to modern slavery and labour hire practices;
- assessing 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;
- ensuring our supply chain remains under constant review by updating data provided to FRDM;
- monitoring and actioning in a timely manner any cases reported through our Whistleblowing Policy and through our confidential reporting service;
- through employee completion rate of training module; and
- by reviewing our modern slavery mitigations against best practice.

# Consultation

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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

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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, where required.
- Implement the auditing program for comparatively high-risk suppliers with a construction contractor being the focus of our next independent deep-dive audit.
- Continued and proactive supplier engagement relating to modern slavery practices thereby improving overall transparency relating to labour and human rights practices.
- Planning has commenced for the Australian Federal Police to train front-line staff and security personnel on the important role airport workers can play in identifying people at risk of modern slavery and human trafficking as they pass through the terminals.





**THIS STATEMENT WAS APPROVED BY  
THE BOARD OF PERTH AIRPORT PTY LTD.**



**Robert Cole**  
Chairman  
Perth Airport

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Level 2, 2 George Wiencke Drive  
Perth Airport, WA 6105  
PO Box 6, Cloverdale WA 6985



[perthairport.com.au](http://perthairport.com.au)