



FY24 Modern Slavery Statement



Auckland Airport supports Australia's Modern Slavery Act 2018 (Act). We are a business that strives for improvement and we are constantly reviewing our operations to identify and mitigate all aspects of risk. Our values of 'All in – Tātou Tātou, Know How – Kōkiri Tahi and Let's Go – Karawhiua' underpin our commitment and approach to raising awareness of human rights violations in our supply chains and operations.

This Modern Slavery Statement is made by Auckland International Airport Limited (ARBN 085 819 156) ('Auckland Airport'), together with its subsidiaries, (the 'Auckland Airport Group'). It describes the actions Auckland Airport Group has taken to address potential human rights violations in our operations and supply chains during the financial year that ended 30 June 2024 (FY24).

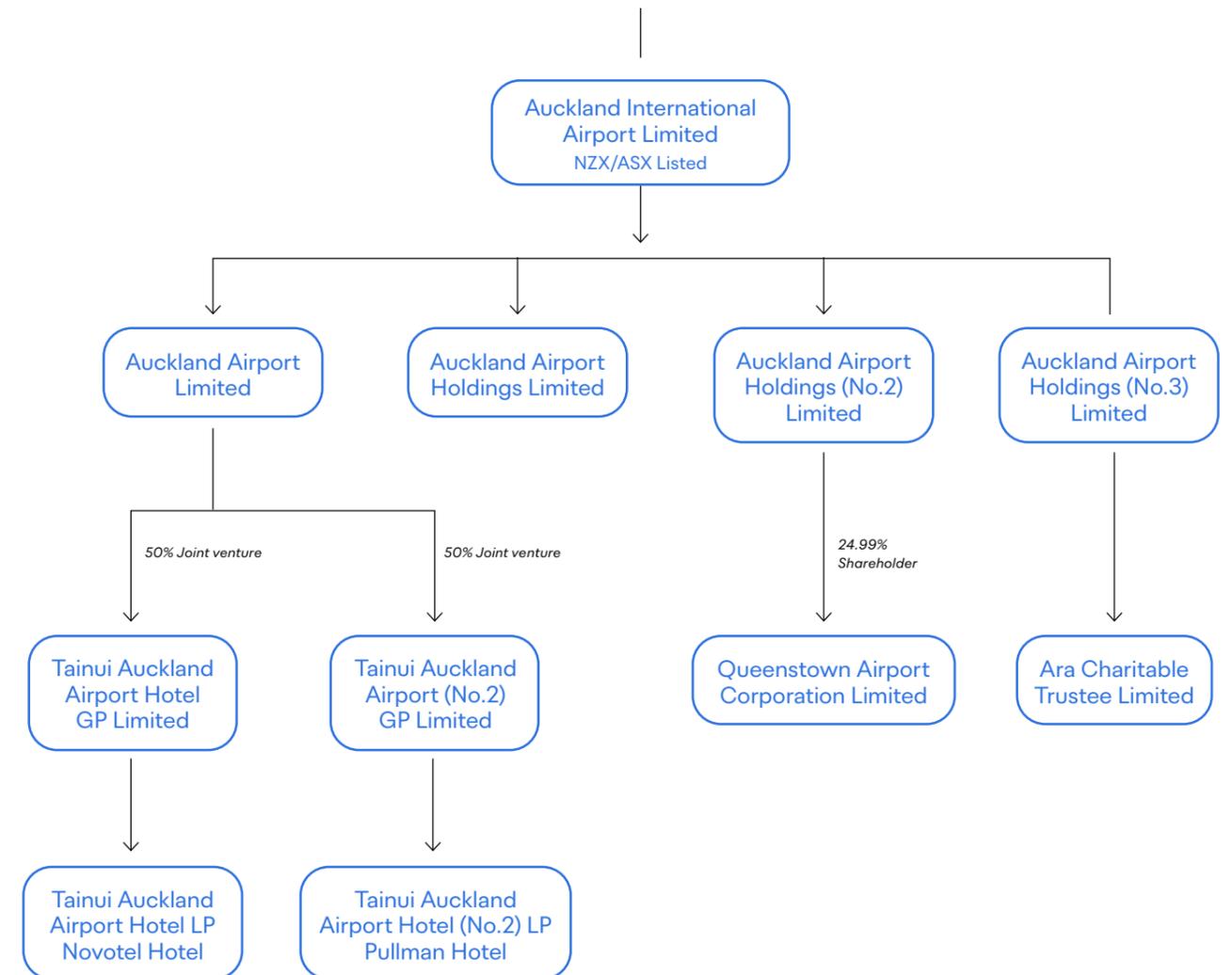
Structure, operations and supply chains

Our structure

Auckland Airport is a limited liability company, incorporated in New Zealand on 20 January 1988 and listed on the New Zealand Stock Exchange on 28 July 1998. Auckland Airport was registered in Australia as a foreign company under the Corporations Law on 22 January 1999, was granted Foreign Exempt Listing Entity Status by the Australian Stock Exchange on 22 April 2016, with its shares quoted on the Australian Stock Exchange effective 1 July 2002.

The structure of the Auckland Airport Group is set out below.

Auckland Airport company structure
As of 30 June 2024



Our operations

Auckland Airport is New Zealand's largest airport and a gateway to New Zealand.

In financial year 2024 Auckland Airport welcomed 18.5 million passengers, had 158,000 aircraft movements and connected Auckland to 42 international destinations and 23 domestic destinations.

Auckland Airport's key operations and revenue streams are aeronautical, consumer and investment property¹:

Aeronautical:

Auckland Airport is New Zealand's gateway airport, providing infrastructure and services to facilitate the movement of aircraft, passengers, and cargo.

Consumer:

Auckland Airport's consumer segment includes the provision of amenities for retail businesses both in the terminal and within the surrounding precinct. There are 101 retail tenants (across both the domestic and international terminal). Of these, 43 sell various goods and 39 are food and beverage retailers. The balance of services included baggage wrapping, foreign currency exchange, storage lockers and telecommunication providers. The wider precinct exclusive of freight, logistics and cargo consists of 9 hangars, 13 office tenancies, 15 food and beverage retailers, 11 services, 3 hotels, rental car operators and 1 events centre.

This segment of our business also includes the operation of car parking facilities and three hotels on the airport precinct, Te Arikini Pullman Auckland Airport, Novotel Auckland Airport and ibis Budget Hotel, as well as digital channels. These activities enhance Auckland Airport's customer proposition by providing important services in and around the airport that are valued by customers travelling through the precinct.

Investment property:

The investment property portfolio has grown strongly to over 550,000m² of managed and existing facilities ranging from logistics and

distribution warehouses to office buildings. The investment property portfolio is now valued at over \$3.12 billion, with an annual rental income of \$116.6 million. Auckland Airport owns approximately 1,500 hectares of contiguous land, with 151 hectares of this still available for development.

Auckland Airport is committed to sustainable infrastructure. In financial year 2024, Auckland Airport achieved Green Star rating (design or as-built) for the Transport Hub, Mānawa Bay and three properties in the Landing Business Park.

Auckland Airport workforce

As at 30 June 2024, Auckland Airport employed 746 people. Approximately 71% of our people are employed on individual employment agreements and 29% on collective employment agreements.

All of our employees are based in New Zealand² and recruitment is either undertaken by our internal People Experience Team or by external recruiters managed by our People Experience Team.

We have an outsourced model for many services, including construction, digital support, cleaning, property management, car park operations and maintenance, which are more fully described in the supply chain section. All recruiters, suppliers and consultants are bound by our Supplier Code of Conduct.

¹ For more detail, please refer to our annual report and financial statements available on our website

² We have one Contractor who is primarily based in China



Our purpose and sustainability

Auckland Airport is always working for New Zealand. Almost 60 years on, Auckland Airport still inspires and connects those with an adventurous spirit – a unique 1,566 hectare precinct of travel, enterprise and trade, entertainment, dining, shopping and hospitality.

By focusing on the pillars of our sustainability framework – Protect Planet, Empower People and Act Consciously – we're committed to creating enduring value and positive impacts. For more information visit: <https://corporate.aucklandairport.co.nz/sustainability>

Our values are: All in – Tātou Tātou, Know How – Kōkiri Tahi and Lets Go – Karawhina, and we expect our suppliers to share our values.

Our values are about how we collectively show up for each other and all our customer groups. They are central to Auckland Airport's culture and our people put them into action every day.

Being a sustainable business matters

Auckland Airport is committed to making a positive contribution through our business activities, operating in a way that creates enduring value for New Zealand generations to come.

Auckland Airport was one of New Zealand's early adopters of sustainability principles and has made considerable progress in the areas of emissions reductions, energy savings, waste management and social performance.

In 2024, we refreshed our sustainability framework to focus on three key pillars:

Protect Planet

- Climate
- Natural Environment
- Waste

Empower People

- Community
- Our people
- Wellbeing and safety

Act Consciously

- Governance
- Responsible supply chain
- Reporting and disclosure

By focusing on the pillars of our sustainability framework - through looking after our planet, empowering people and acting responsibly - we're committed to creating enduring value and positive impacts for our communities, economy and environment.



Supply chain

In FY24, Auckland Airport Group engaged directly with more than 1,020 suppliers from 24 countries, spending NZ\$1,260,000,000. Auckland Airport's supply chain is diverse and includes both direct and indirect suppliers.

What we source

Auckland Airport procures services and goods not for resale:

Services:

Includes construction services, building and grounds maintenance, roading services, car park operations, cleaning services, security, digital technology services, baggage system maintenance services, medical support, employee assistance, bus operations, passenger lounge operations, utilities, marketing services, recruitment, and training.

Goods not for resale:

Includes Personal Protective Equipment (PPE), uniforms, office equipment, CCTV cameras, display screens (FIDS), IT hardware, vehicles, airbridges, EV chargers and new airport infrastructure built on site by construction contractors including roads, taxiways, airfield aprons, upgraded runway slabs, utility networks (e.g. water, wastewater, gas, electricity, aviation fuel), airport terminals, car parking facilities and industrial, commercial and office rental properties.

Where we source from

Approximately 87% of our direct procurement spend³ was with New Zealand suppliers. Some of our suppliers are New Zealand entities, being a company that is resident in New Zealand for income tax purposes. Some, however, are head-quartered overseas.

Operational expenditure represented 10% of our direct procurement spend:

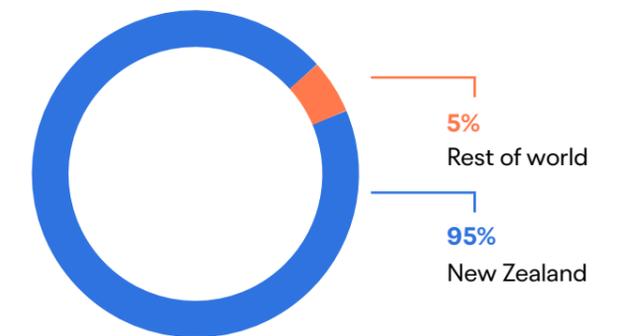
- Outsourced operations represented 60% of direct operational expenditure including: cleaning, security, passenger facilitation, parking related services, utilities, and building asset maintenance.

- IT operational costs represented 20% of direct operational expenditure across provision of IT operations, system support, and licensing.
- Activities such as corporate travel, health and safety supplies, marketing and promotion, professional services, office supplies, and compliance costs represented 20% of total operational expenditure.

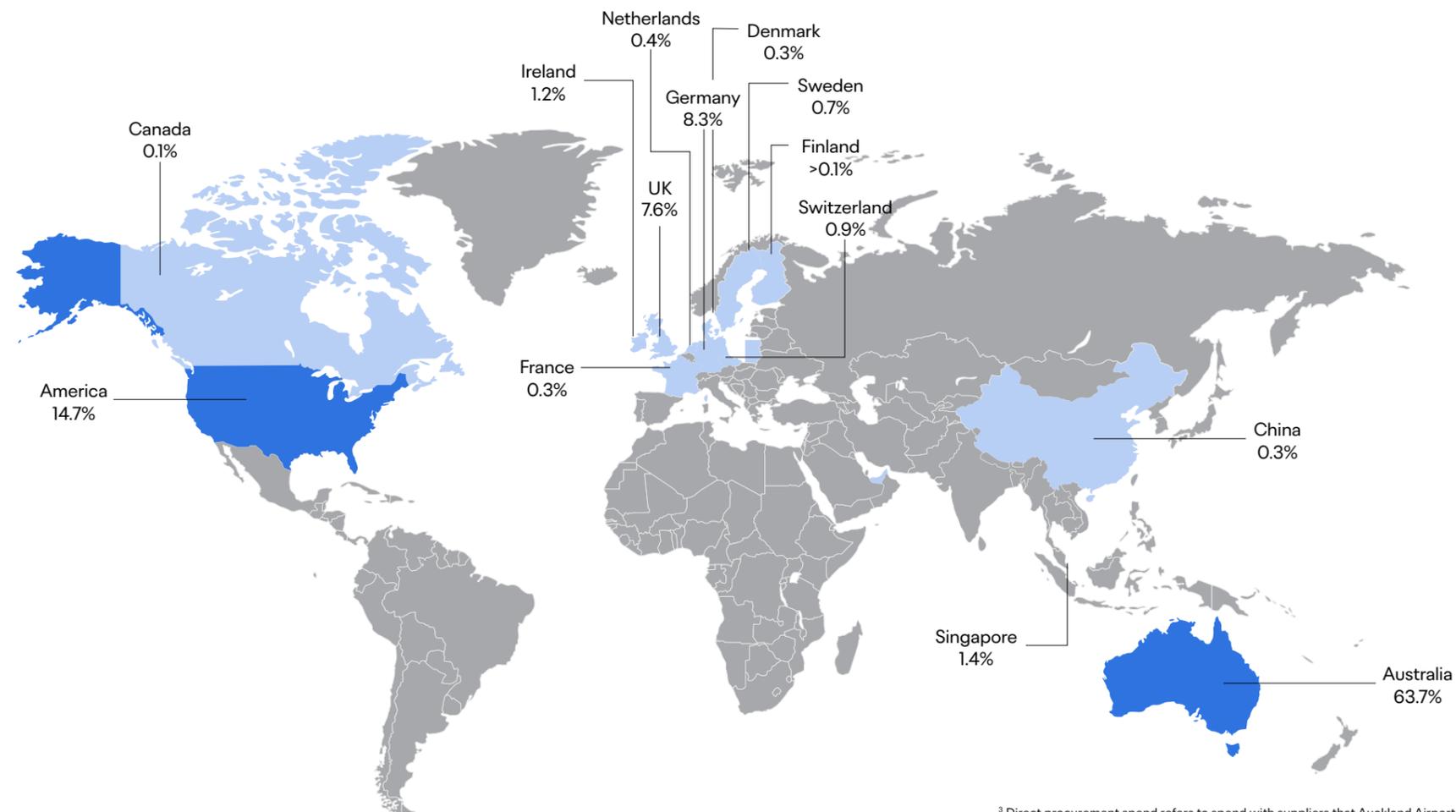
Capital expenditure represented 90% of our direct procurement spend including:

- Construction;
- Professional services;
- Construction related materials and equipment; and
- Technology systems and infrastructure.

Spend breakdown



Spend by country - rest of world summary



³ Direct procurement spend refers to spend with suppliers that Auckland Airport has a direct contractual relationship with

Policies and governance

Safety, sustainability and operational risk committee

Auckland Airport Board's Safety, Sustainability and Operational Risk Committee (SSORC) oversees our operational risks. SSORC has a specific responsibility to assist the Board to fulfill its corporate governance and responsibilities relating to health, safety and wellbeing, environmental

management, sustainability performance, modern slavery and operational risk management and compliance.

A number of policies, procedures and standards are in place to assist Auckland Airport in upholding and protecting human rights. These policies apply to directors, employees, contractors, and consultants. They also guide engagement with our suppliers.

The policies listed below (with the exception of the Procurement Policy and the Enterprise Risk Management Framework) can be located on Auckland Airport's Corporate Governance webpage.

Modern Slavery Policy

The Modern Slavery Policy details our commitment to identify, assess, prevent and remedy human rights violations across our business and within our supply chains. The policy underpins our business engagement practices and guides our engagement with suppliers.

Supplier code of conduct

Our Supplier Code of Conduct is guided by the core principles in the UN Global Compact, the United Nations Universal Declaration of Human Rights, UN Convention of the Rights of the Child and the International Labour Organisation Core Conventions. The Supplier Code of Conduct details guiding principles and expectations in relation to the business practices of our suppliers, including the expectation that the business practices flow into their own supply chains.

The Code is publicly available on our online procurement portal and referred to in all sourcing documents (e.g. Request for Proposal), contracts, and our Purchase Order terms and conditions.

Whistleblower policy

The Whistleblower Policy includes protections for all current, former and temporary employees, directors and all persons working for, on behalf of, or at Auckland Airport (including but not limited to) agency workers, volunteers, contractors, consultants, secondees and suppliers, who wish to raise concerns in relation to real or suspected human rights violations.

The policy documents Auckland Airports commitment to acting ethically by engaging in sound practices, respecting others and accepting responsibility for our behaviours, which are set out in the Ethics and Code of Conduct Policy. It also documents the process to raise any concerns to either the Independent Whistleblower Service or to Auckland Airport's Company Disclosure Officer.

Ethics and code of conduct policy

The Ethics and Code of Conduct Policy sets out the expectation of all Directors, employees, consultants and all other people when they represent Auckland Airport to act ethically by engaging in sound practices, respecting others and accepting responsibility for their behaviour.

Risk management policy

The Risk Management Policy sets out the role all staff have in risk management. While the Board has ultimate responsibility for reviewing and ratifying the risk management structure, processes and guidelines which are to be developed, maintained and implemented by Management, the active identification of risks and implementation measures are the responsibility of all staff. The policy is designed to promote a culture which ensures a proactive and consistent approach to identifying, mitigating and managing risk (including that of any real or threatened human rights violations).

Enterprise risk management framework (ERMF)

The Enterprise Risk Management Framework includes Auckland Airport's approach to risk management in relation to modern slavery risk.

Procurement policy

The Procurement Policy reflects Auckland Airport's commitment to best practice contracting and procurement principles, by detailing the governance and standards expected for procurement activities at Auckland Airport.

Sustainability policy

The Sustainability Policy defines the fundamental principles of Auckland Airport's sustainability approach and documents the commitment to operate in a reasonable and sustainable manner, delivering environmental, social and wider economic value to all stakeholders.



Identification of modern slavery risks in our operations & supply chain

Auckland Airport has identified the following potential modern slavery risk areas in its operations and supply chains.

Operations

Employment:

As all Auckland Airport employees are either directly employed by Auckland Airport or under a collective employment agreement, we consider this aspect of our business as having a low modern slavery risk.

Subsidiaries:

Two of the Auckland Airport Group subsidiaries are partial owners of hotel and airport entities that have operations in New Zealand. Having limited control reduces the oversight of the day-to-day operations of these entities, which could pose a risk of modern slavery, albeit Auckland Airport employees appointed to the boards of these entities are able to question management about these risks and demand corrective action if necessary.

Supply chains

Contractor risk:

While we usually engage New Zealand based suppliers in our capital projects, we recognise that those suppliers typically have suppliers of their own who, in turn, rely on other suppliers. This depth poses a risk of modern slavery practices due to the lack of transparency of our Tier 1⁴ suppliers' supply chains, so Auckland Airport is committed to constant engagement with our Tier 1 suppliers to identify and address potential risk.

A considerable portion of our operational expenditure is through engagement with New Zealand based suppliers for provision of outsourced services such as mechanical and electrical maintenance, cleaning, ground maintenance, and security but we recognise that many of these services rely upon the provision of low cost labour, so Auckland Airport intends to



continue to work with our suppliers to identify and address labour related risk through their supply chain over the next two years.

Use of off-shore vendors to deliver certain IT, marketing and consultancy services also present a risk of modern slavery to Auckland Airport.

Goods not for resale risk:

This area may also present a risk as items such as Personal Protective Equipment (PPE), uniforms,

office equipment, CCTV cameras, display screens (FIDS), IT hardware, vehicles, airbridges, EV chargers, will be influenced by the employment conditions where these products are made as well as the materials used.

Human trafficking:

We recognise that Auckland Airport is a major international gateway into New Zealand and a potential entry point for trafficked persons. We will continue to work with Government

agencies who are responsible for protection of our border and support them in their efforts in this regard.

⁴ Auckland Airport defines Tier One suppliers as those suppliers that directly supply goods, materials or services to our company and subsidiaries, while Tier Two suppliers and below are defined as those companies that supply goods, materials, or services to the supplier at the next higher level in the supply chain

Actions taken to assess & address modern slavery risks

Auckland Airport's actions to assess and address modern slavery risks is an area of continuous improvement.

In FY24 we continued to undertake steps to deepen our understanding and assessment of modern slavery risks in our supply chain. Auckland Airport has established a cross-functional working group to oversee Auckland Airport's ongoing obligations to manage modern slavery risks.

Supply chains

Auckland Airport recognises that our suppliers often have suppliers of their own who, in turn, rely on other suppliers. This layering poses a risk of modern slavery practices due to the lack of transparency of these supply chains. We are committed to working with our Tier 1 suppliers to identify and address this risk, including, where applicable, looking into the geographical location and nature of products and services sourced that may present greater modern slavery risks.

Software solution for supply chain monitoring

Auckland Airport engaged the services of third-party modern slavery assessment solution Informed 365 to issue modern slavery surveys to key suppliers. Where responses were hard to obtain Auckland Airport Procurement personnel reached out via phone call and emails to those suppliers for engagement in the survey. Responses are assessed based on Auckland Airport's criteria and allocated a risk rating so that Auckland Airport can better understand the nature, scale, and likely impact of modern slavery risk through its supply chain; and develop mitigation strategies as appropriate.

In FY24, we required key suppliers (which make up 75% of our total spend) to complete the survey, to ensure the suppliers with the contracts that have high risk profiles were assessed and allocated a risk rating.

Working with our suppliers:

Auckland Airport requires potential suppliers to complete a modern slavery questionnaire during a formal procurement process. All responses

are reviewed in order to benchmark a potential supplier's maturity of modern slavery and are recorded in a central database hosted by the Procurement team and are available for our staff to reference as required.

All of Auckland Airport's precedent contracts include a modern slavery clause which underpins the requirements for a contractor to warrant that it does not, and will not, engage in modern slavery practices. It further imposes an obligation on the supplier to report all instances of actual or suspected instances of modern slavery, and to provide ongoing training to its employees to identify instances of modern slavery. There is also an express requirement in Auckland Airport's procurement practices to oblige all suppliers to comply with our Supplier Code of Conduct.

Training and building awareness:

Auckland Airport appreciates that a large portion of the suppliers it engages with are New Zealand based suppliers who are currently not subject to compliance with modern slavery laws. Auckland Airport is committed to working with New Zealand suppliers to raise awareness of modern slavery and created a bespoke modern slavery guide to potential and current suppliers to assist with their modern slavery awareness and understanding of key supply chain risks.

Auckland Airport continues to provide modern slavery training to its key internal stakeholders. The training provides an understanding of modern slavery, how to recognise signs of modern slavery and the key risks and impacts to the business.

Auckland Airport will continue to work with both internal and external stakeholders to raise awareness of modern slavery, including providing annual refresher training.

Ethics and Code of Conduct and Whistleblower refresh

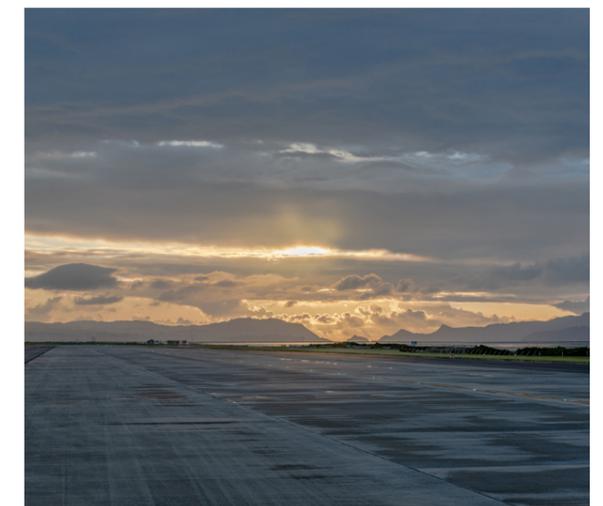
In financial year 2024 Auckland Airport refreshed its Ethics and Code of Conduct policy and Whistleblower policy and launched an independent Whistleblower service managed by PricewaterhouseCoopers. The policy was refreshed to permit all current, former and temporary



employees, directors and all people working for, on behalf of, or at Auckland Airport (such as agency workers, volunteers, contractors, consultants, secondees and suppliers) to confidentially report any concerns or actual or suspected breaches of the ethics and code of conduct policy. The refresh of the policies and the launch of the whistleblower service was communicated to all staff.

Human trafficking

Auckland Airport recognises the unique role it has to play in eradicating modern slavery in its capacity as being New Zealand's largest owner and operator of an airport, with millions of customers travelling through our terminals every year. Both the New Zealand Police and New Zealand Customs Service have significant representation on Airport to facilitate oversight of the human trafficking risk.



Assessing effectiveness of our actions

For FY24, assessing the effectiveness of each of the actions is summarised below:

- **Policies & procedures:** from a governance perspective, the Safety, Sustainability and Operational Risk Committee routinely reviews our risk position and effectiveness of policies and procedures in place to reduce and mitigate risk. Further, compliance with policies and procedures forms part of performance reviews for employees, contractors and relevant third parties. Particular to the Whistleblower policy, we record any receipt of, and responses to, complaints made under the whistle-blower policy in relation to human rights violations.
- **Supply chains:** ensuring we are working directly with our suppliers and recording receipt, awareness and adherence to our commitment to protecting human rights under our Supplier Code of Conduct.
- **Human trafficking:** recording incidence rates of potential or suspected human trafficking by keeping open lines of communication with New Zealand Government agencies to make sure there is transparency throughout immigration procedures and Auckland Airport is aware of any such incidences

Auckland Airport is not aware of any instances of modern slavery in its operations or supply chain. During FY24, no whistleblower reports were received in relation to suspected or actual modern slavery breaches.

Going forward

In parallel with the actions set out to mitigate any potential modern slavery risks in our supply chains, we plan to develop targets that will increase in sophistication to specifically measure our effectiveness in progressing towards a commitment of zero-tolerance to modern slavery and human rights violations.

Practical steps and targets for FY25

- To continue widening the use of the modern slavery software solution by assessing current and future supplier modern slavery risk levels.

- To ensure that anyone involved in procurement at Auckland Airport identifies potential risks before starting sourcing, we will include risk assessment for high-risk goods and services in key procurement planning documents.
- To prepare a Modern Slavery standard operating procedure documenting the process Auckland Airport will follow if modern slavery is suspected or identified in our operations or supply chain.
- To launch an Ethics and Code of Conduct training module and a Whistleblower training module available to all employees and contractors as part of the onboarding with Auckland Airport.
- To continue to educate all employees, directors and all people working for, on behalf of, or at Auckland Airport (such as agency workers, volunteers, contractors, consultants, secondees and suppliers) on the availability of the independent whistleblower services through campaigns.
- To review Auckland Airport's Enterprise Risk Management Framework (ERMF) to ensure that modern slavery risk is considered and addressed adequately.
- To continue to provide modern slavery training for new employees and contractors to complete as part of their induction, and ongoing 'refresher' training for existing employees and contractors who are involved in the management of supply contracts or sourcing activities. Auckland Airport will further advance training by launching a modern slavery training module.
- Review and update the Supplier Code of Conduct to provide suppliers with more robust expectations for Modern Slavery
- Undertake an assessment to identify Auckland Airport's Tier 1 highest risk supply categories.
- To continue to monitor regulatory and legislative trends in Australia and any consultation by the New Zealand government on a potential Modern Slavery Act.

To assess the effectiveness of our proposed actions, in FY25 we plan to:

- Report on modern slavery as an 'identified risk' to the Safety, Sustainability and Operational Risk Committee;
- Actively track the modern slavery training to ensure employees, contractors and consultants undertaking procurement activities have the requisite modern slavery risk awareness to be undertaking any business with suppliers.
- Report on the progress of the achievement of the practical steps and targets for FY25 bi-annually to the Safety, Sustainability and Operational Risk Committee.

Beyond FY25, Auckland Airport intends to track its performance and assess the quality and effectiveness of our actions by recording and reporting on the response rates to the Modern Slavery Supplier Questionnaire, monitoring the percentage of Auckland Airport employees undergoing modern slavery awareness training, monitoring the number of complaints received and remedied under Auckland Airport's whistle-blower policies, and continuing to encourage the reporting of any unethical behaviour or other wrongdoing.

Auckland Airport fully endorses the Modern Slavery Act and is committed to achieving a zero-tolerance approach to modern slavery through our operations and supply chains.



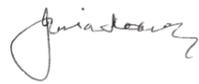
Consultation

Auckland Airport is committed to developing a robust and comprehensive response to modern slavery. The same policies, procedures and risk frameworks that are in place for Auckland Airport apply to the Auckland Airport Group. The Auckland Airport subsidiaries detailed in this document have directors that are all executive level employees of Auckland Airport. All directors of the subsidiaries have been consulted with in relation to this statement and are aware of their obligations in identifying, assessing and addressing risks posed by modern slavery to the entities they are directors of. All the directors of the subsidiaries have reviewed and endorse this statement.

This statement has been prepared in consultation with the cross-functional working group that work together to drive responsible procurement for Auckland Airport. It has been reviewed by our Chief Executive.

This statement was approved by the Board of Auckland International Airport Limited on 19 November 2024.

Signed:



Julia Hoare
Chair
Auckland International Airport Limited

