

AUSTRALIA PACIFIC AIRPORTS CORPORATION LIMITED MODERN SLAVERY STATEMENT

This Modern Slavery Statement is issued pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)* for the Financial Year ending 30 June 2020, in respect of **Australia Pacific Airports Corporation Limited 89 069 775 266 (“APAC”)** and each relevant entity which it controls (“APAC Group”), being:

Australia Pacific Airports (Melbourne) Pty Ltd ABN 62 076 999 114 (“APAM”)

Australia Pacific Airports (Launceston) Pty Ltd ABN 79 081 578 903 (“APAL”)

APAC (Holdings No. 2) Pty Ltd ABN 78 136 451 959 (“AH2”)

APAC (Holdings) Pty Ltd ABN 60 081 578 887 (“AH”)

Who we are

APAM (in respect of Melbourne Airport) and APAL (in respect of Launceston Airport) are the airport lessee companies under a long-term lease with the Commonwealth of Australia. These leases grant each of these entities the right to manage Melbourne Airport (located in Tullamarine, Victoria) and Launceston Airport (located in Launceston, Tasmania).

AH2 and AH are the immediate owners of each of APAM and APAL respectively and Launceston City Council has a 10% interest in APAL. APAC is the ultimate holding company of the corporate group.

APAC is a wholly owned Australian, privately held corporation owned by institutional investors which contribute to the retirement savings of thousands of Australians.

References below to “APAC” include the APAC Group as a whole.

What we do

As part of our principal functions in managing Melbourne Airport and Launceston Airport, APAC manages the aviation operations, leasing (including retail leasing) operations, parking and ground transportation operations and the development and construction of infrastructure at both Melbourne Airport and Launceston Airport.

Our supply chain

APAC has a global supply chain comprised of approximately 2,000 suppliers. The majority of suppliers directly contracted by APAC are located in Australia. Other countries where suppliers directly contracted by APAC are located include the United States of America, European Union, India, Singapore and the United Kingdom. These suppliers operate in a diverse range of industries, primarily service based and include technology support, consultancy, facilities management, construction and engineering, office supplies, cleaning, waste management and marketing. Suppliers are generally engaged as independent

contractors and may be contracted on a long or short-term basis depending on the nature of the services.

APAC is committed to operating ethically, fairly, in compliance with all relevant laws and in a socially responsible manner consistent with the expectations of our local communities. We also expect suppliers within our supply chain to act in the same way.

APAC assesses the risk of modern slavery in our supply chain to be low, due largely to the fact that the majority of suppliers that we directly contract with are located in Australia. Notwithstanding this, APAC recognises that there may be instances in which we are indirectly exposed to modern slavery practices in our supply chains. Specifically, the cleaning services, office supplies, IT services and construction industries are sectors that APAC considers more likely to be at risk of modern slavery practices occurring further down the supply chain, as follows:

- risk that raw materials used in office teas, coffees and foods are not fair trade, including that they may be obtained contrary to fair labour practices
- risk of labour exploitation in the production of company uniforms (where used)
- risk of unpaid or underpaid labour and excessive hours, including in relation to foreign workers and off-shoring of any component of services, in connection with subcontracting in the construction, IT and/or cleaning sectors

What is APAC doing to minimise modern slavery risks in our supply chain?

APAC has implemented measures to try to mitigate the risk of modern slavery occurring in our supply chain, as set out below.

Supplier Code of Conduct: suppliers wishing to contract with APAC must read and agree to the terms of APAC's Supplier Code of Conduct as a condition of providing APAC with services. This process is incorporated in APAC's Procurement Policy and is integrated in our procurement process. This code of conduct requires suppliers to agree to a number of integral requirements, including rejecting all forms of child labour and forced labour and ensuring fair remuneration and work conditions for all team members.

APAC Code of Conduct: this is an internal code of conduct. It is mandatory that APAC team members read and sign their acknowledgment of and agreement to this code of conduct. A breach of the code of conduct is viewed as a serious matter that must be addressed and may lead to disciplinary action, including dismissal where appropriate. The code of conduct mandates that only suppliers which share APAC's commitment to lawful and ethical practices are engaged and that any doubts as to this are immediately reported to a manager.

Speak Up (Whistleblower) Hotline: APAC maintains an independent, externally resourced hotline to which suspected instances of misconduct, including violation of human rights or

breach of labour laws, can be reported anonymously. Concerns can be raised via a number of methods including via telephone, email and online through the supplier's web portal.

Measuring the effectiveness of our actions

APAC recognises the need to continue to regularly review the measures we have implemented in order to ensure that they are effective at identifying any modern slavery taking place in our supply chain. Accordingly, we will:

- monitor any trends in disclosures made to our Speak Up Hotline and take appropriate action
- regularly review our risk assessment processes to ensure that they are fit for purpose. As part of this process, we have already identified a risk assessment tool which we intend to implement which requires suppliers to provide details of the procedures they have in place to ensure that the modern slavery risk in their supply chains is minimised

This statement was approved by the Board of Australia Pacific Airports Corporation Limited on 17 February 2021.

Signed,

A handwritten signature in black ink, appearing to read 'Lyell Strambi', with a stylized flourish at the end.

Lyell Strambi
Chief Executive Officer
Australia Pacific Airports Corporation Limited

21 April 2021