

Modern Slavery Statement

FY2024



ACKNOWLEDGEMENT OF COUNTRY

Boorloo Worlak Kornt kaadatj Wadjak moort
Noongar boodja-k wer baalabang kalyakoorl
noyinand Noongar boodja-k. Ngalak kaadatj
Noongar Birdiya koora-koora yeyi wer boordakan.

Perth Airport acknowledges the Whadjuk Noongar people as the Traditional Custodians of this region and respects their ongoing connection to this land. We pay our respects to Elders past, present and emerging.





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CEO Message

At Perth Airport, we are firmly committed to upholding human rights and mitigating the risks of modern slavery across our operations and supply chains. As a critical infrastructure asset and gateway to Western Australia, we recognise our responsibility to address these important issues.

This Modern Slavery Statement, our fifth annual update under the Modern Slavery Act 2018, details the actions we have taken in FY24 to identify, assess and address modern slavery risks. While no instances of modern slavery were identified during the year, we continued to strengthen our approach to managing these risks.

Through analysis of our supplier base, we targeted due diligence efforts on comparatively high-risk sectors such as cleaning, security, solar and construction. As we progress our multi-billion dollar investment program, including a new terminal and runway, we are embedding respect for human rights into these transformative projects.

Collaboration remains central to our approach. We engage closely with suppliers to strengthen their policies and processes for mitigating modern slavery risks, favouring continuous improvement. In FY24, we also partnered with the Australian Federal Police to deliver training for our frontline teams on identifying signs of exploitation, complementing the strong oversight from law enforcement agencies at our airport.

Looking ahead, we are dedicated to continuously enhancing our modern slavery risk management as we deliver sustainable growth and create value for stakeholders through the expansion of WA's critical aviation infrastructure. Respecting human rights is integral to achieving our vision.

Jason Waters
Chief Executive Officer



We aspire to make a meaningful economic, social and environmental contribution to the communities that we serve while ensuring fair opportunities for future generations.

Introduction



Perth Airport Pty Ltd (PAPL), the operator of Perth Airport, is a company limited by shares, incorporated and domiciled in Australia. It is a wholly owned subsidiary of Perth Airport Development Group (PADG). This is a joint statement for both entities.

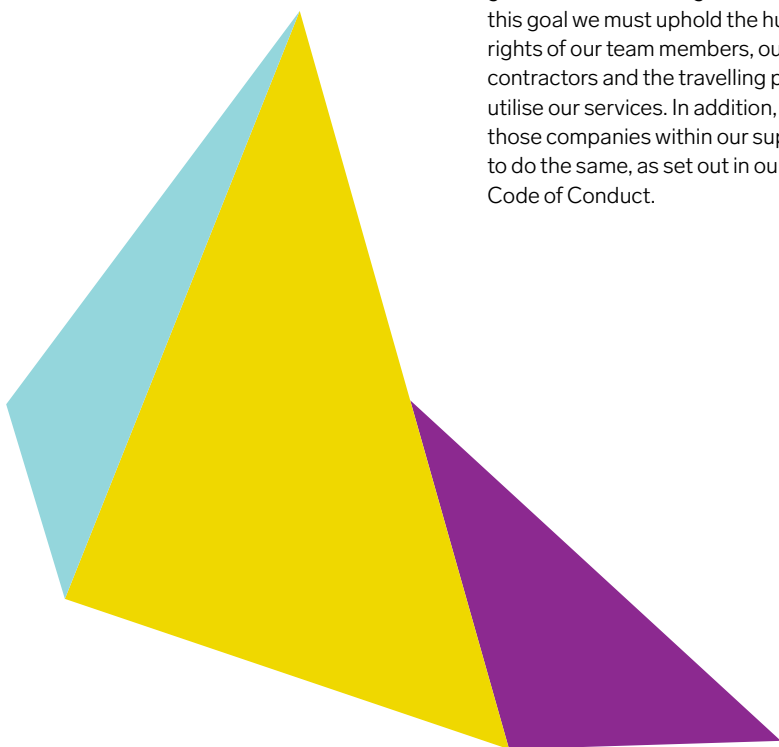
This statement is our fifth annual update, in accordance with section 13 of the Australian *Modern Slavery Act 2018* (Cth) (Act). It sets out the actions taken by PAPL and PADG to address modern slavery risks in our business and supply chain for the financial year ending 30 June 2024.

As a socially responsible organisation, we adopt the highest professional standards and comply with all laws, regulations and codes applicable to our business. We aspire to make a meaningful economic, social and environmental contribution to the communities that we serve while ensuring fair opportunities for future generations. We recognise that to meet this goal we must uphold the human rights of our team members, our suppliers, contractors and the travelling public who utilise our services. In addition, we expect those companies within our supply chain to do the same, as set out in our Supplier Code of Conduct.

We are committed to running our business ethically and responsibly. As part of our broader human rights program, this includes taking steps to continuously improve our practices to identify and address modern slavery which may occur within our business, supply chains and across our airport operations.

During FY24:

- No incidents of modern slavery were identified or reported to us, however, we acknowledge the need to remain vigilant in addressing modern slavery risks.
- No whistleblower reports received in FY24 related to human rights or modern slavery.
- It was determined that we have a low risk of modern slavery in relation to our direct team members.
- Using a third-party risk intelligence software solution to analyse our existing supplier base, we identified a number of suppliers that exhibited comparatively high modern slavery risk in their operations and supply chains. These suppliers are predominantly in the electronics, cleaning, security, solar and construction industries.



About Perth Airport



Perth Airport is Australia's western hub providing the people of Western Australia ("WA") with a critical link to the rest of Australia and the world. It operates 24 hours a day, seven days a week, and occupies a position as one of the most important infrastructure assets in Western Australia.

As the fourth-largest domestic and international airport in Australia by passenger volume, Perth Airport is serviced by more than 30 international, intrastate and interstate airline partners that operate to more than 100 destinations.

Perth Airport provides numerous economic, social and cultural benefits to Western Australians by connecting their communities to critical services such as health, education and employment. This not only strengthens cultural, family and social ties, but also supports tourism, education and leisure.

Perth Airport contributed more than A\$3.5bn to the Western Australian economy and generated nearly 17,000 direct and indirect jobs in 2018 and this is expected to grow to A\$9bn and approximately 37,000 jobs by 2040.

Perth Airport is majority owned by superannuation / pension and infrastructure funds (70%), while the remaining 30% is owned by Australia's sovereign wealth fund (Future Fund). This ensures a portion of the business profits are returned to ordinary Australians through investment in their super fund or via direct community investment..

OUR SUPPLY CHAIN

In FY24 we made purchases with more than 709 direct suppliers, with a large proportion being Australian suppliers. Our supply chain incorporates a wide range of products and services spanning a variety of industry sectors, broadly grouped as follows:

- Capital expenditure which represented approximately 60% of our procurement spend and includes construction activities, design consultancy and professional services.
- Contracted support services which includes security services to help keep our terminals safe and secure 24/7, cleaning, waste management & landscaping services to ensure our infrastructure is clean and hygienic, and baggage handling and aerobridge maintenance to maintain reliable operations.
- Information and communications technology (such as laptops, phones and CCTV) which are generally purchased from large multinational companies who supply us with finished products.
- Office supplies, uniforms, personal protective equipment & travel.
- Group Service Contracts (including statutory services, rent, rates, utilities, etc).



TEAM MEMBERS

We directly employ 397 people, the majority in permanent roles. Our employees are engaged by either a direct contract or under collective bargaining agreements. All employees are based in Australia and recruitment is managed by an internal People & Culture (P&C) team. For specialist roles, external recruiters may be used. When this occurs, they are overseen by the P&C team.

We consider we have a low risk of modern slavery in relation to our direct team members based on location and workplace environment. This is due to the strong regulatory environment in Australia, our adherence to Australian labour laws and robust internal hiring procedures that reflect the values set out in our Code of Conduct and are supported by our Equal Opportunities, Diversity, Anti-Harassment, accessible grievance mechanisms and remuneration policies. We understand that vigilance is important and ongoing training with team members will continue to ensure this remains the case.

Actions taken to assess and address Modern Slavery risks



POLICIES AND GOVERNANCE APPROACH

Strong governance is embedded within our business and is essential to our sustainable, long-term success, driving value creation and positive outcomes for our customers, stakeholders and shareholders.

We have a robust corporate governance framework in place, with the Board overseeing our broader Sustainability program which includes identifying, assessing and mitigating human rights issues (encompassing modern slavery).

Underpinning our governance framework are PAPL's suite of policies, several of which are relevant to modern slavery. This includes our Sustainability Framework, Code of Conduct, Procurement Policy, and Whistleblower Policy, all of which include provisions related to modern slavery and human rights.

Our Supplier Code of Conduct, which is available on our website, articulates our minimum expectations to suppliers on issues such as labour practices, human rights and modern slavery. Our Supplier Code outlines our governance framework including undertaking site-based reviews of supplier operations if required, working with suppliers to remediate if operations have fallen short of expectations, continuing to evaluate performance, and invoking audit and review powers to address specific concerns.

Our standard construction, services and consultancy contracts all require suppliers to comply with the Supplier Code of Conduct and modern slavery laws.

Perth Airport Board

Responsible for reviewing and approving Perth Airport's Sustainability Strategy 2022-2024 and our annual Modern Slavery Statement.

Safety, Sustainability and Security Board Sub-committee

Monitors the program of work and is responsible for reviewing the Modern Slavery Statement and recommending it to the Board for approval.

Executive Sustainability Steering Committee

Monitors the program of work and is responsible for reviewing the Modern Slavery Statement and recommending it to the SSSC for approval.

Sustainability Stand-up

Monitors the implementation of the Sustainability Strategy and Modern Slavery Program.

Cross Functional Accountability

Addressing modern slavery and human rights risks is a collective responsibility within PAPL. Various internal teams, including Governance, Risk & Legal, Procurement, Projects & Development, and People & Culture, collaborate closely to integrate our initiatives and underpinning processes.

ASSESSMENT OF MODERN SLAVERY RISK

Due diligence underpins our management of modern slavery risks and assists us in ensuring the ongoing alignment of our processes with the United Nations Guiding Principles on Business and Human Rights.


Our due diligence is an ongoing and iterative process of identification, prevention, and mitigation that considers both actual and potential adverse human rights impacts through our activities and our business relationships. For example, we identified a high-risk supplier in the security sector through our initial assessment. We then conducted a deeper audit, provided training to the supplier, and implemented corrective actions, demonstrating how our due diligence evolves from identification to mitigation.

Identification of High-Risk Suppliers

We have tailored our risk processes to ensure that we are focussing our efforts on those areas that present an elevated risk of exposure.

We utilise FRDM, a third-party risk intelligence software solution to analyse and monitor our existing supplier base.

FRDM is a platform designed to identify and quantify the inherent risks of human rights abuses across the complete supply chain, based on the following:

- Sector and industry risks.
 - Products and services risks.
 - Geographic risks.
 - Entity (supplier) risks.
 - Labour indicators.
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In addition, we have considered the continuum of conduct approach outlined in the UN Guiding Principles on Business and Human Rights. This continuum of conduct approach explains how a company may cause, contribute to, or be directly linked to modern slavery. For example, a company may 'cause' modern slavery through direct actions, such as employing forced labour in its own operations. A company may 'contribute' to modern slavery if its actions or omissions, such as pressure to meet unrealistic deadlines, indirectly lead to exploitation within its supply chain. Lastly, a company may be 'linked' to modern slavery if it is connected to another entity involved in such practices, even without direct involvement, such as sourcing materials from a supplier found to use forced labour.

The results from our analysis identified a number of suppliers that exhibited comparatively high modern slavery risk in their operations and supply chains. These suppliers are predominantly in the electronics, cleaning, security, solar and construction industries and are higher risk due to the factors listed above rather than due to historical misconduct.

Following a high-level overview and assessment of our supply chains, the following parts of PAPL's supply chain were deemed to exhibit comparatively higher modern slavery risk:

Cleaning and Security



Services such as cleaning, property maintenance and security are essential to our operations.

These services often exist in a price competitive market and may rely on low-skilled migrant labour.

This, in combination with the multiple tiers of contracting, creates preconditions for vulnerable workers to face modern slavery risks.

To mitigate these risks, we conduct due diligence, ensure suitable contractual arrangements, and pay appropriate fees that allow contractors to pay their workers fairly.

We recently completed a deep dive 3rd party audit into our security contractor which did not raise any concerns.

Construction



The construction industry typically involves long supply chains and low-skilled, low-paid manual work, which increases the risk of modern slavery.

Our infrastructure projects take place in Australia, where risks are lower, and we mitigate these risks through due diligence and contractual safeguards. Our procurement process also includes evaluation criteria beyond price, such as business integrity, technical capability, sustainability, health and safety standards, and approach to modern slavery risk management.

In addition, the supply chain comprises a significant number of raw materials and components that go into a project. There is a risk of being directly linked to modern slavery through the sourcing of raw materials and we are working with suppliers to understand how they mitigate this risk.

Electronics



The information and communications technology sector is globally recognised as high risk for modern slavery due to the complexity of supply chains, the prevalence

of subcontractors, and inconsistent oversight across different jurisdictions.

Manufacturing often takes place in locations with minimal regulation, where workers have limited resources for resolving grievances.

Many workers in electronics supply chains are migrant workers, who are particularly vulnerable due to limited legal protections, language barriers, and lack of access to grievance mechanisms.

In addition to operational risks, there are significant issues with raw materials, such as the risk of conflict minerals and child labour in producing critical components like cobalt.

Therefore, there is a risk that our purchase of electronic devices, including computers and mobile phones, could contribute to or be linked to modern slavery practices.

Solar Panels



An emerging risk in our supply chain is related to the procurement of solar panels. Generating green energy is central to our Sustainability strategy, and our aim for Net Zero Emissions for Scope 1 and Scope 2 by 2040.

However, there are concerns about modern slavery in solar panel manufacturing, particularly in sourcing raw materials like polysilicon.

As of this report, we are in the final stages of procuring a solar farm. A large part of the procurement process involved verifying that the supplier maintains robust systems to prevent modern slavery and adheres to recognised industry certifications. This included being able to provide a Certificate of Origin, Traceability audit documentation, and demonstrating that they conduct comprehensive Factory Audits using the SEDEX protocols.



Self- Assessment Questionnaire / desktop review

Supplier self-assessment questionnaires (SAQ) are sent to selected suppliers in high to medium risk categories, requesting information about their modern slavery processes, including labour policies, grievance mechanisms, and monitoring practices. This allows us to understand the robustness of their measures to prevent modern slavery and ensure compliance with our standards.

The results of these SAQs were reviewed through a comprehensive desktop review to assess the maturity of suppliers' approaches to modern slavery, including evaluating adherence to industry standards, implementation of best practices, and the effectiveness of grievance mechanisms and corrective actions. This is done on a rolling basis to ensure continuous monitoring and improvement

During the year we undertook desk-top audits of 27 suppliers.

Focused supplier evaluation

In FY23, PAPL commissioned an independent auditor to audit our security service provider due to the critical role of security services. An independent audit was chosen to ensure objectivity and provide an unbiased evaluation of the security provider's practices. The security provider has been key to PAPL's safety, providing personnel and technology to secure our premises. The audit included desktop audits, payroll examinations, and employee interviews to assess labour practices, work standards, policy awareness, grievance mechanisms, payroll verification, and modern slavery risk response. The audit confirmed the supplier had management practices to address modern slavery risks, with documentation meeting PAPL's expectations. Modern slavery awareness among frontline staff was identified as needing improvement. In FY24, the Australian Federal Police provided training to help staff identify and support individuals at risk of modern slavery and human trafficking.

In FY24, PAPL commissioned an independent assessment of a critical supplier working on a key infrastructure project to evaluate their modern slavery risk management practices. The assessment aimed to provide an objective understanding of the supplier's commitments, systems, and processes regarding modern slavery. Positively, the supplier demonstrated a commitment to addressing modern slavery by developing a Modern Slavery Policy and foundational procedures. The assessment identified areas for improvement, such as enhancing awareness, implementing a systematic risk assessment approach, and strengthening grievance mechanisms. Recommendations were provided to help uplift their practices, supporting continuous improvement in modern slavery risk management

Working with Suppliers

Generally, we find that suppliers who are subject to the provisions of the Act have mature approaches in place to identify and mitigate the risks of modern slavery. These mature approaches include detailed risk assessments, formalised training programs, and third-party audits to ensure compliance and continuous improvement.

However, we recognise that the Act does not require small to medium companies to complete an annual modern slavery report, nor do they necessarily have the resources to invest in the kind of compliance processes, systems, and people which a larger organisation might. These companies generally have few formal controls, policies or commitments to modern slavery and are less likely to be able to identify its presence or address the risk of modern slavery in their operations and/or the operations of their suppliers.

In these cases, we take appropriate and reasonably practicable actions including working with suppliers to strengthen their internal policies and procedures and by providing actionable and practical feedback and direction to resources. We continue to monitor and assist these suppliers until their maturity improves.

We favour working with suppliers to resolve or substantially mitigate issues instead of ending the relationship with the supplier because it could adversely affect the livelihoods of the employees.



REMEDIATION

Remediation in a human rights context is about 'putting things right' for the individuals experiencing a human rights breach. As the circumstances surrounding a modern slavery incident are likely to be unique, a response will be determined on a case-by-case basis and may involve a business process change, an education campaign or corrective action.

We have established reporting procedures and mechanisms where team members and third parties can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery or human trafficking.

Team Members can report to their manager, or if they wish to remain anonymous, team members and third parties are able to report through our independently operated Whistleblower system, via phone, email or an online portal.

Investigations will be undertaken with care and where substantiated, we will report to our Board and take appropriate action.

HUMAN TRAFFICKING

We recognise that Perth Airport is a major international gateway into Australia and a potential entry point for trafficked persons. Both the Australian Federal Police and the Department of Home Affairs have significant representation on airport to facilitate oversight of this human trafficking risk. In addition, we continue to raise awareness with our front line staff and contractors to spot the signs of potential human trafficking.

TRAINING

Training and awareness are crucial in addressing the risks of modern slavery and human trafficking. We recognise the need to build the capability of our team members, particularly our procurement practitioners/project managers and our front-line team-members, to identify potential red flags of modern slavery and human trafficking and the actions required to respond appropriately.

We have developed a training module to help build their awareness of global modern slavery and human trafficking so team members are in a better position to understand, identify and report incidents. Almost all team members completed this training during this reporting period and it is mandatory for new team members.

In FY24, the Australian Federal Police provided training front-line staff and security personnel on the important role airport workers can play in identifying people at risk of modern slavery and human trafficking as they pass through the terminals.

Finally, in FY24 we developed an education platform on our intranet, which can be accessed by Team Members. It also includes the results of the SAQs for easy tracking.

Effectiveness

We measure the effectiveness of our actions by:

- reviewing the number of responses from supplier questionnaires in relation to modern slavery and labour hire practices;
- assessing the number and types of actions taken to work with suppliers to improve their capacity to respond to modern slavery risks and whether their performance improves;
- ensuring our supply chain remains under constant review;
- monitoring and actioning in a timely manner any cases reported through our Whistleblowing Policy and through our confidential reporting service;
- employee completion rate of training module; and
- reviewing our modern slavery mitigations against best practice.

Consultation



PAPL is the operator of Perth Airport and holds all employee and supply chain relationships. Therefore, the issues discussed in this statement apply for the main part, solely to PAPL. PADG is the holding company of PAPL. As both entities share the same directors, consultation was not required.

Continuous improvement

We are committed to a program of continuous improvement to ensure that our efforts to identify, assess and address modern slavery are effective. A range of additional actions have commenced, or are planned, and will be reported in subsequent statements.

These include the below activities:

- Ongoing review and enhancement of modern slavery framework, risk management processes and associated policies.
- Providing meaningful feedback to all suppliers who complete our supplier assessment, where required.
- Continuing a focused supplier evaluation program for high-risk suppliers, with the next review being our solar farm procurement.
- Continued and proactive supplier engagement relating to modern slavery practices, thereby improving overall transparency relating to labour and human rights practices.



**THIS STATEMENT WAS APPROVED BY THE
BOARD OF PERTH AIRPORT PTY LTD**



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