



Queensland
Airports^{LIMITED}

Modern Slavery Statement

2024 Financial Year

Acknowledgement of Country

Queensland Airports Limited acknowledges the Traditional Custodians of the cultural landscapes on which our airports operate. We recognise their continued connection to the lands, waterways, seas, and skies and pay our respect to their Elders past, present and emerging.

Key Actions During 2024

- Updated and reissued our mandatory Modern Slavery training provided to all employees.
- Reviewed and amended human rights clauses within critical contracts, Security and Cleaning.
- Undertook a Governance Audit including key human rights policies, Code of Conduct, Fraud and Corruption Control, Risk Management, Modern Slavery and Whistleblower.
- Established a procurement function within the organisation.
- Established an Executive sustainability, strategy and people function within the organisation.

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Joint Message Chair and CEO

Queensland Airports Limited (QAL) is strongly opposed to modern slavery in all its forms. We are committed to respecting and supporting fundamental human rights and building relationships with businesses and stakeholders who share that commitment.

QAL has developed a strategic understanding of the risk of modern slavery relating to our operations and supply chain and the risks identified to date are outlined in this statement. However, we acknowledge that further risk management activities are required to establish a deeper understanding of our modern slavery risk and enable further improvements in our actions to be taken.

During 2024, we did not detect or identify any instances of modern slavery in our operations or supply chain.

We have established the foundations upon which to develop a mature and effective approach to managing modern slavery risks on an ongoing basis. This commenced with our Modern Slavery Improvement Plan (FY21-25), our Modern Slavery Framework and our various governance practices relating to the management of risks and assurance of our controls relating to modern slavery risk e.g. conditions in contracts, due diligence and assurance within the procurement of services from existing and prospective services' providers.

We recognise that as an airport group, our infrastructure may be used as a gateway for human trafficking, and we work closely with the relevant agencies to mitigate this risk.

This statement complies with the requirements of the Modern Slavery Act 2018 (the Act) and was developed by QAL's Legal and Governance Department, was endorsed by our Executive and Risk and Audit Committee and approved by our Board of Directors. It is signed by the Chair of the Board, Ann Sherry AO, and Chief Executive Officer, Amelia Evans in accordance with section 14(2)(d)(iii) of the Act.



Ann Sherry AO
Chair
Queensland Airports Limited



Amelia Evans
Chief Executive Officer
Queensland Airports Limited

Our Company

About Us

Queensland Airports Limited (QAL) is an accomplished airport operator that owns and operates Gold Coast, Townsville, Mount Isa and Longreach airports. We are committed to delivering for our shareholders and the communities in which we operate, recognising the important economic and social benefits we offer to the regions we support.

QAL's shareholders include Australian superannuation and investment funds as well as other Australian owners.

QAL is a privately-owned company and its shareholders include superannuation and investment funds:



Our Structure

Queensland Airports Limited (ACN 104 121 824), QAL Finance Pty Ltd (ACN 113 941 512), Gold Coast Airport Pty Ltd (ACN 077 200 821), Townsville Airport Pty Ltd (ACN 081 257 490), Mount Isa Airport Pty Ltd (ACN 081 257 552), Longreach Airport Pty Ltd (ACN 138 820 854), Australian Airports Pty Ltd (ACN 075 315 623), Piggabeen Land Company Pty Ltd (ACN 073 959 618), QAL Services Pty Ltd (ACN 113 518 639), QAL Management Services Pty Ltd (ACN 133 656 872), QAL Property Pty Ltd (ACN 096 916 193), QAL Property No. 2 Pty Ltd (ACN 136 806 589).

- Gardior as trustee for The Infrastructure Fund **(35.77%)**
- Perron Investments Pty Ltd **(24.62%)**
- STC Funds Nominee as trustee for the Project Cricket State Super Unit Trust **(17.35%)**
- State Street Australia Ltd as custodian for Australian Retirement Trust **(16.89%)**
- QAL Investments No. 2 Pty Ltd as trustee for QAL Investments Trust **(4.24%)**
- Allan Moss **(0.82%)**
- Lipno Holdings Pty Ltd **(0.31%)**

In mid-2023, some of the QAL shareholders holding 74.25% of QAL's securities announced that they were selling their interests in QAL. That sale process (Project Wallaby) has continued since then and is expected to be completed in late 2024. Post sale completion, we expect to be able to continue to build upon the work done to date in relation to mitigating modern slavery risk within our operations and in fact, communities.

Our Airports



5.6m Passengers in FY24
89% Domestic
11% International



1.6m Passengers in FY24
100% Domestic



0.23m Passengers in FY24
100% Domestic



0.03m Passengers in FY24
100% Domestic

Our Vision, Purpose, and Values



Governance

QAL has a well-developed Governance Framework consisting of structure, reporting lines, systems, and processes to ensure that our internal governance standards are followed, our objectives are achieved, risks are managed, and regulatory requirements met. QAL utilises strategic level internal controls which apply across all airports, with operational level internal controls, as appropriate and required, for each airport.

The Framework utilises a three lines of defence model which supports effective governance throughout each tier of the organisation from senior management, through to the Board and Shareholders. The following internal controls apply to the management of modern slavery risk:

- ➔ Code of Conduct
- ➔ Modern Slavery Framework
- ➔ Fraud and Corruption Control Framework
- ➔ Whistleblower Framework
- ➔ Ongoing Stakeholder Engagement

Management of modern slavery risk is coordinated by the Legal and Governance and Finance Departments jointly with actions undertaken with other Departments e.g. operations and authorities execution of airport operations strategies. Our activities come under the oversight of the Executive Committee, and in turn, escalated to the Risk and Audit Committee and Board as required and appropriate. With the introduction of the QAL procurement function, QAL will be better able to centralise management of modern slavery within QAL's major procurement activities with other departments providing support and execution of our modern slavery strategies as required.

Consultation

QAL utilises established structure and reporting lines to enable effective consultation and collaboration in respect of modern slavery risks and activities across all QAL entities. This process is supported by members of the Legal and Governance, Finance, Operations and Projects Teams enabling effective cross business representation, consultation, and collaboration. The consultation process includes risk identification and assessment, determining actions and initiatives and ongoing performance monitoring and reporting.

QAL also engages externally with airport stakeholders including Home Affairs, Australian Federal Police, Queensland Police and New South Wales Police. Working together, identified risks and




controls, strategies and importantly, learnings are shared and in this way, our communities benefit from our collective approach in combatting modern slavery.


Our Operations

As an airport operator, QAL derives the majority of its revenue from airport and airport-related operations, with further revenue derived from property holdings. For further detail please see the [Queensland Airports Limited Annual Report](#).


Revenue Streams




Aviation operations with revenue derived from aeronautical services charges for Regular Passenger Transport, General Aviation and Freight.




Portfolio of leases for terminal food and beverage concessions.




Car park and ground transport servicing access to and from the airport.



Portfolio of leases for terminal retail concessions.



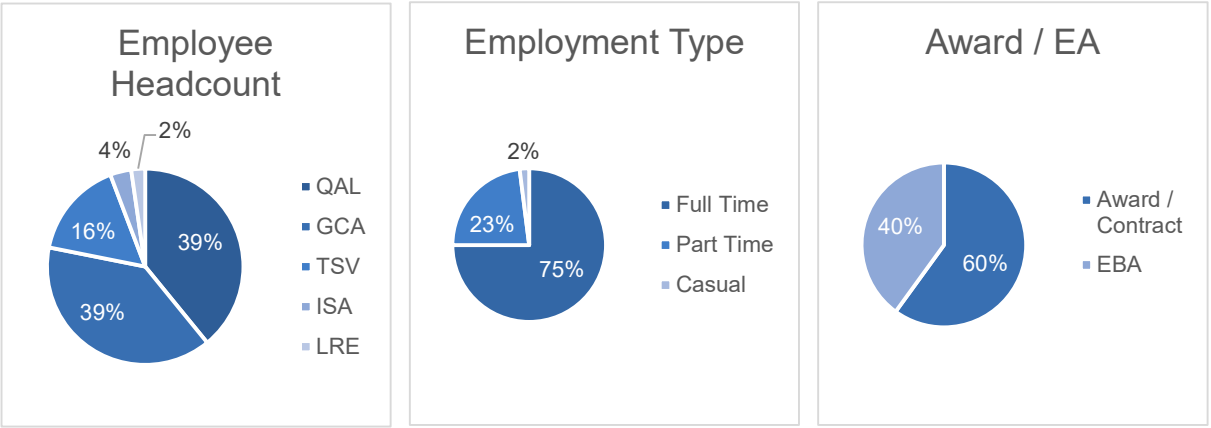
Property portfolio including university, hotel, medical, aviation, freight, car rental, retail, and hospitality.



Portfolio of leases for terminal service providers.

Workforce





QAL’s workforce is predominately employed under a Modern Award contract or Enterprise Bargaining Agreement (EA) on a full-time or part-time basis. QAL also outsources a significant volume of services to third parties under contracts and agreements due to the nature and extent of its operations. In addition, QAL engages third parties under contract to provide security screening, cleaning, and car park management services.











Our Supply Chains

Products and Services

QAL's supply chain largely consists of goods and services provided to support airport operations.

Products			
	Technology, including computer hardware and mobile phones.		Major capital projects under design and construct contracts.
	Software, including software as a service.		Promotional goods and materials (not for re-sale).
	Assets and infrastructure and related replacement parts.		Uniforms and PPE (not for re-sale)

Services			
	Aviation security screening services.		Car park management.
	Cleaning services for terminal and administrative buildings.		Major capital projects under design and construct contracts.
	Curb-side concierge.		Technology support services.
	Trades and trade related services.		Consultancy services.

Sectors and Services

Where possible, QAL usually sources products and services from Australian based companies. However, some products are manufactured outside Australia and fall within higher risk sectors.

Country of Origin	Products and Services
Southeast Asia	Technology hardware, promotional goods, uniforms and PPE, assets, and infrastructure.
India	IT Support and services.

QAL, to the extent that it is possible, reviews overseas' product and service companies' Modern Slavery practices during the procurement phase of obtaining new products or services to identify any at risk businesses. In some cases, this is difficult, however, in undertaking due diligence of the supplier, we are usually able to gauge whether they are a reputable supplier and appropriate trading partner. The new procurement function will enable us to make further improvements in this aspect of our business activities.

Modern Slavery Risk

Risk Assessment

Risk Management activities are conducted in accordance with QAL's Risk Management Framework (aligned with ISO 31000:2018), with specific application to the external and internal modern slavery context and factors.

QAL has undertaken a strategic risk assessment in relation to modern slavery risks and has reviewed the risk assessment during the reporting period. In addition to this, QAL assesses any direct operational risks of modern slavery during our usual due diligence processes and approvals. Our reviews consider geographic, sector and product risks in addition to assessing the entity supplying the product or service.

QAL acknowledges that visibility and understanding of modern slavery risk is developing and improving. Where appropriate, QAL currently utilises open-source data, including the Walk Free Global Slavery Index to assist with assessing the risk from modern slavery. QAL also engages with external subject matter experts to conduct a deeper dive into the risk areas identified in our risk assessments if required but this has not been necessary during this period. QAL will continue to develop a clearer and deeper understanding of the materiality of any potential vulnerabilities or risks and just as importantly, the manner in which QAL potentially causes, contributes or is in some way is unknowingly linked to modern slavery.

Operational Risk

QAL did not detect any instances of modern slavery directly linked to our operations in the reporting period, however, we continue to monitor the following areas which present a heightened risk.



Aviation security screening services are provided by a third party under contract (**219 workers**) and may have presented a heightened risk due to the sector risk. QAL is satisfied that the risk is well controlled, with the appointment of a new contractor and assurance gained of their good management of this risk during the procurement phase.



Cleaning services are provided under contract by a number of third parties who service various QAL sites (**70 workers**) and presents a heightened risk due to the sector risk. QAL is satisfied that the risk is controlled, with recent assurance activities indicating there are no sub-contracted employees and/or employees without appropriate visas and that employee payments are made in accordance with the relevant award.

On-Airport Risk

QAL acknowledges that there is an indirect risk (low) of modern slavery from third party operations and leaseholders.



Workers are engaged under contract to third parties operating on QAL properties. This includes airline baggage handlers, cleaners, and caterers. There is a potential contingent workforce risk associated with these sectors. QAL will continue to engage with third parties to promote and encourage practices to reduce the risk of modern slavery. QAL gains assurance by contracting only with sophisticated and reputable third parties.



QAL leases premises to a broad range of businesses including food and beverage, catering, retail, general aviation, tertiary education, fuel supply, transport, childcare and medical services. The indirect risk of modern slavery is considered low, however QAL will continue to engage with tenants to promote and encourage practices to reduce the risk of modern slavery. QAL gains assurance by contracting only with sophisticated and reputable third parties.

Supply Chain Risk

QAL continues to develop a greater understanding of the risk of modern slavery in its supply chain. Whilst the strategic assessment of our supply chain has indicated potential vulnerabilities in regard to technology and promotional products sourced from foreign countries, as is the case in most industries, further supply chain mapping and assessment of the risk will be undertaken to enable the actual risk to be fully understood and controlled more effectively. Through our procurement and assurance practices, risk associated with modern slavery in our supply chain is considered low.



QAL utilises an extensive range of technology (hardware and software) to conduct and support operations. Technology is generally sourced from established providers, however QAL acknowledges there is a heightened risk in relation to the materials used to manufacture some items and a potential labour risk depending upon the geographic origin of an item.



QAL has previously engaged in a number of major construction projects. Each project involved the engagement of a tier one or two construction contractor, generally under a design and construct contract. Smaller capital projects have been undertaken during the period involving smaller construction companies. QAL acknowledges that a heightened supply chain risk exists with materials or construction elements potentially being sourced from geographic locations where the modern slavery index is high. However, this risk is mitigated by the use of reputable local companies and strong engagement with them and sharing our concerns and expectations regarding modern slavery risk.



QAL purchases equipment, infrastructure, and components for use in airport operations. Purchases are in most cases, from recognised Australian based companies with a low direct modern slavery risk, however, QAL acknowledges that there may be risks of modern slavery in the supply chain of goods which are purchased.



QAL purchases promotional goods and materials used to promote airport activities. Purchases are in most cases from Australian based companies; however, some items are manufactured in Southeast Asia with a heightened modern slavery supply chain risk.



QAL purchases uniform items and personal protective equipment for use in airport operations. Purchases are in most cases, from Australian based companies; however, some items are manufactured in Southeast Asia with a heightened modern slavery supply chain risk.



QAL engages Australian based companies to provide IT Support services in relation to some software systems. The Australian based companies on occasion, utilise 'overseas' subject matter experts to provide certain IT support services. QAL has been assured that the terms and conditions by which the foreign subject matter experts are contracted by those companies are consistent with relevant markets from where the services are provided.

Gateway Risk

QAL airports service domestic and international markets and as a consequence, may serve as a gateway for a number of classes of modern slavery including servitude, forced labour, debt bondage, forced marriage and human trafficking. Due to its location and reputation as a holiday destination, Gold Coast Airport presents a heightened gateway risk for human trafficking. The risk is, however considered lower with international arrivals being lower in the current reporting period.

Human Trafficking Through Airports



Globalisation and the increase in movement between countries via air travel has also increased the illegal movement of people. Human Trafficking is the movement of vulnerable persons by threat, force of coercion to control and exploit that person. Airports may be gateways for a range of human trafficking activities including sexual exploitation, debt bondage and servitude or forced begging. The aviation industry is able to mitigate the risk of human trafficking by raising awareness amongst employees and stakeholders to detect suspect activity, encourage reporting to relevant agencies on the ground, creating awareness for victims and active collaboration with relevant agencies.

Controlling the Risk

During the reporting period, QAL has continued to take action to manage the risk of modern slavery in accordance with our Modern Slavery Improvement Plan. We will look to continue to improve our performance in this important area.

Modern Slavery Strategies

Our Modern Slavery Strategies are focused on ongoing real and sustainable improvements. The strategies and actions are risk based and have been developed through consultation with key stakeholders.

A key element of the improvement plan is integration of modern slavery considerations into our business as usual activities as well as our current policies and practices so as to ensure effective utilisation. An example of this approach was the redrafting of our Airport Conditions of Use which includes requirements for air operators in relation to reporting and management of modern slavery

risks as a condition of use for QAL's airports. We have taken a similar approach in updating our standard Purchase Order's terms and conditions and various contract templates.

Modern Slavery Framework

QAL's Modern Slavery Framework comprises established protocols and procedures to be applied to the management of the risk of modern slavery arising directly and indirectly from QAL operations. The framework includes:

- Modern Slavery Policy.
- Risk Assessments.
- Risk Treatments and Mitigation Initiatives.
- Collaboration.
- Training and Awareness.
- Monitoring and Review.

Ongoing Focus

QAL's ongoing approach to managing modern slavery risk involves:

- Assessing modern slavery risks particularly in relation to procurement, projects, and airport operations.
- Facilitating and monitoring implementation of modern slavery risk treatments.
- Identifying and facilitating opportunities to collaborate with agencies, business partners and/or non-government organisations to mitigate modern slavery risks.
- Monitoring and reviewing effectiveness of treatments and actions.
- Promoting awareness and capability development in relation to modern slavery.
- Monitoring and reviewing effectiveness of our Modern Slavery Framework.

Key Person Training

QAL employees undertake Modern Slavery Awareness Training. We are currently investigating advanced training for key roles involved in activities with a higher risk of encountering activities that may be associated with modern slavery.

Contract Terms & Conditions

QAL updates its suite of precedent contracts from time to time and in doing so, ensures that they include terms that impose obligations on suppliers to address modern slavery compliance requirements, assurance and notifications, and support QAL in completion of due diligence activities. These clauses are included in new and updated goods and services contracts. Furthermore, they are included in QAL's lease and licence agreements to provide a level of assurance in respect of tenants' on-airport activities.

Access Cards

QAL issues access identification cards for all stakeholders requiring access to the airport. Issuance of the access card is subject to several conditions, including verification of identity and

right to work status. The checks undertaken provide assurance and mitigate risk of modern slavery relating to the individuals involved.

Minimum Procurement Standards

QAL continues to improve its performance in relation to Environment, Social & Governance (ESG) including the development of a comprehensive ESG strategy. An important element of our ESG strategy will be embedding minimum human rights standards into our procurement practices. This will include:

- No direct modern slavery.
- No child labour.
- No forced/bonded labour.
- Compliance with local labour laws.
- Compliance with local awards.
- Records of wages, hours, and benefits.
- No discrimination, harassment, or abuse.
- No violence or intimidation.
- No deceptive recruitment.
- Freedom of association.
- Proactively manage the indirect modern slavery risk in their Supply Chain.

Key Activities FY24



Updated and reissued our mandatory Modern Slavery training provided to all employees.



Reviewed and amended human rights clauses within critical contracts, Security and Cleaning.



Undertook a Governance Audit on key human rights policies, Code of Conduct, Fraud and Corruption Control, Risk Management, Modern Slavery, Whistleblower.



Established a procurement function within the organisation.

Due Diligence and Assurance

Due Diligence

QAL has identified effective due diligence as a central element of our Modern Slavery strategies. During the reporting period due diligence activities were limited to the use of open-source information, including review of Modern Slavery Statements and published information, and self-reporting from suppliers through questionnaire responses. Deeper dive due diligence activities are planned as part of our ESG initiatives within our new QAL Strategic Plan for FY2023 - 2027.

Assurance

QAL continues to develop and embed appropriate assurance requirements for our suppliers. This includes the provision of details of their practices to QAL in tenders, completion of self-assessments and provision of assurance certificates confirming compliance with the principles of the Act.

QAL also works collaboratively with identified high risk suppliers to gain assurance that risks arising from modern slavery are being managed and that actions or remedies are effective.

QAL intends to conduct a program of audits in relation to suppliers who employ contingent labour, major contracts and contracts which have been identified to present a heightened risk of modern slavery. This program will be established through collaboration with our business partners. Business partners will be encouraged to rectify identified non-conformance issues within a time frame commensurate with the risk associated with the non-conformance.

Grievance Reporting

QAL has a well-established Whistleblower Framework which is supported by a Whistleblower Hotline (FairCall). The FairCall service is provided for QAL under contract with KPMG. The QAL Whistleblower Framework provides a rigorous structure and clear mechanisms to enable matters to be reported, managed, investigated, and resolved in an effective manner which maintains privacy and confidentiality.

QAL actively promotes the existence of the Hotline to ensure that employees and stakeholders are aware the FairCall Hotline may be utilised to report inappropriate behaviour including modern slavery related matters.

Control Effectiveness

In accordance with the QAL Risk Management Framework, the effectiveness of risk controls is monitored on an ongoing basis and reviewed periodically, usually quarterly. Control effectiveness is also reviewed periodically, including when an incident occurs to determine whether a control has been effective, implemented correctly or if there is a control deficiency. Where corrective action is required, corrective action will be taken in a timeframe commensurate with the risk presented by the deficiency. Control effectiveness in respect of all identified risks is an ongoing and dynamic process including those risks associated with modern slavery.

Remedial Action

QAL has not been required to seek and/or implement remedial action in relation to modern slavery during the reporting period. QAL will investigate all grievances or detected instances of modern slavery in accordance with the Modern Slavery Policy and determine the root cause and contributing factors. QAL will ensure corrective and remedial actions are developed to directly address the root cause and contributing factors to ensure that any further risk of modern slavery is reduced so far as reasonably practicable and appropriate remedies are implemented.

Where required, QAL will work collaboratively through this process with suppliers or service providers to ensure meaningful and sustainable action is taken.

Performance Assurance

QAL assures the performance of its Modern Slavery initiatives by:

- Training.
- Procurement and Contract Performance Monitoring.
- Supplier and Contractor Assurances and Engagement.
- Audits (as required).
- Grievances.
- Whistleblower Promotion.
- Corrective Actions (as required).
- Actioning Detected Modern Slavery Issues.
- Agency Engagement.

QAL's performance is monitored, and any identified risks reported to the Risk and Audit Committee and where appropriate, the Board.

Continual Improvement

The Modern Slavery Framework, including risk management and controls, is subject to ongoing review and improvement. This process of continual improvement for modern slavery risk is championed by Legal and Governance and undertaken by the various QAL departments. This process includes an annual review and non-scheduled reviews when regulatory amendments occur, when there is a regulatory action, upon introduction of new practices, when the external context changes or due to audit findings.

