

# Modern Slavery and Human Trafficking Statement





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Dame Therese Walsh Air New Zealand Chair

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Greg Foran
Air New Zealand Chief
Executive Officer

## Air New Zealand's 2023 Modern Slavery and Human Trafficking Statement

Tēnā koe,

The last few years have undoubtedly been some of the most challenging our business has ever seen. As we reopened our network in 2023 and undertook our largest recruitment drive ever, our promise of manaaki and taking care further than any other airline remained front and centre. Our purpose is to connect New Zealanders to each other and to connect New Zealand to the world. Our manaaki extends to our team and workers in our supply chain.

Supporting a fair, responsible and transparent supply chain is incredibly important to Air New Zealand. This year the airline established two key roles to further support the airline's work to address modern slavery and human trafficking.

There are also important legislative developments taking place in New Zealand. In July 2023, the New Zealand Government announced it would start drafting modern slavery legislation over the next six months. This announcement followed public consultation during 2022 and means New Zealand will have a framework for meeting the requirements to tackle modern slavery laid out in the European Union and United Kingdom free trade agreements. Air New Zealand supports the implementation of modern slavery legislation. Our Chief Sustainability Officer has been an active participant in the Government's Modern Slavery Leadership Advisory Group, providing recommendations and advice on what a framework might look like for Aotearoa New Zealand. While it may take some time until the legislation is finalised, we remain committed and steadfast in progressing our own ongoing supply chain due diligence.

Geopolitical unrest and the impacts of climate change will add additional risks to the world's most vulnerable citizens. We strongly believe we have a responsibility to minimise these risks where we can.

Some highlights from 2023 include:

- Undertaking the largest ever recruitment drive in our history, including establishing two new key roles to enhance and accelerate our efforts to prevent modern slavery and protect human rights,
- Expanding access to Speak Up (independent reporting line) to workers in our supply chain,
- Enhancing and further embedding our supply chain risk management tools, and
- Advocating for modern slavery legislation in New Zealand and participating on the Government's Leadership Advisory Group.

We present this statement, approved by the Air New Zealand Board on 20 December 2023 on behalf of Air New Zealand Limited and its controlled entities.

Dame Therese Walsh Air New Zealand Chair 20 December 2023

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Greg Foran
Air New Zealand Chief Executive Officer
20 December 2023

Letter from the Chair and CEO

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## This Modern Slavery and Human Trafficking Statement (Statement) is made on behalf of the consolidated Air New Zealand Group (the Group), including Air New Zealand Limited and its controlled entities. The parent company, Air New Zealand Limited, is domiciled in New Zealand, registered under the Companies Act 1993 and listed on the New Zealand and Australian Stock Exchanges.

# Air New Zealand Limited is the only "Reporting Entity" within the Group, as defined by the Australian Modern Slavery Act 2018 (Cth). Its subsidiary companies are 100 percent owned by Air New Zealand Limited (Appendix 1). The Group's primary business is the transportation of passengers and cargo on scheduled airline services. Operational activities relating to this business is generally carried out through Air New Zealand Limited, including contracting with employees, suppliers, contractors and airport companies (although there are some legacy employment contracts under Mt Cook Airline Limited and Air Nelson Limited which the Group is aiming to transition to Air New Zealand Limited in due course). Directors and management of the subsidiary companies are employed by Air New Zealand Limited and Air New Zealand has ensured that the subsidiary companies have had relevant engagement on modern slavery risks and the development of this Statement.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (UK), the Modern Slavery Act 2018 (Cth) (Australia) for the financial year ending 30 June 2023 (referenced as 2023 throughout the Statement). It identifies the steps Air New Zealand Limited and its controlled entities took to identify, assess, mitigate and remediate modern slavery and human trafficking risks in its operations and supply chains during 2023. The information presented in this Statement is provided as a consolidated description for the Air New Zealand Group.

#### NEW ZEALAND MODERN SLAVERY LEGISLATION BEING DRAFTED

In July 2023, the previous New Zealand Government announced it will begin drafting modern slavery legislation. Organisations with annual revenue over NZ \$20 million will be required to report on the actions they take to address modern slavery and worker exploitation risks in their operations and supply chains. A public register of annual modern slavery statements will be established, like that in Australia and the United Kingdom (UK).

Following public consultation in 2022, there was widespread support from businesses, NGOs and members of the public that legislation is crucial. A number of New Zealand businesses are already working to address modern slavery in their operations and supply chains, particularly those already reporting under the Australian and UK legislation, like Air New Zealand. However, domestic legislation will further lift current efforts, provide transparency, and level the playing field for all large New Zealand businesses.

The previous Government advised broader reforms would follow, including 'due diligence' and 'take action' responsibilities.

This important development demonstrates New Zealand's commitment to addressing modern slavery and worker exploitation and recognises the expectations of customers and New Zealand's trade partners. Likewise, Air New Zealand remains committed to meeting these expectations, and we will continue to strengthen our controls and enhance our approach accordingly.

### About this Statement and the Reporting Entity



Air New Zealand primarily provides air passenger and cargo transport services within New Zealand, as well as to and from Australia, Asia, the Pacific Islands, and North America.

Following three years of disruption and New Zealand's borders opening again in July 2022, FY23 was our first full year of flying since the Covid-19 pandemic. This year we hired more than 3,000 people, returned to all our international destinations, and flew 169,251 flights across our network. We have 69 offices located in New Zealand, Australia, America, Asia, and the Pacific Islands with employees and contractors providing commercial and support services.





Our culture of manaaki and care starts with our team.

12,024 11,882

workforce1

direct employees

UK

86

**North America** 

06

**South America** 

The start of the year saw Air New Zealand begin its post-Covid rebuild – a mammoth task which involved the biggest recruitment drive in Air New Zealand's history. We were thrilled to be able to offer roles to many of those who unfortunately had to leave the airline during the Covid-19 pandemic. Welcoming their extensive expertise and passion back has been incredibly pleasing and made the re-start less challenging than may otherwise have been the case.

**Pacific** 

**Asia** 

11,576

**Australia** 

**New Zealand** 

To support the speed of growth required we launched a 'Join our whānau' campaign to highlight some of the roles across the business and give a flavour of who we are and what it is like to be an Air New Zealander. A number of areas of the business also participated in the Auckland Airport Job Fair as a way to engage with eager jobseekers and attract new people to our business. We also increased our start rate at our main airports (Auckland, Wellington, and Christchurch, excluding our lounges) to \$30 per hour as part of our focus on creating good, sustainable jobs at Air New Zealand.

Full-Time Equivalent labour (FTE) increased 29 percent to approximately 11,500 compared to 8,900 in the prior year and we spent 241,000 hours training our people. In 2023, the majority (99%) of our workforce were directly employed, either under an individual or collective agreement, so we have direct visibility and control of their employment terms and conditions to ensure these comply with current legislation. Seventy seven percent of employees work in roles covered by collective agreements, and 88 percent of these same employees are represented by a union.

In November 2022, Kiri Hannifin joined Air New Zealand as the airline's first Chief Sustainability Officer. The Chief Sustainability Officer is a member of the Executive, reports to the Chief Executive Officer, and leads our work to address modern slavery under our Sustainability Framework. We also recruited another newly established role, Senior Manager - Responsible & Sustainable Sourcing, reporting into the Chief Sustainability Officer to lead our work on modern slavery and our broader Sustainable Procurement strategy and initiatives. These roles, alongside our Legal, Supply Chain and Procurement teams, will help us to accelerate and enhance our efforts to protect human rights.

With this record level of recruitment comes a renewed focus on culture and engagement, ensuring we maintain the core of what makes working at Air New Zealand so special. At its heart, our people.

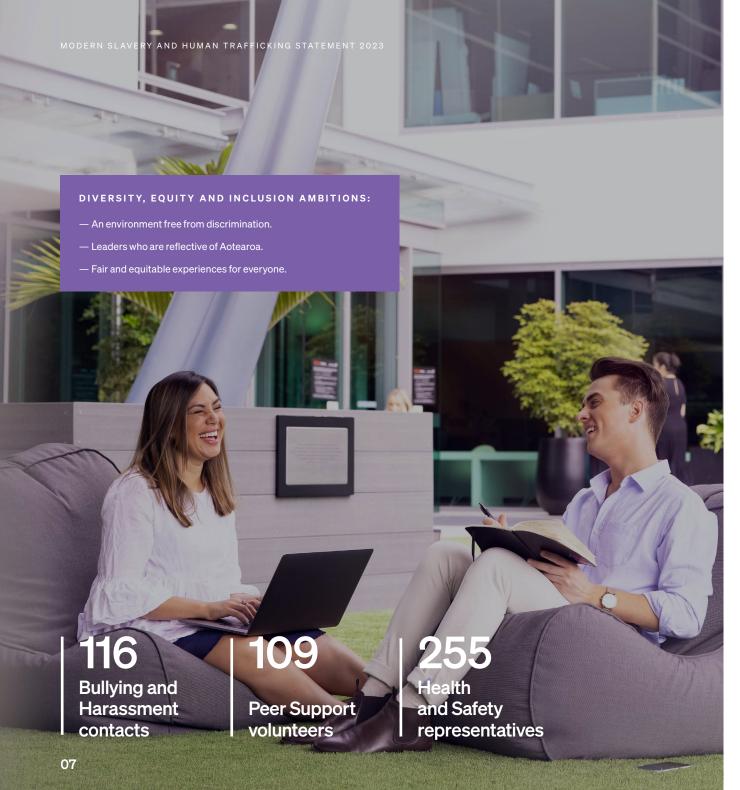
What is the most important thing in the world? He aha te mea nui o te ao?

It is the people, it is the people, it is the people. He tāngata, he tāngata, he tāngata.

1 Workforce includes employees and contingent workers as at 30 June 2023. It excludes employees on Parental Leave / Extended Leave without Pay, Persons of Interest and Airport Contractors. The mapped figures represent both employee and contingent workers.

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**Our Team** 





We work to continuously improve and maintain an engaged employee culture. This year we spent time reviewing and refreshing our Diversity, Equity & Inclusion strategy. We have long been committed to having a diverse leadership group and we are proud to keep ensuring our organisation is truly representative of Aotearoa New Zealand.

Going forward, we will continue to focus our efforts to grow our women, Māori and Pasifika leadership pipelines as well as identifying opportunities to grow representation in other areas to ensure we are representing the diversity of Aotearoa New Zealand. We want to be more mindful of intersectionality in this space, acknowledging each person can identify in more than one way. We currently have 40.7 percent of women in senior leadership roles, a drop of 4.8 percent from last year as we've seen some of our talented women move into executive roles at other organisations, and 16 percent Māori and Pasifika leadership representation, 1.2 percent up from last year.

A key focus throughout 2023 was the continuing growth and broadening of our key employee wellbeing tools, resources and support networks that employees can reach out to, including Bullying and Harassment contacts, Peer Support Network volunteers, and Health & Safety Representatives (HSRs).

In addition, the Employee Assistance Programme and Wellbeing Check-Ins have continued to operate, including for our offshore employees. This has been particularly important as we have reopened various overseas ports and routes over 2023. As well as human resource business partner and line manager support, we now have 116 Bullying and Harassment contacts, 109 Peer Support volunteers, and 255 HSRs across the organisation, covering a diverse range of work groups, locations and demographics. The growth of these networks has been important to support our significant increase in employees over 2023. Overall utilisation of the support services dropped to 14.7 percent in 2023 compared to 21.3 percent in 2022. This was largely expected due to the increase in employee population and a steady de-escalation of our acute response to Covid-19.



#### Potential risks in our operations

We consider the risk of modern slavery in our directly recruited team (employees and contractors) to be low, given the policies, training, monitoring and controls in place.

We acknowledge there may be higher inherent risks in our indirectly recruited workforce (i.e., where workers are contracted through third parties) and we continue to review this in more detail in 2024 to better understand and manage these risks.

Like all global airlines, there is risk that our airline services may also be used by third parties for human trafficking within and between countries. Our cabin crew and pilots are the roles most likely to be exposed to potential trafficking events therefore we provide training to them on how to identify and report events (see page 9).

## Mitigating and managing risks in our operations

#### CODE OF CONDUCT AND ETHICS

The <u>Air New Zealand Code of Conduct and Ethics</u> sets out the behaviour we expect from our employees and sets out our business principles. The Code of Conduct and Ethics makes it clear that we will not tolerate child labour and are committed to the elimination of all forms of forced and compulsory labour in our workforce and supply chains. Through this Code of Conduct and Ethics, we also commit to the application of social, ethical, and environmental considerations in our procurement and supply chain decisions. All employees and contractors are required to abide by the Code of Conduct and Ethics, and complete annual refresher training on the Code's obligations.

Other relevant policies include:

- Health, Safety and Wellbeing Policy
- Workplace Bullying Policy
- Harassment and Sexual Harassment Policy
- Just Culture and Reporting Policy
- Equality, Diversity and Inclusion Policy
- Employee Privacy Statement
- Anti-bribery and Corruption Policy
- Disciplinary Policy

### OUR BUSINESS PRINCIPLES EXPRESS WHAT WE VALUE AND OFFER DIRECTIONAL GUIDANCE TO OUR TEAM:

- 1. Operate safely, responsibly and reliably
- 2. Act with integrity, honesty and transparency
- 3. Protect our people, property and information
- 4. Treat people fairly and with respect
- 5. Comply with the law

#### TEAM TRAINING AND CAPABILITY BUILDING

All our employees and contractors are required to undergo training modules on an annual basis, including training on Air New Zealand Code of Conduct & Ethics and Speak Up. In 2023, 93 percent of our employees and contractors (excluding pilots and cabin crew who run on a separate rostered calendar) had completed their Code of Conduct training.

#### **GRIEVANCE CHANNELS**

We have mechanisms in place to protect whistle-blowers including assuring confidentiality and protection against retaliation or any form of harassment. All employees and contract workers are encouraged to raise concerns about potentially unethical or illegal conduct through the Speak Up reporting line. An independent 'Speak Up' service is provided for situations where individuals may not feel comfortable raising concerns via their manager or human resources business partner. This service is available by phone, post and online 24 hours a day, 7 days a week and is run by an independent third-party provider on behalf of Air New Zealand.<sup>2</sup> We promote the Speak Up services to team through training, posters and annual promotional campaigns. Our Just Culture and Reporting policy and procedures support a fair and confidential process to investigate and address grievances in a responsible and appropriate manner. In 2023,

<sup>2</sup> Noting that the phone service is manned by a call centre 24/7 who will connect callers to a Speak Up operator who is available from 7am to 9pm NZT and can be available outside of these hours on a reasonable endeavours basis.





we received 38 Speak Up reports from either employees or contractors, and all were investigated and addressed. None of the reports related to modern slavery or human trafficking allegations.

#### **HUMAN TRAFFICKING TRAINING AND REPORTING**

In 2018, we introduced targeted training for our Cabin Crew and Pilots, which has been developed by our Group Resilience team to assist in the detection and prevention of human trafficking. The ongoing training for cabin crew and pilots is a crucial element in protecting human rights of some of our vulnerable passengers, and we continue to refine and implement dedicated policies, procedures and reporting protocols for managing suspected human trafficking.

Training in the detection and prevention of human trafficking is now also provided to our front of house ground employees, airport managers and airport operational managers, and is regulated through the Operator Security Programme.

Our Learning Management System (LMS) houses the records of employees who have completed the online (IATA based) Human Trafficking awareness module. These employees include new cabin crew members and those in other customer facing roles. The Human Trafficking module is available to all operational employees through our LMS.

Reports of human trafficking events submitted by employees are thoroughly investigated and reported to the appropriate authorities. In 2023, two suspected cases were reported by crew, investigated, and assessed, which included discussions with external agencies, as not being human trafficking events. This proactive reporting reflects our staff's understanding of the importance of responding quickly and effectively to modern slavery risks where identified.

We continue to work with other airlines and industry experts to ensure that any training provided remains relevant so that we can play our part in eliminating human trafficking. A review of our LMS module and procedures for identifying and managing suspected cases is planned for 2024 with external expert review.

In 2023 Air New Zealand was proudly awarded the 2023 Randstad award for Most Attractive Employer, the seventh time the airline has received this award.

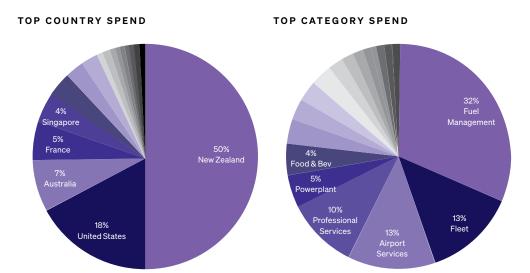
You can read more about our people-related targets and progress towards these in our <u>2023 Sustainability Report</u>.



Our supply chain is centralised. The airline sources goods and services from around the world, including aircraft and aircraft parts, onboard products, catering, and corporate and digital solutions.

Given the international nature of our operations, there are suppliers operating within different geographical and regulatory environments.

In response to Covid-19 and the subsequent global supply chain and geopolitical disruptions, our supply chain had to adjust quickly to the changing demands of our business. Despite these impacts on our organisation and supply chain many of which are ongoing, we remain focused on identifying risks within our organisation and in our supply chain and mitigating such risks as appropriate. We have also continued to look at opportunities to develop and evolve our processes and approach.



Our Supply Chain \$4.7B

Supplier spend<sup>3</sup>

4,789

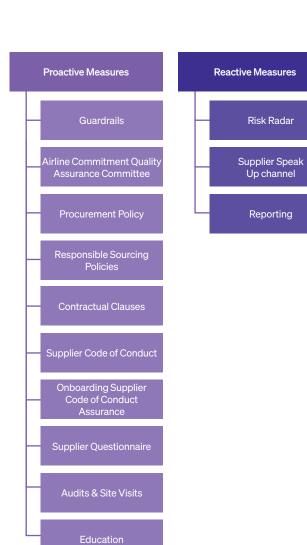
Number of direct suppliers

50%

Spend in Aotearoa New Zealand

3. Supplier spend excludes statutory fees and charges.





Collaboration

#### Identifying and managing risks in our supply chain

Our supply chain is large, complex, and global, which is why we use a range of tools to assess risk and use this to inform our sourcing and risk management. We have assessed the manufacturing sites based in China used to produce our inflight products to be higher risk and conduct annual audits to monitor and mitigate these risks. We plan to conduct a broader and international supply-chain risk assessment in 2024 to enhance and guide what level and form of due diligence (e.g., self-assessment questionnaires or audits) we require for specific categories of suppliers and/or locations going forward.

#### SUPPLIER CODE OF CONDUCT & ASSURANCE

We are committed to the highest standards of social and environmental responsibility and ethical conduct. In 2015, we launched a Supplier Code of Conduct to ensure that these same commitments are made by our supply chain. The Supplier Code of Conduct outlines the standards we expect from suppliers, particularly around sustainability and improving supply chain transparency. Through the Supplier Code of Conduct, we encourage our suppliers to embrace international standards relating to human rights. Suppliers must respect the labour rights of their employees in the workplace and monitor human rights within their supply chain. As a minimum, suppliers must ensure that employees engaged in the manufacture and supply of products and services are voluntarily employed, and under no circumstance is any form of forced, coerced, bonded, indentured or involuntary labour used. When suppliers sign up to our contracts this almost always includes acceptance of our Supplier Code of Conduct. The supplier's acknowledgement of that Code is also registered in Ivalua, our procurement and supplier management system, as part of onboarding. With Ivalua being a new platform that we introduced in 2021, not all suppliers have vet completed this step and we continue to follow up with them to complete this. If we engage with a supplier on their own contractual terms and they have their own Code of Conduct and related policies which align with our principles and standards, we may choose to recognise their policies.

#### PROCUREMENT POLICY

We have a Procurement Policy that prescribes the process for appointing new suppliers, conducting supplier due diligence, establishing supply arrangements, executing supply contracts, making purchases and placing orders, and monitoring compliance, including with respect to the Supplier Code of Conduct and our human rights expectations.

#### RESPONSIBLE SOURCING POLICIES

We have sourcing policies for <u>palm oil</u> and sustainable aviation fuel. Both have known sustainability risks in their supply chains, including beyond our Tier 1 direct suppliers and including with respect to labour practices, and as such we have established sourcing criteria to mitigate these risks (e.g., by requiring Roundtable on Sustainable Palm Oil certification).

#### CONTRACTUAL CLAUSES

Our standard supply contract templates used for the purchase of goods and services includes a contractual obligation on the supplier to comply with our Supplier Code of Conduct. Suppliers are required to report any non-compliance, implement remedial plans as appropriate and, if remediation is not possible or not undertaken, the contract may be terminated. We regularly review these contractual clauses, and will do so again in 2024, to ensure these remain fit for purpose and effective.

#### SUPPLIER QUESTIONNAIRE

Air New Zealand's Ivalua Supplier onboarding workflow includes a Supplier Questionnaire which is designed to identify potential risks, including modern slavery and human rights risks. Responses are monitored and managed by our Procurement team to manage any risk indicators identified. In 2024, we will review the questions to further enhance them and our supplier risk management.

#### **AUDITS & SITE VISITS**

Since starting direct sourcing with several manufacturing companies in China in 2013, we have conducted annual audits through our third-party auditor. Our direct sourcing arrangements allow for the Tier 1 (direct) suppliers to sub-contract specific services to their wider Tier 2 partners. The audit programme focuses on the manufacturing sites, whether it be Tier 1 or 2, where the highest risk is likely to lie and while working in conjunction with the primary contracted supplier on all audits. The audit programme is designed to build awareness of modern slavery risk, practices, and standards with these manufacturing companies. The audit programme is aligned to the SA8000 certification standard, is modelled on ISO standards, and is designed to encourage organisations to develop, maintain, and apply socially acceptable practices in the workplace by assessing over 150 checkpoints. We regularly monitor critical, major, and minor non-compliance incidents and matters, and have processes to ensure that remedial plans are prepared and implemented when there is non-compliance, having regard to the severity of the non-compliance.

In 2023, we audited eight manufacturing sites with six suppliers graded a pass rate of C or higher (scores above 96 percent). Two suppliers were graded a fail rate of E with scores of 94 percent and 92 percent respectively. Both were failed on non-conformances for Health & Safety evacuation processes with some safety exits and evacuation routes blocked. Corrective action plans have been put in place and follow-up audits are being scheduled.

#### RISK RADAR

Another tool we use to identify, assess and monitor potential risk areas in our supply chains is Sphera's Risk Radar, previously Risk Methods. Risk Radar leverages the power of artificial intelligence to monitor our supplier community and reveal risks in real time. It uses hundreds of data sources and thousands of monitored news sites to assess a number of risks - financial risk, natural hazard risk, reputational risk, geopolitical risk, man-made risk and cyber risk, as well as human rights risks. Risk alerts are tracked in our supplier management system, triaged, and managed by our team. In 2023, there were 52 suppliers with human rights risks flagged in Risk Radar. In 2024, we will explore how we can use this information in our supply chain risk assessment and to inform our enhanced due diligence framework.

#### **EDUCATION**

We support our team to understand the risks of modern slavery and human trafficking through training and awareness, including through a formal online learning module on human trafficking available to all our operational team. In 2023, 2580 of our team completed the human trafficking module. In 2024, we have plans to review the human trafficking module to assess if it remains up to date with best practice or could be improved, as well as develop a module on our Supplier Code of Conduct, which would discuss how we use the Code as one way to communicate to suppliers the labour and human rights standards we expect in our supply chain and as part of doing business with us. We will also continue to report on risks and best practice recommendations through team meetings and briefings.

#### COLLABORATION

To address modern slavery and human trafficking we must take a holistic, collaborative, multi-stakeholder approach. We are seeing increasing collaboration and recognition of this amongst business, governments, non-governmental organisations, and civil society, both in New Zealand and internationally. Kiri Hannifin, our Chief Sustainability Officer, is a member of the Modern Slavery Leadership Advisory Group convened by the Government in 2021. This Leadership Advisory Group brings together businesses, non-governmental organisations, unions and academics to work alongside a team from the Ministry for Business Innovation and Employment to advise the Government on modern slavery legislation proposals.

#### SUPPLIER SPEAK UP

In 2023, we revised our independent Speak Up services agreement (see page 8) to broaden accessibility of this 24/7 service to our supply chain workers. In 2024, we will be launching and promoting the availability of this channel for raising concerns to our suppliers and their workers.

You can read more about our Sustainable Procurement performance in our 2023 Sustainability Report.





Air New Zealand recognises that it operates in a complex global risk environment and while this environment cannot be devoid of risk, risk can be managed.

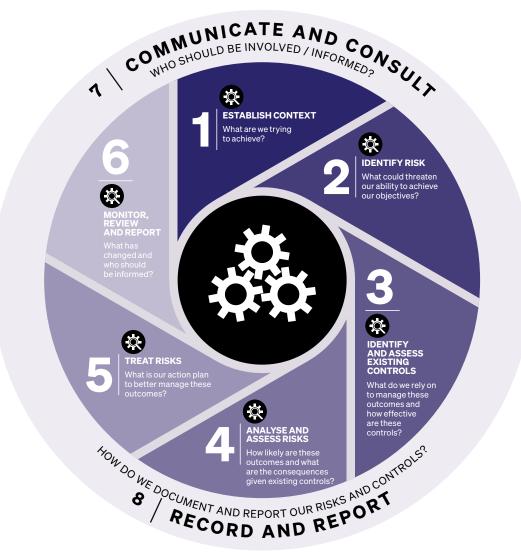
In late 2022, and again in December 2023, the Board enhanced its approach to risk management by defining and communicating its Risk Appetite Statement across the airline's top 12 Strategic Risks. This enables decision-makers in the airline to understand how willing the airline is to take risks.

The Risk Appetite is aligned to the Strategic Risk areas. For modern slavery which falls within the Legal and Compliance risk dimension, the Board has an averse risk appetite, meaning we are committed to playing our part towards the elimination of modern slavery and human trafficking in our supply chain and operations. The Board expects the relevant Risk Appetite to be considered in matters presented to it and will continue to review the Risk Appetite Statement to respond to changes in the airline's top strategic risks and the Board's appetite for risk. Air New Zealand's Enterprise Risk Management Framework provides a Group-wide approach to helping manage these risks and for assessing the effectiveness of our controls to manage these in line with our Risk Appetite.

Tracking the effectiveness of actions to address modern slavery and human trafficking is complex. Nevertheless, the airline will continue to assess the effectiveness of our controls on an ongoing regular basis and through our Enterprise Risk Management Framework. We have identified some priority actions for 2024 to further improve the effectiveness of our approach (see page 14).

## Assessing our effectiveness

**OUR RISK MANAGEMENT FRAMEWORK** 



We recognise there is still much to do and have identified the following priorities for 2024 to further strengthen our modern slavery and human trafficking response:

### Looking Ahead to 2024



The drafting of this Statement was led by the Sustainability team in consultation with key business functions that provided input into the Statement including our Supply Chain, Procurement, Legal, Risk and Compliance, Resilience and People teams.

# Consultation across the Group and with its Entities





#### SIGNIFICANT SUBSIDARIES COMPRISE:

Name	Principle activity	Country of incorporation
Air Nelson	Aviation services	New Zealand
Air New Zealand Associated Companies Limited	Aircraft leasing and financing	New Zealand
Air New Zealand Associated Companies Limited	Investment	New Zealand
Air New Zealand Regional Maintenance Limited	Engineering services	New Zealand
Mount Cook Airline Limited	Aviation services	New Zealand
Teal insurance Limited	Captive insurer	New Zealand

All subsidary entities above have a balance date of 30 June and are 100% owned.





Please feel free to contact us at sustainability@airnz.co.nz with any comments, queries or suggestions regarding our Statement. We welcome a dialogue on this important topic.

## AIR NEW ZEALAND