

## MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDING 31 MARCH 2024

This statement is a joint statement made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**). This statement is made on behalf of the following companies within the Emirates Group in relation to the financial year ending 31 March 2024 (**RP24**):

- (a) Alpha Flight Services Pty Ltd t/as dnata Catering & Retail ABN 89 064 142 418;
- (b) dnata catering Australia Subsidiary 2 Pty Ltd ABN 34 003 836 440;
- (c) dnata catering Australia Subsidiary 1 Pty Ltd ABN 35 003 530 685;
- (d) Snap Fresh Pty Limited ABN 55 092 536 475; and
- (e) Alpha-ATS Pty Ltd ABN 98 094 789 796.

Together, these reporting entities are referred to as **dnata Catering & Retail** (or 'we', 'us', or 'our').

### 1 ACKNOWLEDGMENT OF COUNTRY

dnata Catering & Retail acknowledges the Traditional Custodians of the lands on which we operate throughout Australia. We pay our respects to Elders of Aboriginal and Torres Strait Islander communities past and present and extend that respect to all members of those communities.

### 2 OPENING STATEMENT

This is dnata Catering & Retail's third modern slavery statement and it is published in accordance with the *Modern Slavery Act 2018* (Cth). It outlines the approaches we have taken to identify, prevent, mitigate, and address risks of modern slavery that may occur within our supply chain, or which are directly linked to our operations.

Modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services. Modern Slavery includes criminal activity, gross violations of fundamental human rights, and it is a genuine concern for dnata Catering & Retail, and the Emirates Group globally.

Recognising that every area of its operations and supply chain has the potential to be impacted by modern slavery, the Emirates Group has implemented an [Anti-slavery and human trafficking policy](#) for the prevention, detection and reporting of modern slavery in all aspects of its business operations and supply chain.

At dnata Catering & Retail, and across the Emirates Group, we are committed to the highest ethical standards and responsible business practices because it's the right thing to do and it powers our success. Together with safety, it forms the bedrock of our identity and influences our decisions and actions. In an industry where trust is a vital business value, maintaining integrity is more than just compliance – it's about leading with conviction, establishing benchmarks for responsible business conduct, and building trust in our brand. We expect the same commitment from all our contractors, suppliers and other business partners.

We are proud of the journey we are on at dnata Catering & Retail to address the risk of modern slavery practices within our operations and supply chain, but acknowledge that much remains to be done, and there is no single solution to preventing all forms of modern slavery practices. dnata Catering & Retail will continue to work with our suppliers and other partners, and as part of the broader Emirates Group, with a common focus on protecting and promoting the human rights of workers.

### 3 ORGANISATION'S STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### 3.1 ORGANISATIONAL STRUCTURE

- (a) The dnata Catering & Retail companies are owned by dnata Catering Services Limited (a UK company) and specialise in the provision of flight catering services, and ready-made meal manufacturing in Australia. You can learn more about each of the components of the dnata Catering & Retail business on our website, accessible [here](#).
- (b) dnata Catering & Retail, together with dnata Catering Services Limited, also forms part of the broader dnata group of companies (**dnata**), which is collectively one of the largest air services providers in the world, serving over 300 airline customers in 37 countries. Its main activities include ground handling, cargo, travel, and flight catering services.
- (c) dnata, together with dnata World Travel, Emirates, and all their subsidiaries form the Emirates Group, whose head office is in Dubai in the United Arab Emirates.
- (d) The Emirates Group is an international organisation with business interests in the aviation, air services, education, retail, travel and hospitality sectors. You can learn more about the Emirates Group on our website, accessible [here](#).

## 3.2 OPERATIONS

- (a) The operations of dnata Catering & Retail consist of fourteen commercial aviation catering centres at airport locations around Australia, an airport terminal lounge at Melbourne, and a ready-made meal manufacturing facility located at Brisbane. These operations are supported, directed and managed by a centralised common management structure, and common boards of directors.
- (b) We are the leader in the Australian market for flight catering and ready-made meal services. To this end, we must master logistical complexities, time sensitivity, safety, and security considerations as well as a large and diversified work force every day.





**16**

catering facilities across 10 cities



**4,000**

people



**65 million**

meals each year



**250,000**

flights served each year

Our group of diverse brands enable us to deliver extensive service capabilities.

**dnata**  
catering & retail

Creating fresh award-winning meals and delivering outstanding service, dnata catering & retail is Australia's leading inflight catering and retail company.

**snappfresh**

Australia's leading manufacturer and exporter of readymade meals, we deliver an extensive variety of high quality and export-certified products to suit diverse needs and preferences across Asia Pacific.

**marhaba**

marhaba is a unique pay-as-you-go lounge accessible to all airline passengers travelling internationally out of Melbourne.

### 3.3 SUPPLY CHAIN

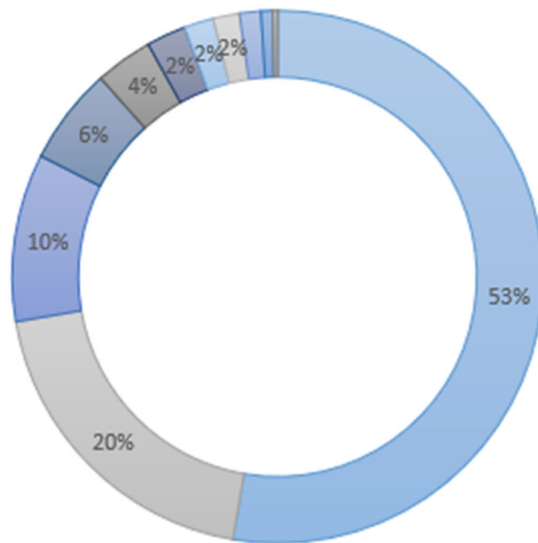
#### 3.3.1 Who are our Suppliers?

- (a) dnata Catering & Retail procures goods and services through a diverse global supply chain. Most of our procurement is managed by our centralised procurement team, which supports a consistent approach to modern slavery risk management in relation to our suppliers.
- (b) Where our food comes from matters to our airline customers, their passengers, the communities we operate within, the environment, and it matters to us. dnata Catering & Retail has been committed to collaborating with and supporting Australian food producers for more than 30 years. During RP24, approximately [80% of the fresh produce used in the meals we produce was sourced from suppliers right here in Australia](#), this includes beef, chicken, milk, eggs, fresh produce (fruit & vegetables).
- (c) Our beef, poultry, and pork suppliers' primary processing plants are annually audited by independent third-party auditors from AUS-MEAT, and our fresh chicken products are sourced from RSPCA Approved Farms.
- (d) In RP24, our direct global supply chain consisted of approximately 1,135 direct suppliers. Across these suppliers, just [over 40% of our total spend was concentrated with our top 10 suppliers](#).
- (e) This concentration of spend with a smaller number of long-term key suppliers has supported dnata Catering & Retail to build strong, long-term relationships, which assists us to better assess and address a range of risks associated with our supply chain.

#### 3.3.2 What do we procure?

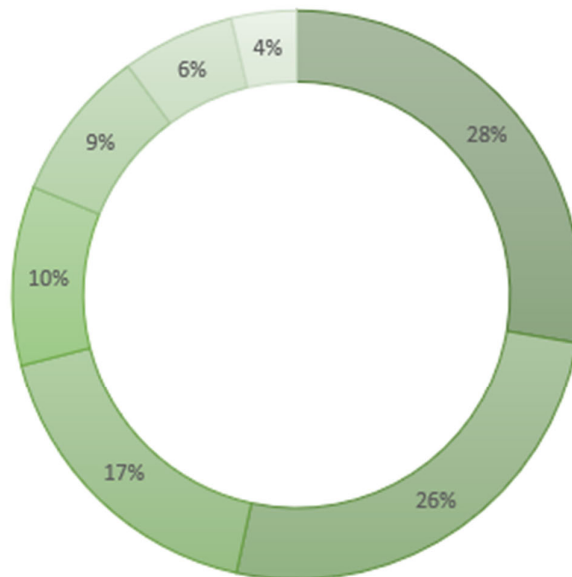
- (a) The graphics below summarise our procurement footprint during RP24, including by identifying the key categories of our total spend and a further breakdown of our spend on food:

### Share of Total Spend



- Food & Beverage
- Labour
- Property
- Professional Services
- Logistics
- Packaging
- ICT
- Fleet
- Equipment & Machinery
- Uniforms & PPE
- Other

### Share of Food Spend



- Shelf-stable (Ambient) food
- Proteins
- Fruits & Vegetables
- Dairy
- Bread & Bakery
- Beverages
- Ready to Eat

We monitor this information to support and deepen an understanding of our changing modern slavery risk profile.

#### 4 ASSESSMENT OF MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAIN

dnata Catering & Retail actively assesses the ethical dimensions of our business activities and partnerships, as we recognise that overlooking the ethical dimension of the decisions we make can result in harm to vulnerable third parties, as well as serious legal, financial, and reputational harm to dnata Catering & Retail itself. This assessment activity includes supplier vetting, transparent financial reporting, and fostering a culture where issues of ethics and respect for human rights can be openly discussed and resolved.

We recognise that the United Nations Guiding Principles on Business and Human Rights (*UNGPs*) are the authoritative global standard for how businesses should meet their responsibility to respect human rights, and that addressing adverse human rights impacts requires businesses to take adequate measures for their prevention, mitigation and, where appropriate, remediation.

To identify, prevent, mitigate and account for how we address the adverse human rights impacts from our operations and supply chain, dnata Catering & Retail recognises that it should assess both the **actual** and **potential** adverse human rights impacts that it may:

- **CAUSE:** Our actions or omissions may directly result in modern slavery occurring. For example, an air services provider could potentially cause modern slavery if it intentionally subjected workers to serious exploitation, such as debt bondage or forced labour.

dnata Catering & Retail assesses this risk to be [very low](#) for the reasons described at Paragraph 4.1 below.

- **CONTRIBUTE TO:** Our actions or omissions may contribute to modern slavery where they significantly facilitate or incentivise modern slavery to the extent that the exploitation would have been unlikely to occur without them. For example, an air services provider could potentially contribute to modern slavery if it sets a deadline for a supplier to deliver products at a reduced cost or in a timeframe that it knows the supplier will be unable to meet without exploiting workers.

dnata Catering & Retail assesses this risk to be [low](#) for the reasons described at Paragraph 4.2 below.

- **BE DIRECTLY LINKED TO:** Our business may be directly linked to modern slavery where our products, services or operations are directly linked to harm carried out by a third party, such as a supplier. For example, our business may be directly linked to modern slavery if it sources fish from a third party that uses forced labour in its fishing industry or sources fresh fruit from a third party that subjects fruit pickers to debt bondage.

dnata Catering & Retail assesses this risk to be [moderate to high](#) because a significant proportion of the types of goods and services that it procures, as described at Paragraph 3.3 above, are sourced from high-risk industries based on information from the [Walk Free Global Slavery Index 2023](#), including:

- Electronic products/components
- Labour-hire and agency labour
- Seafood
- Uniforms & PPE
- Fruits and Vegetables
- Coffee, Tea, & Cocoa
- Packaging

##### 4.1 What are the Modern Slavery Risks in our Operations?

We assess the risk of modern slavery within our operations, for our direct workforce, to be [negligible](#). dnata Catering & Retail maintains and actively implements a robust framework of workplace policies which supports a safe and fair working environment, complies with applicable Australian employment legislation and regulations, and conforms to the workplace policy framework which applies to the broader Emirates Group globally.

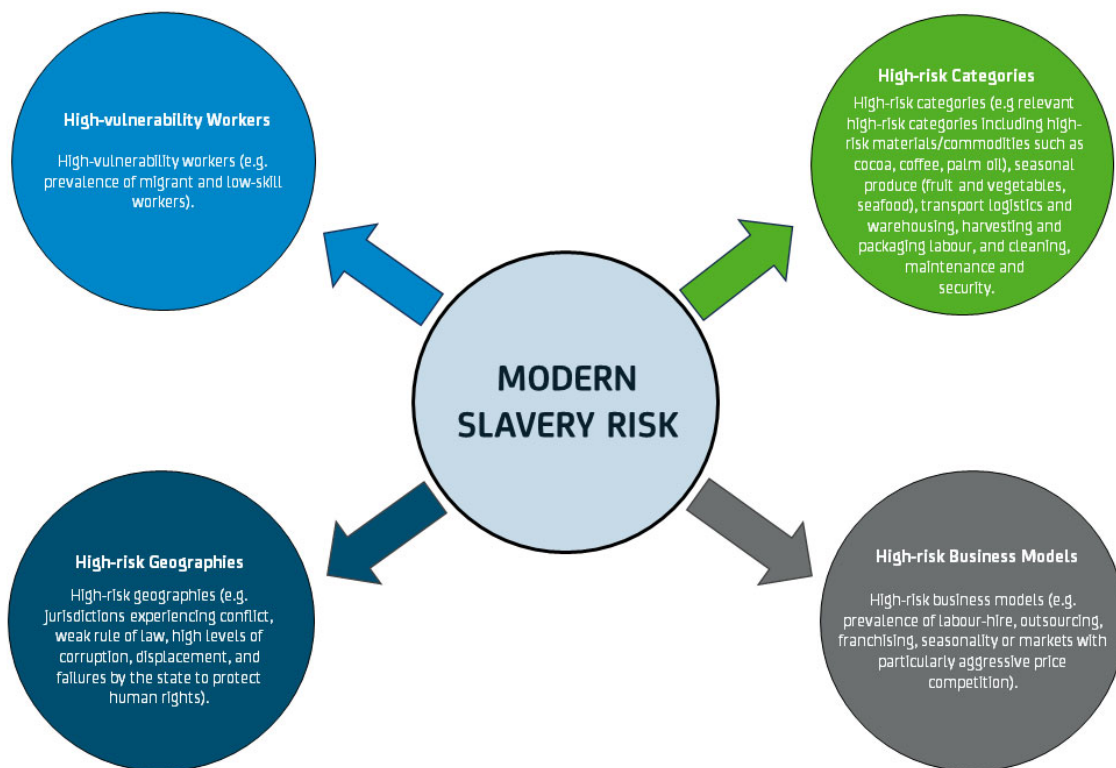
At dnata Catering & Retail we also understand that all forms of labour exploitation may lay the foundations for modern slavery practices, and we support the rights of our employees to freedom of association with unions and to engage in collective bargaining. dnata Catering & Retail actively engages with multiple unions which represent various parts of its workforce, and dnata Catering & Retail has agreed to six (6) current industrial instruments together with those unions.

While we have assessed the risk of modern slavery involving our direct employees as negligible, we do recognise that without appropriate due diligence, contractual controls, and monitoring processes being implemented by dnata Catering & Retail, contracted or contingent workers, including those engaged through third-party labour hire providers may be more vulnerable to modern slavery, particularly where those workers are lower-skilled and/or temporary or migrant workers.

#### 4.2 What are the Modern Slavery Risks in our Supply Chain?

At dnata Catering & Retail we recognise that we operate within a supply chain which includes several categories of goods and services, relating to the production, processing, packaging and transport of food and beverage, which are at risk of either causing, contributing to, or being directly linked to modern slavery practices.

We work to identify higher risk areas for modern slavery in our supply chain by applying the assessment framework outlined below:



This table outlines the key procurement categories that we have assessed may be associated with a potentially higher risk of modern slavery based on the framework above:

Category of Product of Service	% of Total Supplier Spend	Modern Slavery Risk Factors
Food & Beverage	53%	<p><b>High-risk Business Models:</b> Low visibility over multi-tiered supply chains which cross into other high-risk sectors and high-risk geographies and are subject to wide fluctuations in seasonal demand.</p> <p><b>High-vulnerability Workers:</b> Widespread use of seasonal labour and low-skill migrant labour within Australia.</p> <p><b>High-risk Categories:</b> Known categories of risk include cocoa, coffee, palm oil, seasonal produce (including fruit and vegetables, seafood), transport logistics and warehousing, and harvesting and packaging labour.</p>
Labour	20%	<p><b>High-risk Business Models:</b> Reduced visibility over agency and labour hire workers terms and conditions of employment.</p> <p><b>High-vulnerability Workers:</b> Widespread use of transient labour and low-skill migrant labour within Australia.</p>
Logistics	4%	<p><b>High-risk Business Models:</b> Low visibility over multi-tiered supply chains which cross into other high-risk sectors and high-risk geographies and are subject to wide fluctuations in seasonal demand.</p> <p><b>High-vulnerability Workers:</b> Widespread use of transient labour and base-skill migrant labour both within Australia and throughout an international supply chain.</p>
ICT	2%	<p><b>High-risk Business Models:</b> Low visibility over multi-tiered and highly complex supply chains which cross into other high-risk sectors and high-risk geographies.</p> <p><b>High-vulnerability Workers:</b> Widespread use of seasonal labour and base-skill migrant labour throughout an international supply chain.</p> <p><b>High-risk Categories:</b> Known categories of risk include electronics.</p>
Packaging	2%	<p><b>High-risk Business Models:</b> Low visibility over multi-tiered supply chains which cross into other high-risk sectors and high-risk geographies.</p> <p><b>High-vulnerability Workers:</b> Widespread use of seasonal labour and base-skill migrant labour both within Australia and throughout an international supply chain.</p>
Uniforms & PPE	1%	<p><b>High-risk Business Models:</b> Low visibility over multi-tiered and highly complex supply chains which cross into other high-risk sectors and high-risk geographies and are also subject to wide fluctuations in seasonal demand.</p> <p><b>High-vulnerability Workers:</b> Widespread use of seasonal labour and base-skill migrant labour throughout an international supply chain.</p> <p><b>High-risk Categories:</b> Known categories of risk include cotton.</p>

## 5 ACTIONS TAKEN TO ASSESS AND ADDRESS IDENTIFIED MODERN SLAVERY RISKS

At dnata Catering & Retail, we proactively seek to identify, assess and address modern slavery risks in our operations and supply chains. Importantly, we also integrate our response to modern slavery into our broader work to respect human rights.

We have aligned our modern slavery response with the UNGPs and the key principles of the UN Universal Declaration of Human Rights (UDHR) and International Labour Organisation (ILO) Core Labour Standards. We also purchase products that meet all relevant Australian and New Zealand Standards, and preference products that are readily available in the local market.

As part of the Emirates Group, we are a signatory to the United Nations Global Compact (**UNGC**), the 10 key principles of which include commitments to human rights and labour rights, including the upholding of the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced and compulsory labour, and the effective abolition of child labour.

Our modern slavery response and actions to assess and address modern slavery risks in our operations and supply chain are built on:

### 5.1 Our Policies and Procedures

To uphold our commitment to ethical business practices, we have implemented policies and procedures to address modern slavery risks in both our operations and supply chains. These policies are made available, regularly reviewed, and communicated to relevant stakeholders, and currently include:

- **Business Code of Conduct:** The Emirates Group Business Code of Conduct is intended to govern how all dnata Catering & Retail personnel, and all personnel across the Emirates Group, are to conduct themselves in accordance with the highest ethical standards and responsible business practices. It outlines our zero-tolerance approach to modern slavery and human trafficking, our focus on sustainable procurement, and our commitment to acting ethically and with integrity in all our business dealings and relationships.
- **Anti-Slavery and Human Trafficking Policy:** The Emirates Group Anti-Slavery and Human Trafficking Policy applies to all employees, officers and directors, as well as anyone acting on behalf of dnata Catering & Retail, and all other companies within the Emirates Group. It outlines our commitment to implementing effective systems and controls to ensure modern slavery is not tolerated in our own business, or in any of our supply chains. It specifies that as part of our contracting processes, we must include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. In addition, we expect that our suppliers will hold their own suppliers to the same high standards.
- **Supplier Code of Conduct:** The Emirates Group Supplier Code of Conduct details the key principles of conduct and expectations that dnata Catering & Retail has on all suppliers whom we do business with. It is published on our website, and we expect all our suppliers agree to, and comply with it. The Supplier Code of Conduct provides that our suppliers:
  - shall not under any circumstance use or benefit from, any form of forced or compulsory labour or any other form of involuntary labour or service which is extracted from any person under coercion, harassment, the menace of any penalty such as the use of physical punishment, confinement, or threats of violence as a method of discipline or control;
  - are strictly prohibited from using child labour;
  - shall set in place appropriate measures to identify the risks associated with their operations, and implement appropriate controls to mitigate those risks; and
  - shall periodically conduct objective and independent audits, and submit to the auditing of the Emirates Group, to ensure the prevention and timely correction of any non-compliance and the implementation of improvements and corrective actions as appropriate.



- **Whistleblower Policy:** The dnata Catering & Retail Whistleblower Policy outlines the operation of the dnata Catering & Retail whistleblower program. This includes information about how dnata Catering & Retail personnel can make confidential disclosures, which could potentially include modern slavery-related complaints.

## 5.2 Supply Chain Due Diligence

At dnata Catering & Retail, as part of the implementation of our policy framework for managing modern slavery risks within our supply chain, we utilise the digital procurement solution Scanmarket to support our supply-chain due diligence efforts.

### Scanmarket

We specifically use Scanmarket's supplier management and risk assessment tools. One key component of this process is the deployment of questionnaires to all new suppliers as part of our supplier onboarding process. For example, new suppliers are required to respond to the following questions:

*"Has your company signed up for the UN Global Compact or any other international standards regarding Environment and Sustainability, Anti-Bribery and Corruption, Modern Slavery, Human Rights, or any other compliance areas? If so, please briefly describe and upload any applicable documentation.";* and

*"Has modern slavery occurred, or are risks of modern slavery present, in your business operations? If so, please provide details, including what steps you have (or are) taking to address the harm or risk."*

The responses to these questions, along with other information collected by dnata Catering & Retail, is used to assess our suppliers' commitment to relevant international standards and their business model risk of Modern Slavery. By gathering this information, we aim to:

- **Identify Compliance Levels:** Determine whether our suppliers are aligned with relevant global benchmarks, such as the UN Global Compact;
- **Evaluate Supplier Practices:** Understand and assess the specific measures our suppliers have in place to address modern slavery risks within their own operations and supply chain and identify and engage with suppliers in relation to opportunities for improvement. For example, during RP24 dnata Catering & Retail undertook sample testing of the pay records of selected labour-hire providers as an assurance measure for compliance with its fair-pay expectations.
- **Risk Segmentation:** Categorise suppliers based on their adherence to applicable standards, helping us prioritise higher-risk suppliers for further engagement aimed at mitigating risks of modern slavery.

## 5.3 Contractual Measures

At dnata Catering & Retail, we also expect all suppliers to contractually agree to the following minimum requirements:

- to comply with all applicable modern slavery laws, statutes and regulations from time to time in force including but not limited to the *Modern Slavery Act 2018 (Cth)* and any relevant policies of dnata Catering & Retail;
- to have and maintain throughout the period of their engagement with dnata Catering & Retail their own policies and procedures to address risks of Modern Slavery;
- to not engage in any activity, practice or conduct that would constitute an offence under Division 270 or Division 271 of the Schedule to the Criminal Code Act 1995 (Cth) if such activity, practice or conduct were carried out in Australia;

- to include in contracts with its own subcontractors and suppliers, modern slavery provisions that are at least as onerous as those required by dnata Catering & Retail; and
- to allow dnata Catering & Retail to audit all applicable policies, procedures and certifications of the supplier as required by dnata Catering & Retail.

#### 5.4 Continuous Improvement

At dnata Catering & Retail, we regularly review and update the actions we take to address modern slavery risk in our operations and supply chain. This is to ensure that they remain effective in identifying and mitigating modern slavery risks. Feedback from employees and suppliers, and insights gained from our risk assessments are used to enhance our strategies and tools. We are currently reviewing our ethics and compliance risk management software platform, with the aim of improving our supply chain due-diligence processes.

#### 5.5 Collaboration and Stakeholder Engagement

At dnata Catering & Retail, we recognise that no individual business or person can address the risks of modern slavery in isolation. Collaboration is a key component of our modern slavery response. We understand that to effect positive and sustainable change requires ongoing collective action throughout our supply chain and across the whole aviation sector. We seek opportunities to collaborate with a wide range of stakeholders, including suppliers, customers, business partners, and relevant government agencies. This enables us to share learnings and insights, and to collectively support meaningful progress in combating modern slavery.

dnata remains a founding member of the World Travel & Tourism Council (WTTC) Taskforce to help prevent and combat human trafficking. The taskforce is an industry-wide initiative to assert zero tolerance and share best practice, and comprises fellow WTTC members across hotels, retail, airlines, cruise, technology, finance, and destination management who are similarly committed to preventing and combatting human trafficking. It has a number of objectives including the promotion of industry and consumer awareness of human trafficking and training of employees and travellers on how to identify and report suspected cases.

#### 5.6 Remediation Processes

If dnata Catering & Retail suspects modern slavery or human trafficking practices anywhere within its supply chain it will investigate those suspicions, and if those practices are identified through investigation we will:

- share our concerns with relevant suppliers and attempt to develop mutually agreed actions and responses for remediation. Where unable to reach agreement, we will source from an alternative supplier;
- monitor compliance with any agreed actions and responses targeted at the elimination of the risks identified; and
- where appropriate, share information with relevant authorities and other industry participants to support effective enforcement of applicable laws and regulation, and industry wide responses to mitigate the risks identified.

### 6 ASSESSING THE EFFECTIVENESS IN COMBATting SLAVERY RISKS

**6.1** In order to assess the effectiveness of its actions, each year dnata Catering & Retail evaluates material collected through its Supply Chain Due Diligence measures described at paragraph 5.2 above together with other information collected through consultation within its relevant internal stakeholders, and information which is available from trusted sources within the public domain.

**6.2** Following our review of the effectiveness of the steps we have taken during RP24 to ensure that there is no slavery or human trafficking in our operations or supply chains, we intend to formalise this

process for review with the establishment of a modern slavery working group during the next reporting period, to roll-out a refreshed training program for our key-personnel, and to investigate opportunities to adopt additional software and/or other tools to better map our supply chain and enhance our capacity to identify and address risks of modern slavery within it.

## **7 CONSULTATION WITH REPORTING ENTITIES AND OWNED OF CONTROLLED ENTITIES**

- 7.1** In developing processes and controls implemented by dnata Catering & Retail to address modern slavery risks, a thorough consultation process with relevant internal stakeholders has been undertaken. Our consultation process has included stakeholders from Procurement, People & Culture, Legal, Finance, and Executive Management in Australia and our Dubai based global headquarters.
- 7.2** We have consulted with all the entities that this statement is provided for, and authorised directors of those entities have reviewed the statement prior to its publication.
- 7.3** While this statement does not include upline parent entities within the Emirates Group structure, we have consulted with the Emirates Group management team to ensure that our group policies also address risks of modern slavery in the operations and supply chain of the group.

## **8 OTHER INFORMATION**

This statement has been approved by one or more resolutions of the board of directors, in their capacity as principal governing body for Alpha Flight Services Pty Ltd t/as dnata catering ABN 89 064 142 418 and its wholly owned subsidiaries:

- dnata catering Australia Subsidiary 2 Pty Ltd ABN 34 003 836 440
- dnata catering Australia Subsidiary 1 Pty Ltd ABN 35 003 530 685
- Snap Fresh Pty Limited ABN 55 092 536 475; and
- Alpha-ATS Pty Ltd ABN 98 094 789 796

This Statement is signed by Hiranjan Aloysius in his role as Chief Executive Officer, and board member of each of the entities noted above.

Signed,



**Hiranjan Aloysius**  
**Chief Executive Officer**