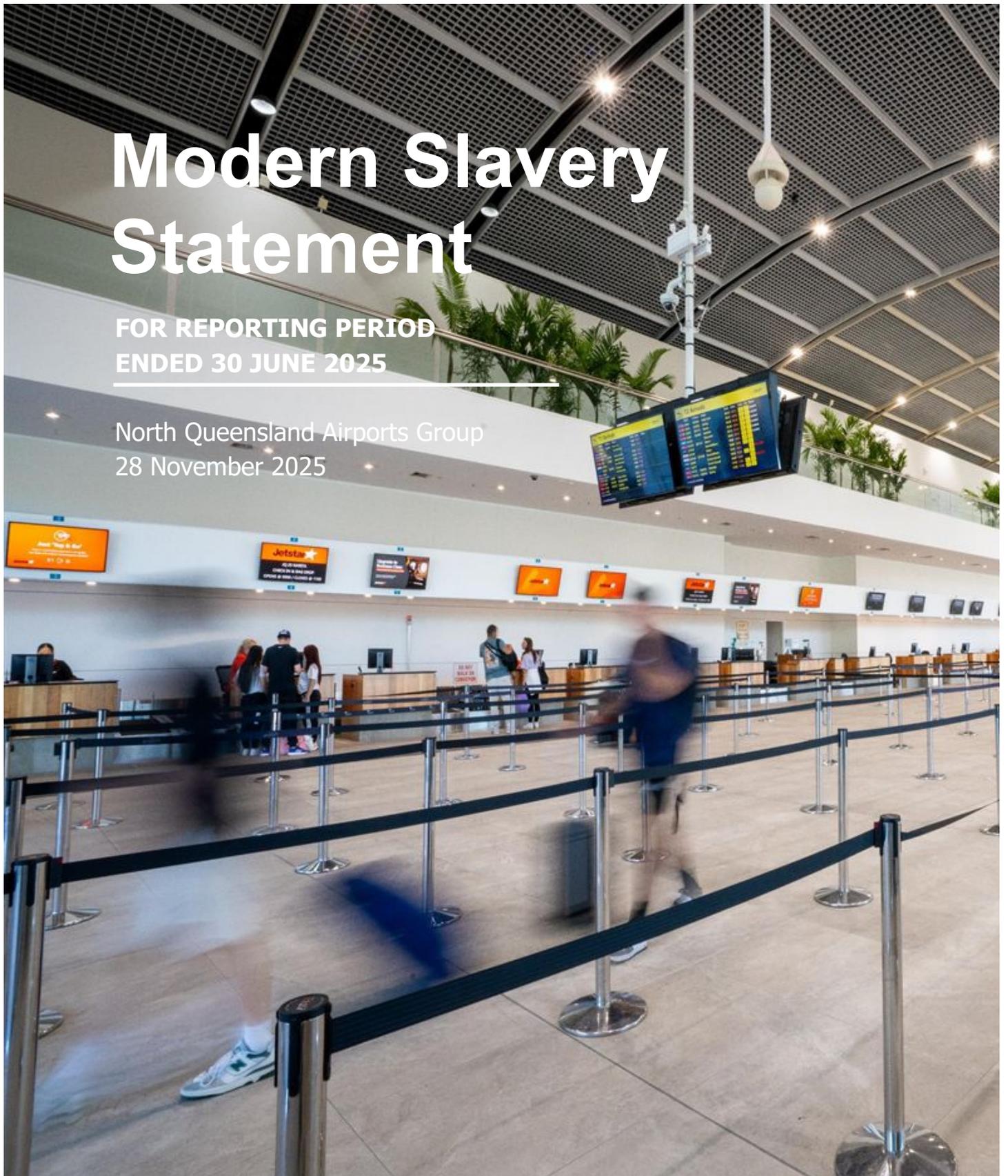


Modern Slavery Statement

FOR REPORTING PERIOD
ENDED 30 JUNE 2025

North Queensland Airports Group
28 November 2025



operating



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1. OVERVIEW

This Modern Slavery Statement is made by North Queensland Airports No. 1 (Mackay) Pty Ltd (in its own capacity and as trustee for North Queensland Airports No. 1 (Mackay) Trust) and North Queensland Airports No. 2 (Mackay) Pty Ltd (in its own capacity and as trustee for the North Queensland Airports No. 2 (Mackay) Trust) and their associated reporting entities (together, the **NQA Group, we, our**). This is a joint statement for the NQA Group in accordance with sections 14 and 16 of the *Modern Slavery Act 2018 (Cth)* (**Modern Slavery Act**) for the reporting period 1 July 2024 to 30 June 2025.

This Statement provides information about the NQA Group business operations and our plans to identify, monitor, manage and reduce modern slavery risks in our business operations and supply chains. As one of the largest employers in the Far North Queensland region, we take great pride in our local community, our people and our partners. We are committed to identifying, mitigating and seeking to eradicate any form of modern slavery within our operations and supply chains. We also expect our suppliers, customers and partners to identify and combat modern slavery. In this way, we continue to demonstrate and live up to our core business values of Care Always, Strengthen Community, Do the Right Thing, Think Ahead, Create Value and Safety Every Day.

This Statement reports on the following mandatory reporting criteria:

- (a) The reporting entity's identity.
- (b) The reporting entity's operations, structure and supply chains.
- (c) An assessment of the entity's modern slavery risks of modern slavery practices in its operations and supply chains and those of any entities which the reporting entity controls or owns.
- (d) Measures implemented to identify, assess and address risks of modern slavery within the reporting entity and its owned or controlled entities.
- (e) Information on how the reporting entity has been assessing the effectiveness of its modern slavery risk reduction actions.
- (f) Information on the consultation process undertaken by the reporting entity with any entities that it controls or owns or with which it is issuing a joint statement.
- (g) Any further relevant information.

2. REPORTING ENTITIES

The reporting entities for this joint Modern Slavery Statement are the twelve companies and five trusts within the NQA Group, listed in **Appendix One** to this Statement.

3. OUR STRUCTURE

The NQA Group has two ultimate parent companies. These are North Queensland Airports No. 1 (Mackay) Pty Ltd and North Queensland Airports No. 2 (Mackay) Pty Ltd, each governed by their own Board of directors.

The subsidiaries of North Queensland Airports No. 1 (Mackay) Pty Ltd comprise the asset owning entities within the NQA Group.

The subsidiaries of North Queensland Airports No. 2 (Mackay) Pty Ltd comprise the operating entities within the NQA Group.

Entities within the NQA Group share common staff and management structures, although each reports to its own Board. Employees are formally employed by Cairns Airport Pty Ltd, Mackay Airport Pty Ltd and MAPL Hotel Pty Ltd.

The roles of the entities within the NQA Group are outlined in **Appendix One** to this Statement.

4. OUR VALUES

The NQA Group is committed to upholding and continuously improving our practices to address the risks of modern slavery across the NQA Group, guided by our core values:

- **Care Always:** Care, service, compassion and respect guide the way we operate at all levels and with all people.
- **Strengthen Community:** We create a safe, secure and healthy culture for our people and customers.
- **Do the Right Thing:** We are accountable and do what is honest and ethical, demonstrating integrity and worthy of the trust of others.
- **Think Ahead:** Boldly approach the future through curiosity, adaptation and creativity.
- **Create Value:** In collaboration with others, we create positive organisational, social, environmental and economic value.
- **Safety Every Day:** We create a safe, secure and healthy culture for our people and customers.

Together, these values create a solid foundation for the NQA Group's efforts to combat modern slavery and human trafficking, ensuring that ethical practices are deeply embedded in our operations and supply chains.



5. OUR BUSINESS OPERATIONS

5.1 North Queensland Airports (NQA)

The NQA Group operates both Cairns Airport and Mackay Airport, as well as the Mackay Airport Hotel, which is managed by The Accor Group, under an outsourced hotel management agreement. The NQA Group's core purpose is to sustainably grow its aviation-related businesses in order to support the development and prosperity of our communities. To fulfil this purpose, across our two airports and the hotel, we undertake or facilitate the following core business activities

- Aviation services and facilities;
- Ground transport services and facilities;
- Airport food, beverage and retail offerings;
- Commercial and property leases for offices, industrial precincts, aviation-related hangars and parking, storage facilities and in-terminal leased areas;
- Airport infrastructure development and property maintenance; and
- Airport hotel and accommodation services.

The NQA Group's corporate head office is located in Cairns, Queensland with a secondary administration office in Mackay, Queensland. Across Cairns Airport and Mackay Airport, the NQA Group employs 140 staff, in addition to 44 employees at the Mackay Airport Hotel. While the majority of management and staff are based in Cairns, the remaining employees are located in Mackay. The Group is committed to fostering a flexible and supportive work environment, offering remote working arrangements where appropriate. Currently 5 employees working remotely from home offices across Australia with the flexibility to travel to either site as required. This approach supports work-life balance while maintaining operational efficiency and collaboration across locations.

5.2 Cairns Airport

Cairns Airport is one of Australia's leading regional airports, offering regional, domestic and international air connectivity. Cairns Airport is the gateway to the World Heritage Great Barrier Reef and Tropical Rainforests of North Queensland and is widely recognised as a key economic driver for the region. Cairns is among Australia's most aviation-dependent communities, with passenger movements per resident exceeding those of major capital cities by more than threefold. Currently, Cairns Airport services 14 domestic routes, 11 regional routes and 9 international routes, operated by 8 airlines.



5.3 Mackay Airport

Mackay Airport is located in the heart of Central Queensland's resource hub, adjacent to the renowned Whitsundays tourism region. Mackay Airport currently services 3 domestic routes operated by 3 airlines with over 70 flights arriving and departing every week. Along with this the Mackay Airport and Mackay Hotel play a vital role in supporting the Central Queensland resources sector by serving as a key transit hub for Fly-In Fly-Out (FIFO) workers. Its strategic location and connectivity to major mining regions make it an essential link for workforce mobility.





5.4 Mackay Airport Hotel (Ibis Mackay)

To complement the services provided by the Mackay Airport, the Mackay Airport Hotel (managed by the Accor Group) offers convenient, on-site accommodation tailored to the needs of FIFO personnel. With 152 guest rooms, 24-hour reception, swimming pool and on-site dining facilities, the hotel ensures comfort and accessibility for workers arriving or departing on early morning or late-night flights. This support enhances the efficiency and wellbeing of the region's resource industry workforce.

6. THE NQA GROUP MODERN SLAVERY RISKS

We recognise that our knowledge, practices and due diligence in addressing modern slavery risks must remain highly adaptable, reflecting the evolving nature of these issues. As a gateway and significant regional port for trade, the movement of people, tourism and economic activity, the NQA Group remains vigilant in monitoring and managing the risks that may arise within our operations and supply chain. We are committed to continuously improving our approach to ensure we respond effectively to emerging risks and maintain responsible business practices.

6.1 Modern Slavery Risks in NQA Operations

The NQA Group assesses the risk of modern slavery within its direct business operations as low, due to Australia's robust labour laws and high standards of corporate governance. The NQA Group complies with Australian labour legislation, ensuring all employees receive their legal entitlements, including minimum wage, superannuation, annual leave, personal leave, parental leave and public holidays. 'Safety Every Day' is a core value of the NQA Group and we are committed to providing safe working conditions while actively preventing discrimination and harassment in the workplace.

At NQA, all employees (excluding members of the leadership team) are employed under enterprise agreements that are collaboratively negotiated with employees, union representatives and employer representatives. Leadership team members are engaged under individual employment contracts.

We are committed to ensuring that all employees are paid fairly and treated equitably, in full compliance with their legal rights. As part of our dedication to transparency and gender equality, the NQA Group also participates in the annual Workplace Gender Equality Agency (WGEA) report.

The NQA Group's Code of Conduct outlines the expected standards of behaviour and ethical practices for all employees. It requires staff to act in a manner that upholds the NQA Group's reputation, comply with all relevant laws and work collaboratively with stakeholders to support compliance with modern slavery and labour laws.

To reinforce this commitment, all employees receive training on the NQA Group's governance policy framework. This includes comprehensive onboarding and annual refresher training on key policies such as the Code of Conduct, Prevention of Bullying, Harassment and Discrimination Policy and the Whistleblower

Policy. These measures support a strong culture of legal compliance and ethical conduct across the organisation.

6.2 Modern Slavery Risks in the NQA Supply Chains

The NQA Group acknowledges the potential presence of modern slavery risks within its supply chain. Given the diverse nature of our core business activities, we recognise that residual risks may exist across several areas of our procurement and supplier relationships.

We have identified that certain sectors in which our Tier One suppliers operate may carry elevated modern slavery risks. These include hotel and hospitality services, airport support services, construction and infrastructure and information technology (IT) services, particularly where labour hire is involved. These sectors may rely on a workforce that is migrant-based, lower socioeconomically positioned and/or casualised, which can increase vulnerability to exploitation.

Additionally, the manufacture of goods used in these sectors, such as equipment for hospitality, airport operations, construction and IT, has been associated with higher risks of forced labour, particularly in the extraction of raw materials and production of goods. Similarly, the manufacture of textiles and commercial supplies used in low-value procurement has historically been linked to modern slavery risks.

Despite these concerns, the majority of NQA's Tier One suppliers and their employees are based in Australia. As such, we assess the modern slavery risk within our Tier One supply chain to be low to moderate, due to Australia's strong labour laws and our close, ongoing relationships with these suppliers. Our regular engagement and oversight enable us to maintain visibility over their operations and support responsible practices.

However, we acknowledge that residual risks remain within our extended supply chains, particularly among lower-tier and low-spend suppliers, where visibility and influence are more limited. We remain committed to improving transparency and due diligence across all levels of our supply chain to mitigate these risks.

7. OUR SUPPLY CHAIN

7.1 Supply Chain

We understand that modern slavery encompasses various forms of exploitation, including forced labour, child labour, domestic servitude, debt bondage, sex trafficking, workplace abuse and human trafficking. We acknowledge that modern slavery can occur in any industry and region and it often remains hidden, making it challenging to identify and address. Given our location and the nature of our core business, we acknowledge that we have a unique opportunity to identify and combat modern slavery, as thousands of passengers pass through our airports daily.

Our procurement is conducted through our corporate entities (Figure 1), detailed below:

Figure 1. NQA Procurement activities

Entity	Procurement
Cairns Airport Pty Ltd	Engages contractors, suppliers and service providers to provide goods and services.
Cairns Airport Property Trust	Engages contractors and consultants to provide capital works, plant and equipment.
Mackay Airport Pty Ltd	Engages contractors, suppliers and service providers to provide goods and services.
Mackay Airport Property Trust	Engages contractors and consultants to provide capital works, plant and equipment.
MAPL Hotel Pty Ltd	Acquires hotel-related goods and services.
Mackay Airport Hotel Trust	Acquires hotel-related capital works, equipment and plant.

During this reporting period, the NQA Group engaged more than 80 new suppliers to provide a range of services, goods, works, plant and equipment and material to support our operations. These new engagements supplement our existing supplier base, with whom we have established relationships from previous reporting periods. Through our new supplier onboarding process, we know that the majority of our material suppliers are Australian-based companies.

7.2 Our Suppliers

NQA Group's suppliers are predominantly engaged across sectors such as construction and infrastructure, airport operations and support services, hotel and hospitality, IT and telecommunications, facilities maintenance, professional services and office and operational supplies.

While each of these supplier categories carries certain levels of modern slavery risk, the NQA Group maintains strong working relationships and daily interactions with many of its Tier One suppliers (those directly engaged by NQA). For example, we have well-established partnerships with our providers of airport security, cleaning, both capital and operational construction and maintenance services. These close relationships enable a high level of visibility and oversight into supplier operations, enhancing our ability to identify, assess and address modern slavery risks within our Tier One supply chain.

This direct engagement also allows us to implement robust monitoring and reporting mechanisms, conduct regular audits and maintain open lines of communication. Through contractual arrangements, the NQA Group requires its suppliers to actively manage their own exposure to modern slavery risks and uphold responsible business practices.

7.3 Supply Chain Due Diligence and Monitoring

To advance the management of modern slavery risk in our supply chains, we work to engage suppliers who have demonstrated a commitment to managing and reporting risks of modern slavery. This approach is a criterion when assessing suppliers for new procurement opportunities. These controls allow for regular supplier engagement, which gives us targeted insight into potential modern slavery risks, impacts and dependencies in the supply chains of our top suppliers.

This process is supplemented by supplier 'deep dives' and questionnaires, a declaration process for suppliers and the NQA Group's Modern Slavery Framework, Procurement Policy and its whistleblower hotline that NQA Group's employees, contractors and suppliers can use to confidentially report misconduct or dishonest or illegal activity within the NQA Group including concerns of any actual or potential modern slavery risk related issues.

Our major supplier contract templates include positive obligations for suppliers engaged by the NQA Group to comply with the Modern Slavery Act and NQA Group's modern slavery policies and to report modern slavery risks. Modern slavery compliance terms are essential elements of our template supplier contracts which, if breached, give NQA Group rights for the supplier's default. Many of our key supplier agreements include clauses that do not allow subcontracting without NQA Group's consent, meaning the NQA Group keeps direct oversight of those suppliers providing services in its supply chains. As our existing supplier agreements come up for renewal, we are including these updated provisions into the new contracts. This has been an ongoing initiative for the NQA Group since 2023 and therefore the majority of contracts are now on new terms which incorporate the modern slavery compliance provisions.

In late 2024, NQA Group employed a full-time procurement coordinator who has a pivotal role in the NQA Group's procurement process. To ensure NQA Group's continued modern slavery compliance, the procurement coordinator will conduct thorough supplier due diligence, including background checks and assessments. As part of the new supplier onboarding process, they will also conduct 'deep dives' on high-risk suppliers and projects and, with the business units, assess vulnerable areas in NQA Group's supply chain.

8. RISK MITIGATION AND GOVERNANCE MEASURES

The NQA Group adopts a multi-faceted approach to identifying, assessing and mitigating modern slavery risks within its operations and supply chains. This approach is embedded within our broader governance and risk management frameworks and includes the following key elements:

8.1 Governance Framework

The Governance Framework supports NQA's governance arrangements, objectives and principles for policy

development and review. It ensures consistent and high-quality policy documents that reflect and embed NQA's values, support quality assurance, reduce risk and which are readily accessible and understood by all employees.

The framework operates within a structured hierarchy, where documents lower in the hierarchy must align with those above them:

Legislation	Sets the legal obligations which NQA and each individual employee is required to meet.
Policies and Delegations	Sets out the high-level principles and standards that govern NQA, its operations and decision making responsibilities and delegations and gives effect to legislation and regulatory requirements.
Procedures	Sets out necessary processes, practices and actions to give effect to a policy.
Framework	Provides the structure for management and operational activities that bring together the policy documents to life.
Standard Operating Procedures, Plans & Manuals	Provides operational level procedures and practices that apply within particular departments, operations or part of the business and must be consistent with all policy documents above them in the policy document hierarchy.

8.2 Ethical Conduct and Corporate Governance

In addition to our policies and procedures (including the Code of Conduct, Whistleblower Policy and Procurement Policy) which establish clear expectations for ethical behaviour and compliance with modern slavery legislation, the NQA Group is committed to maintaining high standards of corporate governance. Our Board of Directors plays a critical role in upholding these standards by providing strategic direction, vision and leadership to ensure the NQA Group's long-term success and sustainability.

8.3 Additional Governance Measures

To further support our commitment to ethical operations and modern slavery risk management, NQA Group implements the following practices:

- **Internal and External Audits** – Regular audits assess compliance with policies and identify potential risks or areas for improvement. These audits ensure that internal operations and supplier practices align with our ethical standards.
- **Procurement Framework** – Our procurement processes include risk-based due diligence, supplier assessments and contract clauses requiring compliance with modern slavery laws and ethical labour practices.
- **Vendor Due Diligence** – We evaluate suppliers based on risk factors such as industry, geographic location and the nature of goods or services provided. This helps identify suppliers that may require enhanced monitoring or engagement.
- **Continuous Improvement Initiatives** – We are committed to ongoing improvement in our approach to modern slavery risk management. This includes policy reviews, enhanced staff training and efforts to increase transparency and traceability within our supply chains.

These measures are supported by strong governance structures, which are further detailed in the following section.

8.4 Multifaceted Approach

At an operational level, the NQA Group's senior executive team works closely with our Tier One suppliers to communicate expectations and monitor compliance with fair work conditions and modern slavery risk management. The high level of collaboration and regular engagement helps reinforce ethical standards, maintain visibility over suppliers practices and minimise potential exposure to modern slavery risks within our Tier One supply chain.

To strengthen oversight and accountability, the Board has established an Audit and Risk Committee, which holds specific responsibility for monitoring and managing modern slavery risks. This committee ensures that modern slavery considerations are effectively integrated into NQA’s broader risk management and compliance frameworks.

Key governance responsibilities are outlined below (Figure 2):

Figure 2. Key Governance Responsibilities

Leadership Levels	Responsibilities
Board	Strategic business planning, risk governance and aligning decisions with corporate values.
Audit and Risk Committee	Oversight of risk and governance, including modern slavery risk management.
Senior Executive Team	Day-to-day business management, ensuring adherence to governance frameworks and role modelling corporate values.

8.5 Modern Slavery Framework

The integration of the Modern Slavery Framework into our operations has firmly embedded modern slavery compliance as a core element of our daily business practices. This framework ensures that the identification, prevention and mitigation of modern slavery risks are not only prioritised but actively monitored across all levels of the organisation. By making these requirements central to our procurement processes, supplier engagement and governance structures, we reinforce our commitment to ethical conduct and human rights, fostering a culture of accountability and continuous improvement.

8.6 Training

As a regional gateway to the Asia-Pacific, the NQA Group recognises the potential risks of modern slavery and human rights violations within our airport terminals, particularly in the form of human trafficking. Training our employees and frontline team members to identify and respond to these risks is a critical component of our mitigation strategy.

During the reporting period, the NQA Group delivered comprehensive modern slavery training to all internal employees and frontline team members. This training equipped staff to recognise and respond to potential signs of exploitation, covering both the legal framework and practical measures for addressing modern slavery risks across our operations and supply chain.

Internal training completed during the period (also included in mandatory induction training):

- Modern Slavery Training
- Whistleblower Training
- NQA Code of Conduct

This initiative reflects the NQA Group’s ongoing commitment to combating modern slavery and ensuring the safety, dignity and rights of all individuals involved in or affected by our operations.

8.7 Reporting and Remediation

The NQA Group continues to maintain a confidential whistleblower hotline service where employees, suppliers, customers and stakeholders can report instances of actual or suspected unethical or unlawful conduct. Our Whistleblower Policy describes steps for reporting any suspected or actual conduct which may be fraudulent, corrupt, illegal, or criminal in any way, according to our Speak Up policy. We recognise that by encouraging reporting and ensuring early detection, our Whistleblower Policy can help identify and address instances of modern slavery swiftly. It promotes accountability, builds a culture of transparency and ensures compliance with relevant laws, significantly enhancing the NQA Group’s ability to prevent and mitigate modern slavery within its supply chain and operations.

9. ASSESSING EFFECTIVENESS OF ACTIONS

In this reporting period, The NQA Group did not identify any instances of modern slavery within our operations

and supply chain. We recognise that reviewing and assessing our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon.

We monitor the performance and effectiveness of our modern slavery actions, policies and processes with regard to our biggest Tier One suppliers, to ensure there is continuous improvement and progress within the space.

We have increased the frequency of the Modern Slavery Working Group to bi-annual meetings between Legal and Procurement to support modern slavery training and to support accountability for modern slavery-related activities across our business. If it is deemed necessary to hold further meetings they will be scheduled if and when required.

The NQA Group supplier template contracts stipulate that a supplier is required to implement due diligence procedures for its own subcontractors and that suppliers ensure compliance with NQA Group's modern slavery policies. The contracts also require suppliers to self-assess modern slavery risks and compliances and report those findings to the NQA Group on an as-requested basis. For onsite operations, The NQA Group undertakes site inspections to ensure compliance.

We assess the effectiveness of the NQA Group's modern slavery compliance by monitoring the participation and effectiveness of training programs designed to educate employees and suppliers about modern slavery risks and compliance requirements. In the reporting period, the training session and workshop were well attended.

During this reporting period, the NQA Group reviewed the effectiveness of its whistleblower hotline and other reporting mechanisms that allow employees and suppliers to report concerns anonymously. The whistleblower hotline was determined to be a valued resource and was retained for a further period.

In assessing NQA Group's modern slavery compliance within its operations, the NQA Group reviewed internal complaints and actively sought feedback through employee surveys. The employee surveys helped the NQA Group to gauge employee satisfaction and provided a platform for employees to provide anonymous feedback in relation to work conditions. No concerns were raised in relation to modern slavery. Similarly, no internal complaints or whistleblower hotline concerns were raised in relation to modern slavery risks.

10. ACHIEVEMENTS AGAINST FY24 INITIATIVES

In the FY24 report the NQA Group identified a list of priority actions to undertake in this reporting period to further strengthen our identification and mitigation of modern slavery risks in our operations and supply chains.

In this reporting period, the NQA Group focused on the following actions:

- a) **Modern Slavery Working Group:** The NQA Group continue to hold bi-annual NQA working group meetings, to support the delivery of the modern slavery risk reduction initiatives below.
- b) **Enhanced Supplier Due Diligence During the Tender Process:** To strengthen our commitment to ethical sourcing and modern slavery compliance, all contract templates have been updated to include specific modern slavery and supplier code of conduct clauses. For existing supplier contracts, any amendments or variations made during the contract term will provide an opportunity for the NQA Group to incorporate these clauses where necessary.
- c) **Supplier Due Diligence During New Supplier Onboarding:** With the employment of the Procurement Coordinator, the NQA Group is in the process of updating its policies and procedures to ensure that the supplier onboarding process is robust and ensures that all modern slavery requirements are met to be compliant with reporting requirements.
- d) **Updating Purchase Order Terms and Conditions:** Smaller procurements (those lower in quantity or value) are governed by our standard purchase order terms and conditions. Currently, there are two separate versions of this document: one for Cairns Airport and one for Mackay Airport.

Where bespoke Purchase Order agreements have been put in place they include modern slavery and code of conduct requirements to ensure compliance.

To streamline procurement governance and ensure consistency, a combined version of the purchase

order terms and conditions has been drafted. This unified document will cover both sites, ensuring that any future updates or changes apply equally across Cairns and Mackay Airports. This approach will help avoid discrepancies and improve compliance and efficiency in procurement practices. Modern Slavery Act and Code of Conduct clauses have been included in the draft version under review.

- e) **Reviewing Procurement Policies:** In accordance with our policies framework, a review of our existing procurement policies is being undertaken to align with best practices and reinforce our commitment to ethical sourcing.
- f) **Supplier Code of Conduct:** A Supplier Code of Conduct document has been created and approved for distribution. The Supplier Code of Conduct addresses the corporate values, ethical behaviours and minimum standards of conduct that we require of our suppliers. The requirement to agree to the Code of Conduct document has also been included in the updated version of the New Vendor Application/Change of Details Form that is currently in draft under review
- g) **Key Supplier Deep Dives:** During the reporting period a group of risked based key suppliers were chosen as part of a “deep dive” review. A supplier questionnaire has been created for the process and is currently under review to ensure that all requirements will be covered. The questionnaire will be provided to the key suppliers to complete and return for assessments to ascertain compliance based on their modern slavery reporting requirements. Two of the key suppliers identified have registered provided modern slavery polices on the Attorney General website. The NQA Group will continue to carry out enhanced modern slavery risk assessment and gain a deeper understanding of the modern slavery risks that exist in our supply chains, identifying opportunities for risk mitigation where possible.
- h) **Local Procurement:** The NQA Group will continue to support local business and to engage suppliers with reputations for ethical conduct and sound risk management processes.
- i) **Delivery of Training:** The NQA Group have commenced and will continue to deliver internal staff training on modern slavery and whistleblowing, including practical training to our business teams involved in procuring products and services and for our front line airport workers, to raise awareness of modern slavery risks and support risk identification.

These initiatives have assisted the NQA Group to maintain a robust framework for addressing modern slavery risks, ensuring that our supply chains are free from exploitation and aligned with our core values. By continuously improving our processes and policies, we aim to create a positive impact and uphold the highest standards of ethical business practices.

11. OUR FUTURE INITIATIVES, IMPACT AND CHANGE

The NQA Group has identified key actions to be undertaken in the next reporting period to further strengthen the identification and mitigation of modern slavery risks across our operations and supply chains. The NQA Group will focus on the following initiatives:

- a) **Enhanced Supplier Due Diligence During the Tender Process:** As part of the tender evaluation process, the NQA Group will update its tender evaluation checklist to include a requirement for bidders to demonstrate a robust modern slavery policy (or a commitment to implementing one) and to confirm agreement with the NQA Supplier Code of Conduct. This requirement will form part of the scoring criteria for conforming tenders.
- b) **Vendor Collaboration and Support:** Where required, the NQA Group is committed to working collaboratively with potential vendors to support their understanding of modern slavery prevention requirements. We recognise that some suppliers may be at different stages of their compliance journey and we are prepared to provide guidance and resources to help them align with our standards. This approach reflects our dedication to fostering responsible partnerships and promoting ethical practices throughout our supply chain.
- c) **Updating Purchase Order Terms and Conditions:** In FY26, the updated draft of the NQA Purchase Order Terms and Conditions will be finalised and made available to both internal stakeholders and vendors via our websites. These terms will be referenced in all purchase orders.
- d) **Reviewing Procurement Policies:** A comprehensive review of key NQA procurement policies and procedures will be completed in FY26. This review will ensure alignment with modern slavery

requirements and the NQA Supplier Code of Conduct.

- e) **Supplier Code of Conduct Implementation:** The NQA Supplier Code of Conduct has been finalised and is ready for distribution. In FY26, it will be systematically issued to all existing vendors and included as part of the onboarding process for new vendors. Vendors will be required to acknowledge and sign the document to confirm their commitment to compliance.
- f) **Key Supplier Deep Dives:** In FY26, the Procurement Coordinator, in collaboration with the Legal team, has commenced the development of an updated supplier questionnaire and an audit process to identify a list of current suppliers that are required to complete it. NQA Legal and Procurement will also propose a due diligence process, which may include the use of approved search tools to assess vendor viability. Further deep dives will be conducted to expand the scope of supplier risk assessments.
- g) **Local Procurement:** In FY26 the Procurement Coordinator will continue to provide bi-annual reporting to the legal team for a modern slavery statement that will be included in future modern slavery reporting requirements.
- h) **Delivery of Training:** In FY26 the NQA Group will continue to provide mandatory training on an annual basis for modern slavery and whistleblowing. The NQA Group will also engage with the Australian Border Force for training to be provided to NQA employees on Human Trafficking risks.
- i) **Vendor Onboarding:** In FY26 the vendor onboarding process will be enhanced to include an updated vendor questionnaire that includes a requirement to provide information in regards modern slavery and code of conduct. This document is currently in draft awaiting final reviews.
- j) **Technology One ERP Implementation:** With the introduction of our new ERP system through Technology One in mid-November 2025, we will significantly strengthen our ability to manage and monitor modern slavery compliance across the supply chain. This integrated platform enhances transparency, streamlines procurement workflows and enables more effective tracking of supplier practices. By embedding modern slavery requirements into our digital processes, we ensure that ethical sourcing and risk mitigation are not only prioritised but seamlessly incorporated into our everyday operations.

12. CONSULTATION

This Modern Slavery Statement was prepared in consultation with our CEO and the NQA Groups management team, the procurement team, operations team, property and infrastructure team, legal, risk and governance team and the human resources team.

This Modern Slavery Statement was also considered by the NQA Group's Audit and Risk Committee and by the NQA Board of Directors.

13. APPROVAL

This Modern Slavery Statement was approved by the Board of North Queensland Airports (Mackay) No. 1 Pty Ltd entities and the Board of North Queensland Airports (Mackay) No. 2 Pty Ltd entities.



Signed:

Robert Hardy
Chairperson, North Queensland Airports
(Mackay) No. 1 Pty Ltd entities



Signed:

Emeritus Professor Sandra Harding AO
Chairperson, North Queensland Airports
(Mackay) No. 2 Pty Ltd entities

APPENDIX ONE

The Reporting Entities for the purpose of this joint Modern Slavery Statement are the 12 companies and 5 trusts within the NQA Group identified below:

North Queensland Airports No. 1 (Mackay) Pty Ltd in its own capacity and as trustee for North Queensland Airports No. 1 (Mackay) Trust	ACN 134 137 312 ABN 83 837 314 764
North Queensland Airports No. 2 (Mackay) Pty Ltd in its own capacity and as trustee for North Queensland Airports No. 2 (Mackay) Trust	ACN 134 137 358 ABN 11 805 258 426
Cairns Airport Holding Company Pty Ltd	ACN 134 137 296
Cairns Airport Property Holding Pty Ltd as trustee for Cairns Airport Property Trust	ACN 134 137 232 ABN 61 295 533 448
Cairns Airport Pty Ltd	ACN 132 228 221
Mackay Airport Holding Company Pty Ltd	ACN 134 137 401
Mackay Airport Property Holding Pty Ltd as trustee for Mackay Airport Property Trust	ACN 134 250 454 ABN 43 910 193 189
Mackay Airport Pty Ltd	ACN 132 228 534
Mackay Airport Property Holding (Hotel) Pty Ltd as trustee for Mackay Airport Hotel Trust	ACN 600 078 064 ABN 91 700 972 306
MAPL Hotel Holdings Pty Ltd	ACN 600 078 135
MAPL Hotel Pty Ltd	ACN 600 078 144
NQ Airports Finance Pty Ltd	ACN 133 656 881

The roles of the NQA Group entities are outlined in the table below:

NQA Entity	Role within NQA Group
North Queensland Airports No. 1 (Mackay) Pty Ltd	Ultimate parent company for asset owning subsidiaries.
Cairns Airport Property Holding Pty Ltd as trustee for Cairns Airport Property Trust	Holds the lease rights for Cairns Airport.
Mackay Airport Property Holding Pty Ltd as trustee for Mackay Airport Property Trust	Holds the lease rights for Mackay Airport.
North Queensland Airports No. 2 (Mackay) Pty Ltd in its own capacity and as trustee for North Queensland Airports No. 2 (Mackay) Trust	Ultimate parent company for operational subsidiaries.
Cairns Airport Pty Ltd Mackay Airport Pty Ltd MAPL Hotel Pty Ltd	Operational entities within the NQA Group employ NQA Group staff Cairns Airport Pty Ltd operates Cairns Airport Mackay Airport Pty Ltd operates Mackay Airport MAPL Hotel Pty Ltd is the operating entity for Mackay Airport Hotel and has engaged the third party airport manager to manage the hotel operations.