



Modern Slavery Statement

2025





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01 Overview



A letter from our CEO

On behalf of the Board of Airservices Australia, I am pleased to submit our Modern Slavery Statement for Financial Year 2025, which has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

On behalf of the Board of Airservices Australia, I am pleased to submit our Modern Slavery Statement for Financial Year 2025, which has been prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

Throughout the 2024-25 financial year, we continued our commitment to actively address modern slavery risks within our operation and supply chain. Since publishing our first statement in 2020, we have consistently worked to strengthen our ability to identify, evaluate, and mitigate these risks, while also assessing the effectiveness of the measures we implement.

We are dedicated to conducting our business responsibly, safeguarding the rights of our employees, contractors, supply chain partners, customers, and the communities where we operate. This commitment reflects our organisational values and our dedication to creating safe and inclusive workplaces, fostering relationships built on trust, respect, and collaboration, and ensuring every individual feels valued and empowered.

Work to further develop our anti-modern slavery program this year has further strengthened the foundations we have established in previous years. During the year we focused on ensuring the initiatives implemented in the 2024 financial year, progressed or were completed.

We refreshed our strategic objectives and continued to assess, prioritise and inform our program initiatives with best practice advice. This work ensures our program is fit for purpose and right sized for the future as well as being aligned to our organisation's performance objectives and goals.

Our Supplier Code of Conduct was published on our public website and supported our ongoing efforts to communicate more clearly with suppliers to help them understand the organisation's expectations of abolishing modern slavery in our operations and supply chain.

We continued to uphold our commitment to ethical sourcing, with modern slavery and human rights clauses embedded in our contracts. As part of our supplier onboarding process, all new suppliers are required to review and acknowledge our Supplier Code of Conduct through a registration questionnaire, ensuring all suppliers understand our expectations around responsible business conduct. Additionally, we commenced integration of modern slavery risk considerations into procurement processes and templates, and initiated a review of internal grievance mechanisms, both of which are scheduled for completion in FY26.

To strengthen our supply chain management, we continued to deepen our risk visibility across our procurement portfolios and embedded safeguards into core business processes. This was achieved via our annual risk assessment that was conducted across our Tier 1 suppliers, alongside a comprehensive review of supply chain risk covering our expenditure across 15 sourcing countries.

As part of our capability uplift program, we continued to raise awareness and education of our people around the risks of modern slavery through the ongoing training of all staff through our Modern Slavery Awareness e-Training module. Since the implementation of our e-Training module in May of 2024, 2,577 employees have completed the training with 1,493 employees undertaking the training in the 24/25 financial year.

Looking ahead, FY26 will focus on advancing our continuous improvement journey by embedding modern slavery risk management deeper within our organisation and procurement practices.

At Airservices we recognise that ending modern slavery requires ongoing commitment, transparency and collaboration and we remain dedicated to strengthening our policies, practices and partnerships to ensure respect for human rights across our operations and supply chain.

This statement was approved by the Airservices Australia Board on 2nd December 2025.



Rob Sharp
Chief Executive Officer
Airservices Australia



Looking ahead, FY26 will focus on advancing our continuous improvement journey by embedding modern slavery risk management deeper within our organisation and procurement practices.

Introduction

This Modern Slavery Statement has been prepared by Airservices Australia in accordance with the mandatory reporting criteria outlined in Australia's Modern Slavery Act 2018 (Cth). Airservices Australia does not own or control any other entities. Internal consultation was undertaken with key stakeholders across the organisation who are responsible for implementing and overseeing the modern slavery and labour rights program.

This is Airservices Australia's sixth Modern Slavery Statement, outlining the actions undertaken during the financial year ending 30 June 2025 (FY24/25) to identify, assess, and address modern slavery risks within our operations and supply chain.

Airservices complies with the Modern Slavery Act 2018. This Act requires entities based, or operating, in Australia, which have an annual consolidated revenue of more than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to address those risks.

The statement was reviewed by the Executive Performance Oversight Committee and subsequently endorsed by the Airservices Australia Board (the 'Board') prior to submission.

Recognising the complexity of modern slavery risks, Airservices Australia continues to adopt an iterative, multi-year approach aimed at deepening our understanding and strengthening our response to these risks over time.

Under Section 16 of the Act, entities must address the following in their statements:

- Identification of the reporting entity
- Description of its structure, operations, and supply chains
- Risks of modern slavery in those areas
- Actions taken to assess and address those risks
- How the effectiveness of those actions is assessed
- Consultation processes with owned or controlled entities
- Any other relevant information.

Since Airservices has no owned or controlled entities, the consultation requirement is limited to internal engagement, which is consistent with the guidance.

Our approach is grounded in risk management, and this statement serves as an opportunity to outline our methodology, highlight key actions taken, and reflect on future initiatives aimed at mitigating modern slavery risks.



We foster a respectful, diverse and inclusive workplace that is physically and psychologically safe. We promote reconciliation, and work to prevent any human rights violations, including modern slavery, resulting from our activities. As a key part of the aviation ecosystem, we continue to build partnerships in Australia and abroad.

Our commitment

We recognise human rights, in its simplest form, is about treating people, including employees, contractors, and supply chain workers, with dignity and respect.

'Service first', which incorporates serving our people and customers, is one of Airservices' core values. We are committed to building a culture that values safety, diversity, and inclusion, where everyone is treated fairly and with respect.



02 About us

We are Australia's air traffic management and aviation rescue fire fighting provider operating at 29 air traffic control towers and 27 fire stations across Australia, with more than 500 remote and regional sites.

In our vital role we manage 11% of the world's airspace, including the upper airspace for Nauru and the Solomon Islands.

Our people go above and beyond every single day to safeguard lives and livelihoods. **We connect people with their world safely** through our world-class services – linking families and friends, generating economic activity, creating jobs, and facilitating trade and tourism.

Airservices Australia acknowledges the Traditional Owners and Custodians of Country throughout Australia and acknowledges their continuing connection to land, waters, skies and community. We pay our respects to their people, cultures and Elders past, present and emerging.

This map names the Traditional Owner groups for each Airservices site across Australia.

We are committed to reconciliation and continue to build an organisation that is enriched through meaningful collaboration, engagement and alignment with Aboriginal and Torres Strait Islander peoples and the First Nations communities we work with across our vast national footprint.



Legend

- Air traffic towers 29 locations
- ▲ Aviation rescue fire fighting stations 27 locations
- Air traffic services centres 4 locations





Our operations

Our people are central to us delivering on our purpose to connect people with their world safely. With a diverse geographic footprint across city, remote and regional locations, we are committed to ensuring our workplaces are safe, inclusive and respectful.

We employ more than 3,700 people across Australia. As the principal civil air navigation service provider (ANSP) in Australia, we are home to air traffic controllers, aviation rescue fire fighters, engineers, technicians and trade specialists, as well as those working in enabling services functions. Our provision of both air navigation services and aviation fire rescue makes us unique globally.

Our workforce operates from 2 major air traffic service centres in Melbourne and Brisbane, as well as in 29 control towers and 27 fire stations at airports across Australia.



Air traffic management services

Focused on safe, predictable, and efficient air navigation services. We ensure that all aircraft make it safely to their destination when operating into, around and out of Australian aerodromes and in Australian-administered airspace.

This includes aeronautical information, radio navigation, and telecommunication services.



Aviation Rescue Fire Fighting (ARFF) services

Focused on being safe and effective aviation first responders. We are on stand-by to rescue people and property from an aircraft crash or fire, and from other fires and emergencies at 27 airports across the country.



Enabling services

Focused on providing the infrastructure and services necessary for frontline teams to succeed. These teams build and sustain the broad capabilities needed for high performance, through engaging with stakeholders, managing our workforce and facilities, establishing strategic suppliers, and delivering projects.



Engineering, technical and trade services

Focused on providing and maintaining air navigation technology and equipment critical to our aviation services at major and regional airports, aerodromes and airstrips. This workforce is critical in supporting new products, sites and services, through systems engineering, field technicians and network staff.

Worker profiles

Workers are engaged directly by Airservices, through subcontracting arrangements or through labour hire agencies.

Workers' arrangements are a mix of full-time, part-time or casual contracts. All workers are covered by Airservices policies when working on site, regardless of whether Airservices is engaging the worker through an intermediary.

Table 1: The types of workers Airservices engages

Worker	Role
Workers directly engaged by Airservices (full-time, part-time, casual)	Workers engaged through direct contracts to support with execution of business activities and other corporate functions
Labour hire	Workers engaged through third-party contractors to fill vacant positions within the full-time workforce
Non-FTE contractors (full-time, part-time, casual or seasonal)	Workers who are engaged via third-party contractors. These workers are captured in our supplier data as Tier 1 service providers

Table 2: Airservices worker roles

Job role classifications	Relevant roles include	Worker description
Specialised Services	Air traffic controllers; aviation rescue fire fighters; engineers	Workers have specialised training and certification. Some employees in specialised services undertake shift work.
Corporate Services	Corporate specialists: Human resources, communications and engagement, procurement, legal and governance, senior leaders; information and communication technology employees. Support Services: Administrative, security employees	Workers are typically highly skilled with tertiary education. Some support services workers have a range of levels of education and specialisation and undertake shift work.
Technical and Trade Services	Electricians; maintenance and repairs	Workers are engaged to supplement the existing workforce across each job role classification. Workers respond to short-term fluctuations in business needs.
Labour Hire & Subcontracting*	Cleaning; administrative or professional labour hire; security.	Workers are engaged to supplement the existing workforce across each job role classification. Workers respond to short-term fluctuations in business needs.

*Third-party labour hire and subcontracting is captured in our supply chain data as tier 1 service providers

Modern slavery risks in the aviation industry

Through the provision of Air Traffic Management services and Aviation Rescue and Fire Fighting services, we are a key player in the broader aviation industry. The aviation industry, comprising of airlines, airport operations and other air transport support services is exposed to modern slavery risk. Aviation connects the world, carrying more than four billion passengers a year, but this global network is also used by traffickers to transport people against their will.¹

Although the responsibility for identifying, apprehending, and prosecuting those perpetrating human trafficking rests with governments and their national law enforcement agencies, the aviation industry recognises that customer-facing staff can play an important role in helping to prevent this crime².

Airservices does not have direct interface with the customers of airlines and airports and most of our own customers are Australian-owned and operated airlines and airports. These customers are beholden to the Act and have anti modern slavery programs in place that they are required to report on annually. Additionally, the Airports Council International (ACI) and the International Air Transport Association (IATA) have emphasised their joint commitment and work to help combat human trafficking³ and is proactive in coordinating, establishing, and supporting anti modern slavery capabilities across the international aviation industry.

The international Civil Aviation Organisation⁴ (ICAO) has also worked in collaboration with the Office of the United Nations (UN) High Commissioner for Human Rights (OHCHR) to develop new guidance material, for cabin crew training at individual airlines. These combined initiatives from States, ICAO, IATA, ACI and several airlines are commendable and Airservices remains confident that the risk of modern slavery in our value chain is being addressed at an industry level and continually improving. Through our own initiatives we contribute to this progress.

Airservices Anti Modern Slavery Strategy

We believe in continuous improvement, to better assess and mitigate modern slavery risks in our supply chain and operations. This approach will create positive outcomes for both our business, people in our supply chain, our staff, and the community more broadly.

The strategic initiatives of our Anti Modern Slavery Strategy are aligned to pillars set out in leading modern slavery advice including the 'UN Guiding Principles on Business and Human Rights'. These pillars are outlined below.

Table 3: Modern slavery strategy pillars

Due Diligence Program	
Identify and assess risk	Identify areas of highest risk for modern slavery, and focus on mitigation efforts
Mitigate risks	Engage with areas of highest risk to develop and implement controls
Remediate	Identify negative impacts and provide remedy where these have occurred
Capability Uplift Program	
Governance	Integrate modern slavery into oversight and accountability functions
Strategy	Develop the approach by setting clear intention, direction and priorities
Capability	Upskill personnel across relevant business functions
Reporting	Transparently communicate modern slavery program to stakeholders

Identifying scope of business activities with modern slavery risks

Airservices acknowledges we play an important role in preventing modern slavery, especially given our size and over \$683 million in supplier spend each year (excluding GST). We take this responsibility seriously and focus on identifying and reducing risks in our operations and supply chain.

Historically, we used the United Nations Guiding Principles on Business and Human Rights and a third-party consultant to help us understand where modern slavery risks might exist in our business. The result included a detailed risk assessment to identify areas of concern and guide our next steps. This work helps us act responsibly to protect vulnerable workers across our supply chain.

The UNGP explains that businesses can be at risk of being involved in modern slavery and other human rights harm in three ways by:

Figure 1: Scope of modern slavery risks for assessment



Adoption of this approach is recommended by the Australian Border Force and set out in the *Modern Slavery Act 2018 (Cth)*: Guidance for Reporting Entities.

Table 4: Business activities and degree to which we may be involved in harm

	Business activity	Description of risk	Degree to which we may be involved in harm
Operations	Employment/ Workforce profile	There is a risk of modern slavery in our workforce, particularly in our indirect workforce of non-FTE contractors.	Cause
	Air Traffic Management services; Aviation Rescue and Fire Fighting services	There is modern slavery risk in the Global Aviation and Airport Management Industry. Airservices' services may be enabling these risks along the value chain. Customers may use our services for activities that involve modern slavery or do not adequately manage modern slavery in their own operations and services.	Directly linked
Supply chain	Procurement	There is a risk that we could purchase goods and services from a supplier who has used modern slavery in their creation or delivery.	Contribute to (Tier 1) / Directly Linked (Tier 2)

Modern slavery risk categories, definitions and underlying risk factors

Modern slavery refers to the potential for exploitation through the form of human trafficking, forced labour or child labour. Modern slavery risk factors refer to workforce or operational characteristics of a supplier or industry that may elevate the vulnerability of workers to modern slavery practices.

While the presence of modern slavery risk factors does not indicate the occurrence of a form of modern slavery, these risk factors elevate the inherent risk of modern slavery if they are not mitigated through governance and due diligence policies and procedures.

Table 5: Modern slavery risk categories, definitions and underlying risk factors informing inherent risk assessment

Risk Category	Definition
Child labour	<p>Where children are subjected to slavery or similar practices, or engaged in hazardous work (i.e. sex work, trafficking drugs, hazardous work that may harm their health, safety and morals).</p> <p>Underlying risk factors:</p> <ul style="list-style-type: none"> • Child labour
Forced labour	<p>Where the victim is either not free to stop working or not free to leave their place of work. Debt bondage is when a person offers labour in exchange for a loan, or to pay off debt inherited from a relative. These 'debts' are often inflated and attract such a high amount of interest that the labourer is unable to pay them off.</p> <p>Underlying risk factors:</p> <ul style="list-style-type: none"> • Employment type • Labour intensity • Level of regulation • Migrant workers • Presence of opaque intermediaries • Skill level • Subcontracted labour
Human trafficking	<p>The recruitment, harbouring and movement of a person for exploitation through modern slavery.</p> <p>Underlying risk factors:</p> <ul style="list-style-type: none"> • Employment type • Labour intensity • Level of regulation • Migrant workers • Presence of opaque intermediaries • Skill level • Subcontracted labour



03

Our supply chain

Modern slavery risks in our supply chain

To identify and assess supply chain risk, historically, Airservices conducted a review of its comprehensive modern slavery risk assessment across its Tier 1 supply chain.

In FY24/25, Airservices carried out its annual review of modern slavery risk classifications of its Tier 1 supply chain. This process helps us understand where risks may exist among our direct suppliers and guides the actions we should take to reduce the chance of modern slavery in our business. It's part of our ongoing commitment to responsible sourcing and protecting vulnerable workers.

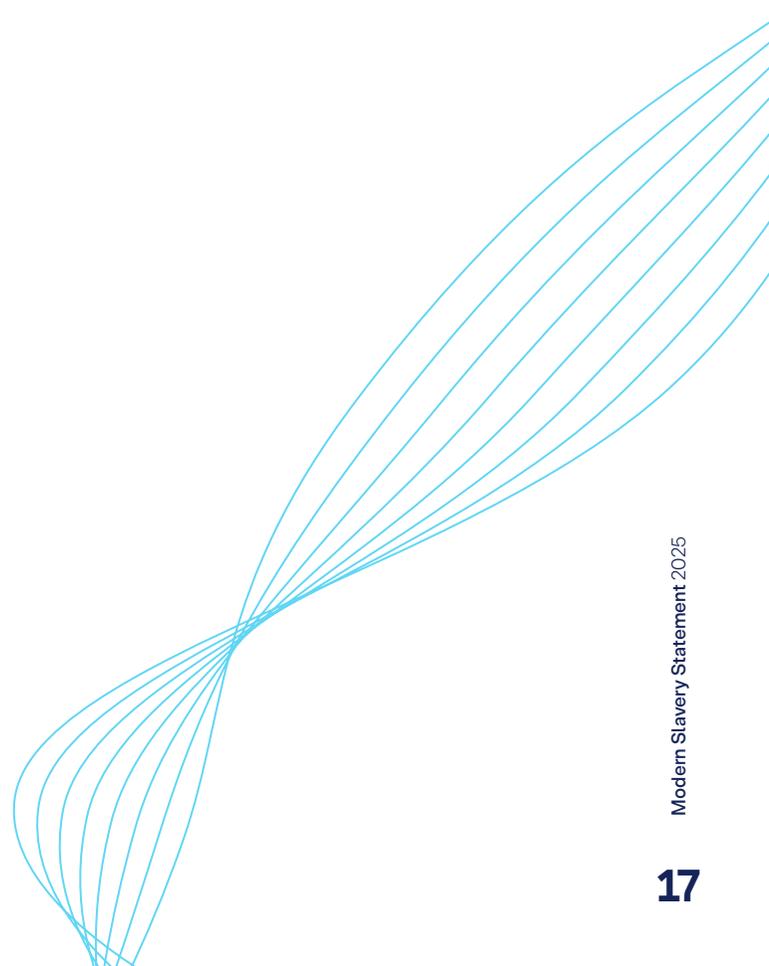
Tier 1 suppliers are the companies that contract directly with Airservices to provide goods or services. For modern slavery risk assessments, these are the initial suppliers we focus on because they have a direct relationship with Airservices.

The method of calculating the risk score for a Tier 1 supplier company is based on:

1. Supplier industry
2. Supplier country location, and
3. Airservices annual supplier spend.

At lower spend levels (around \$50,000), the risk score is closer to the country baseline (e.g. Australia = low). As spending increases towards \$3 million, the score shifts toward the industry risk (e.g., IT Consulting & other services = medium).

Modern slavery risk factors refer to workforce or operational characteristics of a supplier or industry that may elevate the vulnerability of workers to modern slavery practices.

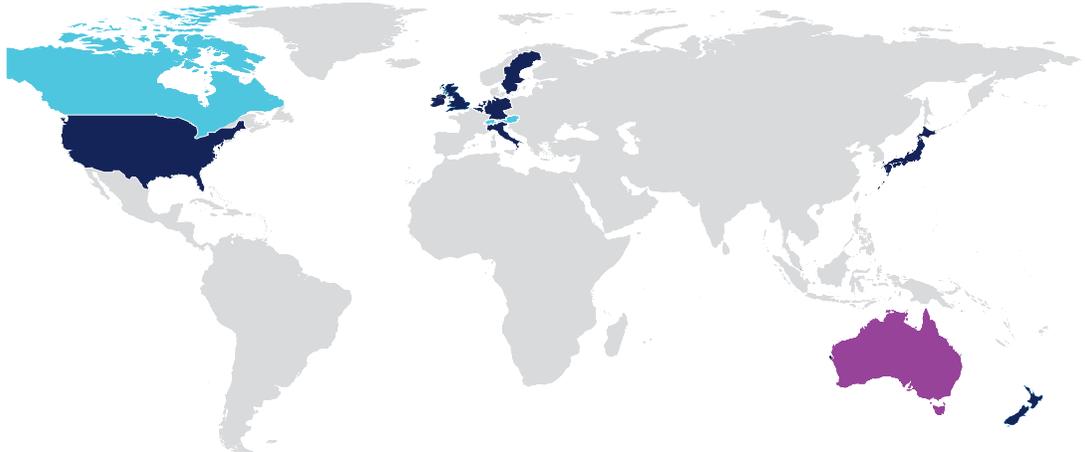


Tier 1 supply chain inherent risks

Maximum inherent risk by supplier location

The global map shows where assessed Airservices' Tier 1 suppliers are situated. The colour indicates the highest occurring maximum modern slavery risk level for any supplier in that country.

Figure 2: Maximum inherent risk by tier 1 supplier location



■ Low risk
 ■ Medium-low risk
 ■ Medium risk
 ■ Medium high risk



% listed for country indicates spend total

Maximum inherent risk profile by spend Tier 1 suppliers:

94% per cent of our Tier 1 supply chain by spend (and 96% per cent by count) has medium-low to medium-high inherent risk for modern slavery.

Table 6: Maximum inherent risk profile by spend Tier 1 suppliers

Maximum inherent risk rating	% of suppliers	% spend	Highest spend sub industries
Low	4%	3%	Legal services; other motor vehicle and transport equipment rental and hiring; higher education; technical and vocational education and training; other professional, scientific and technical services
Medium-low	33%	47%	Aerospace and defence; other professional, scientific and technical services; integrated telecommunication services; application software; engineering design and engineering consulting services; insurance brokers
Medium	55%	31%	IT consulting and other services; solid waste collection services; environmental and facilities services; security and alarm services; communications equipment; technology hardware, storage and peripherals
Medium-high	8%	16%	Construction and engineering; labour supply services; building and other industrial cleaning services; electronic equipment and Instruments; personal protective equipment manufacturing; hotels
High	0%	0%	N/A

Top inherent modern slavery risk types across Tier 1 supply chain

Historically, Airservices identified human trafficking as the most significant modern slavery risk in our direct supply chain. Around 8% of our suppliers were rated as having a medium-high risk. These suppliers work in industries such as cleaning services, labour hire, hospitality, health care supplies, PPE manufacturing, construction, and electronics. We use this information to focus our efforts on reducing risks and protecting vulnerable workers.

Graph 1: Top inherent risk types



Managing our supply chain

Airservices Australia operates a centre-led procurement function that supports the organisation in sourcing goods and services. Procurement activities are structured into two portfolios:

- Technology
- Infrastructure and corporate

Technology enablement portfolio accounts for 41% of total spend supporting operational teams primarily in air traffic management services, enabling services and engineering, technical and trade services.

Infrastructure and corporate portfolio accounts for 59% of total spend supporting operational teams in Aviation Rescue Fire Fighting (ARFF) services, facilities management, and engineering, technical and trade services.

Dedicated sourcing leads are responsible for market activity, stakeholder engagement and relationship management within their respective portfolios.

In FY24/25, Airservices procured a diverse range of goods and services from Tier 1 suppliers across 15 countries, with total expenditure reaching \$683 million (exclusive of GST).

Training and awareness building

Historically, we refreshed and enhanced a 3rd party modern slavery awareness training module to be fit for purpose for an organisation-wide audience. We rolled out our modern slavery awareness training midway through 2024 to achieve the following learning outcomes:

- what modern slavery is
- prevalence of modern slavery in Australia, the world and in organisations
- forced labour in organisations and indicators to watch out for
- modern slavery risks at Airservices
- staff role in addressing modern slavery.

Since the modern slavery module has been rolled out, the number of unique individual employee staff who have completed the training:

- since 22/05/2024 is 2,577
- during the FY24/25 period is 1,493

Sub-industries with the highest inherent modern slavery risks and types

Table 7: Sub-industries with highest inherent risk and types outlines the Tier 1 sub industries which we procure from that have the highest inherent risk in spend descending order. This is based on the highest type of modern slavery risk including human trafficking, forced labour and child labour. Includes 25% of total spend and 7% of total Tier 1 supplier count.

Reporting on program progress

We have documented the evaluated effectiveness of our actions in Table 10: FY25 Effectiveness measurement framework. Historically, we matured our ability to assess and monitor program progress and have used this framework to better report and update working groups and executives.

Modern slavery-related grievances and concerns reporting and management

There are various pathways within Airservices for concerns to be raised in relation to unacceptable conduct, including an independent ethics hotline which is available online 24/7 to report alleged misconduct. A dedicated sustainable procurement email address is published on the Airservices website as an additional channel for employees, suppliers, their employees, and subcontractors to confidentially report modern slavery-related concerns about improper conduct by Airservices, the supplier, or any other party in the supply chain without fear of retaliation or victimisation.

In FY24/25, no potential instances of modern slavery in our operations nor supply chain were reported.

Table 7: Sub-industries with highest inherent risk and types

Sub-industry and inherent risk profile	% of all suppliers	% total spend	Risks associated with Tier 1 procurement
1. Construction and engineering	2.1%	19.1%	Reliance on complex subcontracting arrangements obscuring lines of accountability for fair labour conditions, allowing employers, contractors or labour agents to exploit workers with limited repercussions. Vulnerable and/or migrant workers who are more susceptible to exploitation, e.g imposition of recruitment fees, underpayment of wages, excessive working hours and intimidation against union participation, language barriers, reliance on employers to maintain their visa status, fear of reprisal or deportation, and a lack of understanding of their labour rights in Australia ^{5,6}
2. Labour supply services	1.3%	4.4%	Reduced visibility over workers' conditions and vulnerable workers experiencing precarious employment and who may feel compelled to accept unfavourable conditions, e.g. underpayment of wages or excessive working hours. Concentration of migrant workers elevate risks around human trafficking, including deceptive recruitment practices, withholding identity documents or implicit threats of deportation to intimidate workers out of reporting labour violations. ^{7,8}
3. Electronic equipment and instruments	0.4%	1.8%	Forced labour and human trafficking is systemic in the production and provision of electronic equipment. Structural challenges in the industry are driven using temporary, part-time and subcontracted labour, often engaged through third-party labour agents. The use of migrant workers is significant, with recruitment fees leading to debt bondage common place. Workers typically operate in a manufacturing setting which is linked to excessive working hours and substandard worker accommodations. Electronic goods imported to Australia often originate from higher risk countries such as China and Malaysia. ^{9,10}
4. Building and other industrial cleaning services	0.2%	0.8%	High presence of migrants and low-skilled workers who are vulnerable to labour exploitation due to foreign workers' lower awareness of local labour rights or legal avenues, or barriers to advocating for fair treatment due to language barriers, concerns over migration status or job insecurity. Informal hiring practices or subcontracting resulting in challenges to monitor and enforce labour standards. Pressures to deliver competitively priced services may lead operators to undertake cost-cutting measures that compromise fair wages or working hours. ^{11,12}
5. Personal protective equipment manufacturing (PPE)	1.1%	0.4%	Labour exploitation and the abuse of vulnerable workers such as lower skilled, temporary, and migrant workers, e.g. excessive working hours, underpayment, deceptive recruitment practices and debt bondage via predatory recruitment fees, barriers to remediation pathways or precarious employment prospects. Use of labour agents or subcontracting to cut production costs to compete for price-sensitive customers. Offshore manufacturing locations in inherently higher risk countries, such as China, India and Malaysia. ^{13,14}
6. Electrical components and equipment	0.9%	0.2%	Forced labour is systemic in the production and provision of electronic equipment and component production in global supply chain. Structural challenges in the industry are driven using temporary, part-time and subcontracted labour, often engaged through third-party labour agents. The use of migrant workers is significant, with recruitment fees leading to debt bondage common place. Workers typically operate in a manufacturing setting which is linked to excessive working hours and substandard worker accommodations.

**Modern Slavery Risk Mitigation
– Advancing Organisational Maturity**

As part of our commitment to ethical sourcing and ESG leadership, Procurement Services is progressing toward a more mature and proactive approach to modern slavery risk management.

Key focus areas include:

Contractual safeguards: Embedding additional modern slavery clauses in all supplier agreements for due diligence and transparency in subcontracting.

Capability building: Training procurement and frontline teams to identify and manage risks

Supplier accountability: Documenting Supplier Code of Conduct and requiring transparency in sourcing and subcontracting

Risk-based due diligence: Prioritising high-risk categories (e.g. merchandise, outsourced services) for audits and assessments

Continuous improvement: Considerations requiring suppliers to complete risk assessments and implement corrective action plans.

These measures position Airservices to meet evolving regulatory expectations and stakeholder demands while strengthening supply chain resilience.

FY24/25 supplier risk mitigation activity

Throughout FY24/25, Airservices continued to uphold its commitment to ethical sourcing, with modern slavery and human rights clauses embedded in our contracts. As part of our supplier onboarding process, all new suppliers are required to review and acknowledge our Supplier Code of Conduct through the registration questionnaire, ensuring they understand our expectations around responsible business conduct.

Table 8: FY24/25 Risk mitigation activity

Mitigation activity	Results
Modern slavery clauses included in Airservices contract templates	75% of registered contracts have modern slavery clauses
Modern Slavery training available through eTraining for all staff	The number of unique individual completions FY24/25 :1,493
Supplier code of conduct acknowledgement in new supplier registration	FY24/25 included 173 new supplier registrations
Monitoring suppliers regularly through audits or check-ins	26% of Tier 1 high risk suppliers have registered a statement with Attorney General over the last 2 reporting periods

Modern slavery capability uplift activities

Improved modern slavery governance and policy

In addition to the governance structure outlined in past statements, additional capabilities have been introduced and policies updated.

Policy updates

Table 9: Our policies and procurement procedures

Policy	Purpose	FY25 update
Code of Conduct	The Code of Conduct ensures everyone is aware of and understands the expected standards of behaviour that apply to each of us and the people we work with. When we work together as required by our Code of Conduct, we can have confidence that our people will be safe and respected in the workplace and that those around us will do the right thing.	Updated in FY25
Respectful Workplace Behaviour policy	This Policy supports Airservices' commitment to satisfying its legal obligation under the Sex Discrimination Act 1984 (Cth) (known as a 'positive duty') to eliminate, as far as possible, sex discrimination, sexual harassment, sex-based harassment, conduct creating a hostile workplace environment on the ground of sex, and related victimisation replaces our Bullying, Harassment and Discrimination Policy.	Updated in FY25
Employee Grievance Board (EGB)	An avenue of independent dispute resolution where an employee has a grievance, and the relevant enterprise agreement sets out an EGB process.	No change in FY25
People policy	Outlines our focus to deliver safe, valued, efficient and innovative services that promote and foster aviation.	Updated in FY25
Supplier Code of Conduct	Communicates our ESG expectations of our own business, and of the suppliers' providing goods and services to Airservices. See below for more details.	No change in FY25
Procurement Manual	Applies to the procurement of all goods and services for Airservices Australia.	Updated in FY25
Contract Management Procedure	Focuses on the management of contracts for the delivery of goods and services from suppliers.	Updated in FY25

Evaluating the effectiveness of our actions

Airservices is committed to improving how we measure the impact of our actions to address modern slavery with a simplified set of metrics and key performance indicators (KPIs) to help us track progress and evaluate the effectiveness of our efforts over time.

Table 10: FY25 Effectiveness measurement framework

	Prioritised focus areas	Status	FY25 Output	FY25 Effectiveness	
Capability Uplift Program	1. Governance				
	1.1	Supplier Code of Conduct	Complete	Information for suppliers accessible through Airservices website.	Clearer communication of Airservices' expectations to suppliers and staff to promote decent work and abolish modern slavery in operations and supply chain
	2.Strategy				
	2.1	Refresh objectives to focus on practical implementation	In progress and ongoing	Fit for purpose, right-sized and risk-aligned modern slavery program initiatives continue to be assessed, prioritised and delivered and are informed by best practice advice	Ongoing improvement and maturity of Airservices' modern slavery program
	3.Capability				
	3.1	Ongoing training through all staff e-Training module	Ongoing	e-Training module available for all staff 1,493 staff completed training	Increased internal accountability and capability to implement our anti modern slavery and Due Diligence Program
4. Reporting					
4.1	Ongoing annual submission of Airservices' Modern Slavery Statement	Completed	Modern Slavery Statement submitted and compliant with all aspects of the Modern Slavery Act (2018)	Zero non-compliance with legislative requirements of the Modern Slavery Act	

	Prioritised focus areas	Status	FY26 Output	FY26 Effectiveness	
Due Diligence program	5. Identify and assess risk				
	5.1	Streamline procurement and tender processes across organisation to ensure consistent approach to incorporate modern slavery and human rights risks	In development	Procurement tender clause uplift includes guidelines on risk assessment of modern slavery and appropriate clause to include in the contract based on the assessed level of modern slavery risk	Proactive identification and assessment of risks at supplier selection stage of the procurement lifecycle
	6. Mitigate risk				
	6.1	Continue to incorporate modern slavery and human rights clauses in our contracts	In development	Uplift to contract clause based on the assessed level of modern slavery risk and due diligence in contract management plan	Clearer communication of Airservices' expectations to suppliers to promote decent work and abolish modern slavery in operations and supply chain
	7. Remediate				
	7.1	Continue to work through our process and approach to manage and develop an appropriate mechanism for modern slavery-related grievance	In development	Grievance mechanism and management procedure is being developed, incorporating leading principles into its design and processes aiming to leverage existing grievance management capabilities in the organisation	Collaboration with risk management and grievance mechanism management resources Additional channel to support the identification and management of modern slavery



04

Appendix

Appendix A

Mandatory reporting criteria of the *Modern Slavery Act 2018* (Cth)

This statement was prepared to meet the mandatory reporting criteria set out under the *Modern Slavery Act 2018* (Cth). Our report sections and alignment to the criteria are outlined below.

Modern Slavery Act criteria	Airservices response to reporting criteria	Further details	Page
Identify the reporting entity	This statement was prepared by Airservices Australia (ABN 59 698 720). The statement sets out actions taken during the 12 months ending 30 June 2024.	Introduction	6
Describe the process of consultation with any entities that the reporting entity owns or controls	Airservices has no owned or controlled entities. Consultation for the statement occurred within the organisation through key stakeholders related to the modern slavery.	Introduction	6
Describe the reporting entity's structure, operations, and supply chain	Airservices employs more than 3,700 people across Australia. As the principal civil air navigation service provider (ANSP) in Australia, we are home to air traffic controllers, aviation rescue fire fighters, engineers, technicians and trade specialists, as well as those working in enabling services functions. Airservices procures a wide range of goods and services from Tier 1 suppliers in 15 sourcing countries, with a total addressable spend of \$683 million (excl. GST).	About Airservices Australia	8
		Our operations	11
		Our supply chain	16
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	The inherent risk of modern slavery across Airservices supply chain is predominantly low to medium.	Managing our supply chain	20
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Airservices takes a risk-based approach to assessing and addressing modern slavery risk, including both inherent and residual risk profiling. We have established a set of policies and governance pathways to guide our operational staff, and to communicate our expectations of suppliers, including Supplier Code of Conducts	Modern slavery capability uplift activities	23
Describe how the reporting entity assesses the effectiveness of these actions	During FY23, Airservices developed an Effectiveness Measurement Framework to support measuring the impact of our actions. Framework implementation began in FY24 and will continue to be rolled out in FY26 and beyond.	Evaluating the effectiveness of our actions	24

Appendix B

Focus areas for FY25/26 and beyond

Airservices remains firmly committed to advancing its approach to modern slavery risk management as part of its broader governance and sustainability objectives.

Building on prior initiatives, the organisation is focused on maturing performance through enhanced risk identification, strengthened supplier engagement, and integration of best practices across operations. These efforts are aligned with our strategic pillars and designed to deliver continuous improvement, ensuring that our response to modern slavery risks remains proactive, robust, and future-ready.

Capability Uplift Program

1. Governance	1.1	Continue to embed the Modern Slavery Working Group in the Airservices' governance systems including better integration with the broader Sustainability and ESG programs of work and governance processes
	1.2	Continue to evolve and update the effectiveness measurement framework
	1.3	Integrate modern slavery risks within risk management processes
2. Strategy	2.1	Update modern slavery program of initiatives with a functional cross section of the organisation, with a focus on practical implementation and right-sized actions with clear accountabilities and measures of effectiveness
3. Capability	3.1	Ongoing training delivered to procurement and contract management personnel to reflect new processes and procedures
4. Reporting	4.1	Ongoing annual submission of Airservices' Modern Slavery Statement
	4.2	Continue to report on human rights and modern slavery in the Annual Report

Due Diligence Program

5. Identify and assess risk	5.1	Enhance implementation and consistent application of supplier risk screening practices and modern slavery model clauses into sourcing RFP documents and processes
	5.2	Track the performance of procurement and tender process
6. Mitigate risks	6.1	Continue to incorporate modern slavery and human rights clauses in our contracts
	6.2	Enhance supplier relationship and contract performance management processes to incorporate modern slavery considerations and support action plan development and monitoring commensurate to suppliers' risk level
	6.3	Consider industry partnerships to streamline supplier engagement with other industry stakeholders and engage with industry forums and NGOs
7. Remediate	7.1	Continue to work through our process and approach to manage and develop an appropriate mechanism for modern-slavery related grievance



References

- 1 International Awareness Training on Human Trafficking, 2018 ICAO Int
- 2 International Aviation Transport Authority (IATA) is the trade association for the world’s airlines, representing some 330 airlines over 80% of global air traffic. They support many areas of aviation activity and help formulate industry policy on critical aviation issues.
- 3 International Aviation Transport Authority (IATA)
- 4 The International Civil Aviation Organization (ICAO) is a United Nations agency which helps 193 countries to cooperate and share their skies to their mutual benefit.
- 5 “Property, construction and modern slavery: Practical responses for managing risk to people”, Australian Human Rights Commission
- 6 “Pathway to respecting human rights and addressing modern slavery risks”, Property Council of Australia
- 7 “Labour hire and supply chains”, Fair Work Ombudsman
- 8 Vulnerability, “Modern Slavery in Australia”, Walk Free Global Slavery Index
- 9 Table 1: Imports of products at risk of modern slavery to Australia, “Modern Slavery in Australia”, Walk Free
- 10 “Modern slavery exposed in big tech supply chains”, Informed 365
- 11 “Tackling modern slavery in PPE supply chains: a practical guide for public bodies”, Impactt Limited and the UK Home Office
- 12 “Modern slavery in cleaning supply chains”, Cleaning Accountability Framework
- 13 “Stitched with slavery in the seams”, Walk Free Global Slavery Index
- 14 “Tackling modern slavery in PPE supply chains: a practical guide for public bodies”, Impactt Limited and the UK Home Office



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