



# Modern Slavery Statement

2024



# Contents

---

04

## Overview

**A letter from our CEO**

**Introduction**

Our commitment

---

06

## About Airservices Australia

**Our organisational structure and what we do**

**Our operations**

Worker profiles

**Our supply chain**

---

10

## Airservices Anti Modern Slavery Strategy

---

11

## Modern slavery due diligence activities

**Identifying scope of business activities with modern slavery risks**

**Identifying modern slavery inherent risks in operations and supply chain**

Modern slavery risk categories, definitions and underlying risk factors

**Modern slavery risks in our supply chain**

Supply Chain inherent risks

Supplier residual risk assessment

Supplier risk mitigation

**Modern slavery risks in our operation**

Operations inherent risks

Operations residual risk assessment

**Operations and supply chain ESG risk assessment**

**Modern slavery risks in the aviation industry**

**Improved modern slavery related grievances and concerns reporting and management**

---

20

## Modern slavery capability uplift activities

**Improved modern slavery governance and policy**

Policy updates

Launching Supplier Code of Conduct

ESG Policy

Dedicated social and sustainable procurement resource

**Training and awareness building**

**Reporting on program progress**

---

22

Evaluating the effectiveness of our actions

---

25

Focus areas for FY24/25 and beyond

---

26

## Appendix

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

# 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 2024, which has been prepared in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*.

During the 2023-24 financial year, we made progress on our continued commitment to play an active role in combating modern slavery in our operations and supply chains. Since releasing our inaugural statement in 2020, we have pursued year-on-year improvements in our capabilities to identify, assess and address modern slavery risks and assess the effectiveness of these actions.

Airservices Australia is committed to operating responsibly to protect the rights of our employees, contractors, supply chain workers, customers, and the communities in which we operate. This aligns to our values of ensuring safe and inclusive working environments, trusting, respectful and collaborative relationships and ensuring our people are valued and empowered.

This year we focused on "striving towards impact" with specific focus on practical implementation of prioritised actions to enhance our procurement activities. Significant uplift in our due diligence program included conducting inherent and residual risk assessments of our supply chain and operations, improved supplier risk mitigation and expanded grievance reporting mechanisms.

Internal anti modern slavery capability uplift activities were also impactful and included improving our governance and policy framework, most notably by publishing our inaugural Supplier Code of Conduct. We also continued to build awareness across all areas of the business. In parallel, we implemented our effectiveness framework to measure, report and improve the impact of our program to mitigate the risk of modern slavery. These proactive initiatives have allowed us to take steps towards reducing modern slavery risks, fostering a greater sense of accountability and improvement among our staff and partners.

Looking ahead, our goal is to continue building upon the foundations we have laid, with a focus on driving tangible impact in both our operations and supply chain. We are committed to working closely with our suppliers and stakeholders to mature our current capability and demonstrate our commitment to improvement.

In 2024-25, we will continue to strengthen our modern slavery risk mitigation and management processes and work closely with our suppliers and stakeholders to enhance capability, transparency and accountability.

This statement was approved by Airservices Australia's Board on 6th December 2024.



**Rob Sharp**

Interim Chief Executive Officer  
Airservices Australia

7th December 2024



*Looking ahead, our goal is to continue building upon the foundations we have laid, with a focus on driving tangible impact in both our operations and supply chain.*

# Introduction

This statement was prepared by Airservices Australia to meet the mandatory reporting criteria set out under Australia's *Modern Slavery Act 2018 (Cth)* (the Act). Airservices Australia has no owned or controlled entities. Consultation occurred within the organisation through key stakeholders related to the modern slavery and labour rights program.

This is Airservices Australia (Airservices) fifth Modern Slavery Statement which outlines actions taken to address the modern slavery risks in our operations and supply chain over the financial year ending 30 June 2024 (FY23/24). The Executive Performance Oversight Committee reviewed and approved the statement before submission to the Airservices Australia Board (the 'Board') for approval.

The risks of modern slavery are complex. For this reason, we have adopted an iterative, multi-year approach to continue to enhance our understanding of and response to modern slavery risks. In 2024/25, we focus on 'striving towards impact' progressing the modern slavery actions which we have undertaken and reported on in our prior year statements.

Our approach is risk based, with this statement providing an opportunity to highlight our approach, actions, and reflect on our future action plans to mitigate these risks.



*We continue to advocate for action on modern slavery, ultimately supporting the eradication of modern slavery in our supply chain and operations.*

## 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.*

# About Airservices Australia

## Our organisational structure and what we do

Airservices Australia was established in 1995 under the *Air Services Act 1995*, which split the Civil Aviation Authority into two separate government bodies: Airservices Australia and the Civil Aviation Safety Authority (CASA).

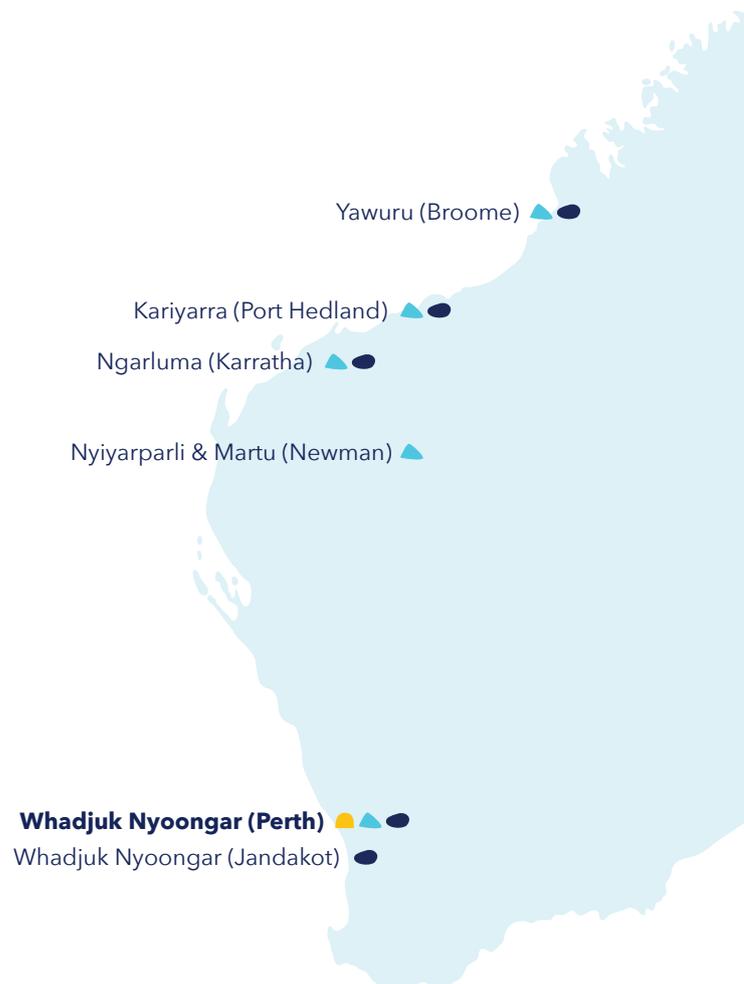
We are a government-owned organisation established by the *Air Services Act 1995*. We are a corporate Commonwealth entity under the *Public Governance, Performance and Accountability Act 2013 (PGPA Act)*, and are accountable to the Minister for Infrastructure, Transport, Regional Development, Communications and the Arts.

As our highest governing body, the Board is responsible for deciding our objectives, strategies, and policies, and ensuring that we perform our functions in a proper, efficient, and effective manner.

Airservices is responsible for Australia's airspace management and operations, managing 11 percent of the world's airspace. Our primary role, as defined under the *Air Services Act 1995*, is to:

- Provide facilities and services for air navigation safety, regularity, and efficiency within Australian-administered airspace. This includes providing air traffic management services, handling aeronautical information, aviation rescue fire fighting services, aviation communications, navigation aids and technology, flight path changes; and
- Promote and foster civil aviation in Australia and overseas.

Figure 1: Our operational footprint



## Legend

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



## Our operations

Airservices has operations across metropolitan and regional Australia, engaging 3,764<sup>1</sup> staff to deliver aerospace and aviation rescue fire fighting services. Airservices' staff occupy a range of roles from corporate services to trade services to support business execution.

**Table 1:** Airservices business units

Business line	What we do
<b>Air Traffic Management service (ATM)</b>	Provide safe, predictable, and efficient air navigation services. We are always working behind the scenes to ensure that all aircraft safely make it 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.
<b>Aviation Rescue Fire Fighting services (ARFF)</b>	Focused on being the safest and effective aviation first responders. We are always on stand by to rescue people and property from an aircraft crash or fire, and other fires and emergencies at airports.
<b>Enabling services</b>	Provide the infrastructure and services necessary for our front-line teams. We build and sustain the broad capabilities every organisation needs to thrive from engaging with stakeholders, managing our workforce and facilities, establishing strategic suppliers, and delivering projects.

## Worker profiles

Workers are engaged directly by Airservices, through sub-contracting 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 2:** 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 3:** Airservices worker roles

Job role classifications	% Workforce <sup>2</sup>	Relevant roles include	Worker description
<b>Specialised services</b>	35%	Air traffic controllers; aviation rescue fire fighters; engineers.	Workers have specialised training and certification. Some employees in specialised services undertake shift work.
<b>Corporate services</b>	17%	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.
<b>Technical and trade services</b>	4%	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.
<b>Labour hire and sub-contracting*</b>	44%	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 sub-contracting is captured in our supply chain data as Tier 1 service providers.

<sup>1</sup> Inclusive of Full-Time Equivalent employees only.

<sup>2</sup> As at June 30, 2024

## Our supply chain

Airservices has a centre-led procurement team that supports the organisation to source goods and services. Airservices aligns its procurement function and categories of spend into portfolio's encompassing Corporate Services (17% of spend), Infrastructure (16% of spend) and Technology (65% of spend). Procurement team members are responsible for engaging and maintaining relationships with suppliers associated with their portfolio.

In FY 23/24, Airservices procured a wide range of goods and services from across multiple countries (17), with a total spend of \$714 million<sup>3</sup> (exclusive of GST). Our most significant spend (34.8 per cent) is in the Aerodrome Platform category and includes aviation-related goods and services such as air traffic control and airways systems. Many of our suppliers, particularly our suppliers of services, are in Australia (95 per cent), resulting in 98 per cent of our spend.

**Table 4: Supplier spend breakdown (by procurement category)**

Portfolio	Procurement category	% of total spend	Associated procurement subcategories
<b>Technology</b>	Aerodrome Platform	34.8%	Aerodrome Platform, Airways Systems
	Enabling Technology Platforms	27.1%	Enterprise Applications, Network and Telecommunication, ICT infrastructure
	Airspace Platform	1.9%	Airspace Platform, Airways Tech Services
	Technology Support	0.9%	Enterprise Architecture, Project Support, Support Services, Information Security
<b>Corporate services</b>	Professional Services	6.1%	Aviation Advisory, Aviation Services, Organisational Advisory, Construction services, Commercial Services, Program Management, Safety Services
	Human Resources	6.0%	Contract Staffing, Contract Staffing and Recruitment, Training and Development, Recruitment, Medical
	Head Office	2.1%	Community Engagement, Compliance, Office Supplies, Educational Materials, Corporate Consumables
	Finance and Legal	1.2%	Financial Services, Insurance Services, Legal Services
	Marketing	0.6%	Advertising, Printing, Marketing
	Logistics	0.3%	Relocation Costs, Transport
	Travel	0.3%	Domestic Travel, Travel
<b>Infrastructure</b>	Construction	7.1%	Facility Construction, Facility Repairs, Facility Improvement
	Facilities Management	4.7%	Cleaning and Waste, Equipment Maintenance, Safety Equipment, Plant and Equipment Leasing, Gardening and Maintenance, Safety Services, Security, Utilities
	Environment	3.9%	PFAS, Training and Development
	Fleet	0.5%	Equipment Maintenance, Running Costs
<b>Other</b>	Other	2.5%	

<sup>3</sup> Addressable spend under contract including capital and operating expenditure



# 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', and the ISO20400 Sustainable Procurement framework. These pillars are outlined below.

**Table 5:** 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

Actions taken within FY23/24 are structured under these pillars. We have progressed and practically implemented key initiatives with a focus on "striving towards impact".

# Modern slavery due diligence activities

Our approach to modern slavery due diligence has been to follow core risk management process and principles, with a focus on inherent risk assessment, supplier surveys, interviews, and residual risk assessment before developing an improvement plan. We have completed this as an annual activity and seek to embed this into our processes in subsequent years, continually improving our internal capabilities.



## Identifying scope of business activities with modern slavery risks

Airservices acknowledges it plays a critical role in identifying and mitigating modern slavery, due to its scale of operations with 3,764<sup>4</sup> employees and more than \$714 (excluding GST) million in supplier annual spend. Our focus and actions take into consideration the potential to cause, contribute to, and be directly linked to modern slavery risks in its operations and supply chain.

In FY23/24, we drew upon the United Nations Guiding Principles (UNGP) on Business and Human Rights<sup>5</sup> to build our awareness and inform the process of identifying the breadth of business activities that pose potential risks. Airservices then undertook a comprehensive risk assessment process on these business activities to further inform our modern slavery exposures.

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 3:** Scope of modern slavery risks for assessment

### Cause

We may directly cause modern slavery through our own operations.



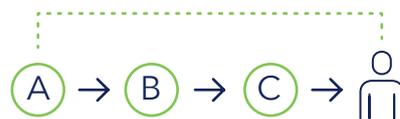
### Contribute

We may contribute to modern slavery through our operations and/ or actions in the supply chain.



### Directly linked

Our operations, products and services may be directly linked to modern slavery through the activities of entities with which we do business and the industry in which we operate.



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.

<sup>4</sup> Inclusive of Full-Time Equivalent employees only.

<sup>5</sup> The UNGP is the authoritative global standard for addressing modern slavery and other human rights harms associated with business activities.

The table below shows the link to modern slavery and the extent of our involvement in relation to our business activities. Each activity was explored further to identify, assess and address specific modern slavery risks.

**Table 6:** 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
<b>Operations</b>	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
<b>Supply chain</b>	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)

## Identifying modern slavery inherent risks in operations and supply chain

Inherent industry and country risk factors, as well as industry controversies were assessed to determine a combined inherent risk level. Airservices' analysed:

- supply chain activities by leveraging Airservices existing procurement spend data (including supplier location information and sourcing categories),
- deidentified workforce data (including employment groups, job families, functions and role descriptions),
- global aviation industry modern slavery risks in which we operate in via desktop research.

**Table 7:** Inherent risk assessment considerations



Country risk (40%)	Industry risk (30%)	Industry controversy assessment (30%)
Assessed using databases, indexes, and reports from internationally recognised bodies, including the International Labour Organization, the Global Rights Index, and the World Bank.	Each Global Industry Classification Standard (GICS) or Australian and New Zealand Standard Industrial Classification (ANZSIC) sub-industry assessed against the prevalence of several risk factors, known to contribute to an increased likelihood and impact on modern slavery risk including labour intensity, skill level, the presence of migrant or sub-contracted workers, and the presence of opaque intermediaries.	Performed by undertaking a media and literature review for the past 10 years.  The scale and impact of the identified controversy, or the number of instances, is used to determine a controversy risk score.

## 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 8:** Modern slavery risk categories, definitions and underlying risk factors informing inherent risk assessment.

Risk category	Definition
<b>Child labour</b>	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).  <b>Underlying risk factors</b> <ul style="list-style-type: none"> <li>• Child labour</li> </ul>
<b>Forced labour</b>	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.  <b>Underlying risk factors</b> <ul style="list-style-type: none"> <li>• Employment type</li> <li>• Labour intensity</li> <li>• Level of regulation</li> <li>• Migrant workers</li> <li>• Presence of opaque intermediaries</li> <li>• Skill level</li> <li>• Sub-contracted labour</li> </ul>
<b>Human trafficking</b>	The recruitment, harbouring and movement of a person for exploitation through modern slavery.  <b>Underlying risk factors</b> <ul style="list-style-type: none"> <li>• Employment type</li> <li>• Labour intensity</li> <li>• Level of regulation</li> <li>• Migrant workers</li> <li>• Presence of opaque intermediaries</li> <li>• Skill level</li> <li>• Sub-contracted labour</li> </ul>

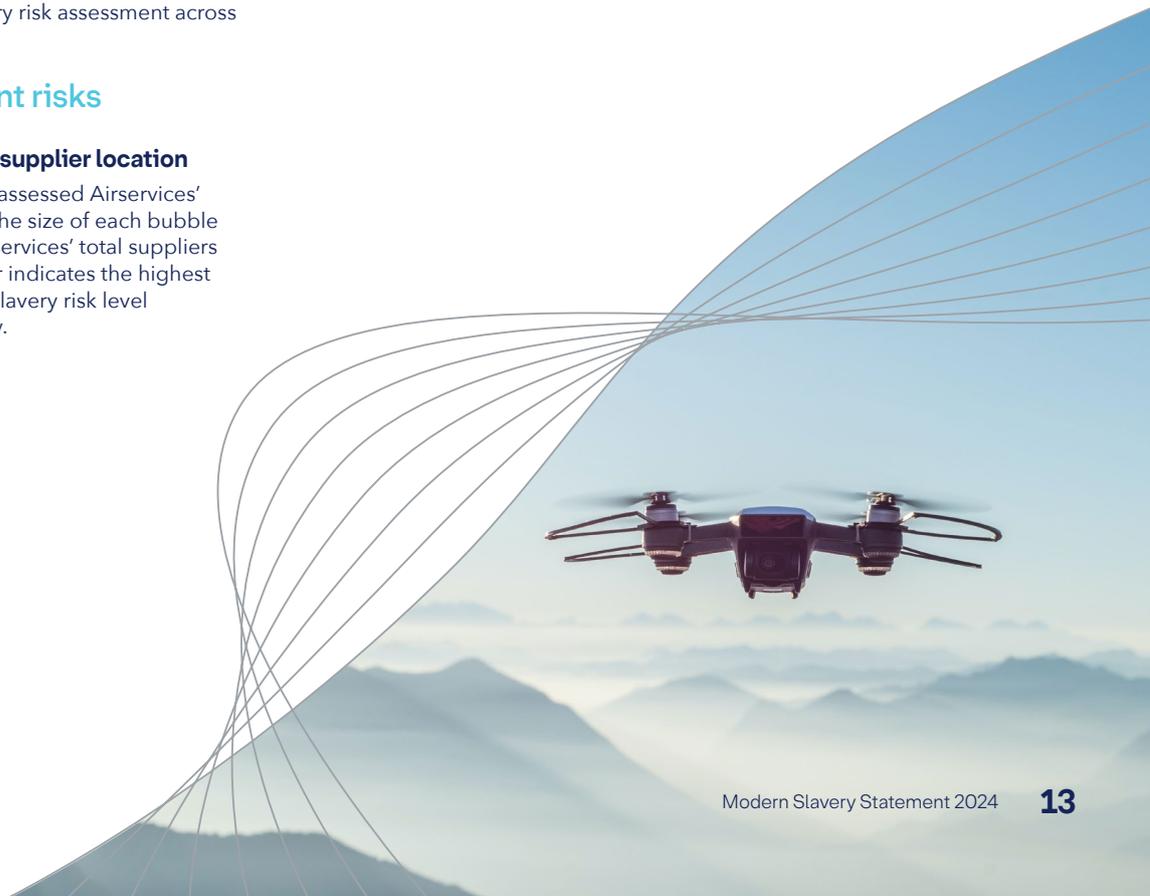
## Modern slavery risks in our supply chain

To identify and assess supply chain risk, in FY23/24 Airservices conducted an annual update to its comprehensive modern slavery risk assessment across its Tier 1 supply chain.

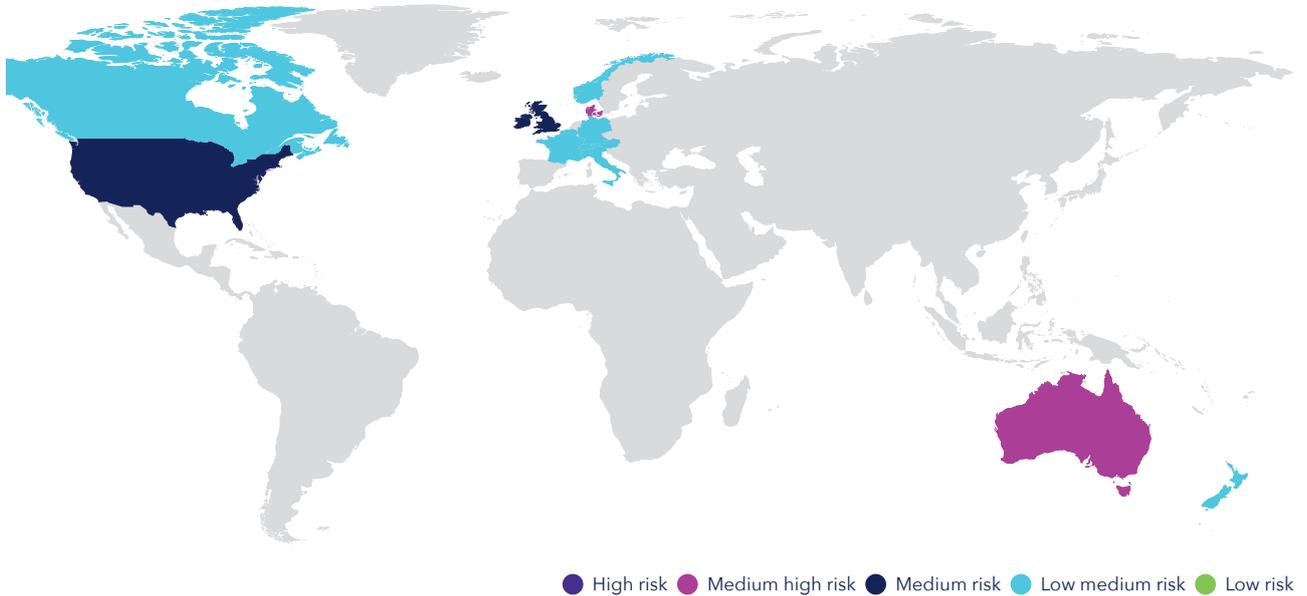
### Supply chain inherent risks

#### Maximum inherent risk by supplier location

The global map shows where assessed Airservices' Tier 1 suppliers are situated. The size of each bubble represents the per cent of Airservices' total suppliers in each country and the colour indicates the highest occurring maximum modern slavery risk level for any supplier in that country.



**Figure 3: Maximum inherent risk by supplier location**



**Maximum inherent risk profile by spend:**

- 73 per cent of our Tier 1 supply chain by spend (and 64 per cent by number) has a low to medium or low inherent risk for modern slavery.
- 26 per cent of our supply chain by spend (and 36 per cent by number) has a medium to high inherent risk for modern slavery.

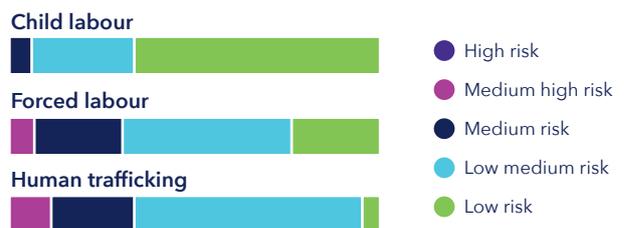
**Table 9: Maximum inherent risk profile by spend**

Max inherent risk rating	% of assessed 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
Low-medium	60%	71%	Aerospace and Defence; Other Professional, Scientific and Technical Services; Integrated Telecommunication Services; Application Software; Engineering Design and Engineering Consulting Services; Insurance Brokers
Medium	24%	15%	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	12%	11%	Construction and Engineering; Labour Supply Services; Building and Other Industrial Cleaning Services; Electronic Equipment and Instruments; Personal Protective Equipment Manufacturing; Hotels, Resorts and Cruise Lines
High	0%	0%	N/A

**Top inherent modern slavery risk types across Tier 1 supply chain**

Human trafficking is the most prominent modern slavery inherent risk type across the supply chain, with 11 per cent of suppliers rated with an inherent risk of medium-high. These suppliers’ sub-industries included: Building and Other Industrial Cleaning Services, Labour Supply Services, Hotels, Resorts and Cruise Lines, Health Care Supplies, PPE Manufacturing, Construction and Engineering, Electrical Components and Equipment, and Electronic Equipment and Instruments.

**Graph 1: Top inherent risk typers**



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

Below outlines the Tier 1 sub industries which we procure from that have the highest inherent risk in descending order. This is based on the highest type of modern slavery risk including human trafficking, forced labour and child labour.

**Table 10:** Sub-industries with highest inherent risk and types

Sub-industry and Inherent Risk Profile	% of all suppliers	% of total spend	Risks associated with Tier 1 procurement
<b>1. Personal protective equipment manufacturing (PPE)</b>	0.7%	0.2%	<p>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.</p> <p>Use of labour agents or sub-contracting to cut production costs to compete for price-sensitive customers.</p> <p>Offshore manufacturing locations in inherently higher risk countries, such as China, India and Malaysia.<sup>6,7</sup></p>
<b>2. Building and other industrial cleaning services</b>	0.6%	0.4%	<p>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.</p> <p>Informal hiring practices or sub-contracting resulting in challenges to monitor and enforce labour standards.</p> <p>Pressures to deliver competitively priced services may lead operators to undertake cost-cutting measures that compromise fair wages or working hours.<sup>8,9</sup></p>
<b>3. Electronic equipment and instruments</b>	2.3%	0.5%	<p>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 sub-contracted 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.<sup>10,11</sup></p>
<b>4. Labour supply services</b>	1.9%	4.6%	<p>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.</p> <p>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.<sup>12,13</sup></p>
<b>5. Electrical components and equipment</b>	1.8%	0.1%	<p>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 sub-contracted 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.</p>
<b>6. Construction and engineering</b>	3.0%	4.8%	<p>Reliance on complex sub-contracting arrangements obscuring lines of accountability for fair labour conditions, allowing employers, contractors or labour agents to exploit workers with limited repercussions.</p> <p>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<sup>14,15</sup></p>

6 "Stitched with slavery in the seams"; Walk Free Global Slavery Index, <https://www.walkfree.org/global-slavery-index/findings/spotlights/stitched-with-slavery-in-the-seams/>

7 "Tackling modern slavery in PPE supply chains: a practical guide for public bodies"; Impactt Limited and the UK Home Office, [https://assets.publishing.service.gov.uk/media/60ad129e8fa8f520ca2e7c64/Tackling\\_modern\\_slavery\\_in\\_PPE\\_supply\\_chains\\_-\\_guidance\\_for\\_public\\_bodies.pdf](https://assets.publishing.service.gov.uk/media/60ad129e8fa8f520ca2e7c64/Tackling_modern_slavery_in_PPE_supply_chains_-_guidance_for_public_bodies.pdf)

8 "Tackling modern slavery in PPE supply chains: a practical guide for public bodies"; Impactt Limited and the UK Home Office, [https://assets.publishing.service.gov.uk/media/60ad129e8fa8f520ca2e7c64/Tackling\\_modern\\_slavery\\_in\\_PPE\\_supply\\_chains\\_-\\_guidance\\_for\\_public\\_bodies.pdf](https://assets.publishing.service.gov.uk/media/60ad129e8fa8f520ca2e7c64/Tackling_modern_slavery_in_PPE_supply_chains_-_guidance_for_public_bodies.pdf)

9 "Modern slavery in cleaning supply chains"; Cleaning Accountability Framework, <https://www.cleaningaccountability.org.au/modern-slavery/>

10 Table 1: Imports of products at risk of modern slavery to Australia, "Modern Slavery in Australia", Walk Free, <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

11 "Modern slavery exposed in big tech supply chains"; Informed 365, [https://informed365.com/modern-slavery-exposed-in-big-tech-supply-chains/#Modern\\_Slavery\\_Exposed\\_In\\_Big\\_Tech\\_Supply\\_Chains](https://informed365.com/modern-slavery-exposed-in-big-tech-supply-chains/#Modern_Slavery_Exposed_In_Big_Tech_Supply_Chains)

12 "Labour hire and supply chains"; Fair Work Ombudsman, <https://www.fairwork.gov.au/find-help-for/labour-hire-and-supply-chains>

13 Vulnerability, "Modern Slavery in Australia", Walk Free Global Slavery Index, <https://www.walkfree.org/global-slavery-index/country-studies/australia>

14 "Property, construction and modern slavery: Practical responses for managing risk to people", Australian Human Rights Commission, [https://humanrights.gov.au/sites/default/files/document/publication/ahrc\\_kpmg\\_modernslavery\\_property\\_construction\\_2020.pdf](https://humanrights.gov.au/sites/default/files/document/publication/ahrc_kpmg_modernslavery_property_construction_2020.pdf)

15 "Pathway to respecting human rights and addressing modern slavery risks", Property Council of Australia, <https://www.propertycouncil.com.au/wp-content/uploads/2024/03/Pathway-to-Respecting-Human-Rights-and-Addressing-Modern-Slavery-Risks.pdf>

## Supplier residual risk assessment

To further understand and assess the risk of modern slavery in Airservices' supply chain, a residual risk assessment of key suppliers with medium-high inherent risk was conducted via supplier surveys and interviews. In FY22/23 we commenced a prioritised approach to assess residual risk assessment through a combination of 58 supplier surveys, 10 interviews and desktop research. We expanded this in FY23/24 to survey an additional 21 suppliers, in addition to nine suppliers who were reinvited from FY22/23. Five unique supplier interviews were also conducted in FY23/24.

### Modern slavery residual risk survey

A supplier prioritisation assessment based on the results of the inherent risk assessment, spend and business criticality was conducted to identify 30 suppliers for engagement via a modern slavery survey.

Survey questions assessed suppliers on specific governance and due diligence systems and controls they have in place for their own operations and supply chains. It also assessed suppliers' unique operational risk factors and workforce characteristics that may increase or decrease suppliers' residual risk level compared to their inherent risk rating.

### Supplier interviews

To complement the survey and obtain additional insights, five suppliers were interviewed, focusing on their risk profiles and survey responses. Suppliers were able to discuss their own supplier management practices and policies to manage their own suppliers, including the drafting of a supplier code of conduct, supplier self-assessment questionnaires, and in some cases desktop audits of higher risk suppliers.

### Tier 2 observations

Suppliers were asked questions about their supply chain to increase awareness across Airservices Tier 2 supply chain. Most of the suppliers interviewed discussed at a high level their highest spend categories, and where they consider there to be potential risk. Suppliers were able to discuss their own supplier management practices and policies to manage their own suppliers, including the drafting of a supplier code of conduct, supplier self-assessment questionnaires, and in some cases desktop audits of higher risk suppliers.

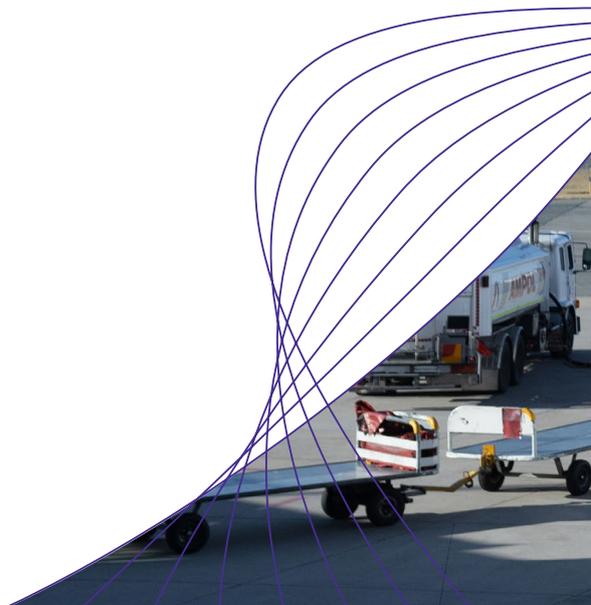
Examples of Tier 2 risk factors:

- manufacturing locations, complexity and visibility
- offshore sourcing of services and identification of source country locations
- supply chain complexity of technology distributors and manufacturers
- Tier 2 sub-industries with higher inherent risk profiles are aligned to our Tier 1 inherent highest risk sub industries e.g. PPE, Building and Other Industrial Cleaning Services.

### Supply chain residual risk insights

For suppliers (14/30) who provided a survey response, there was a reduction in the risk rating due to the strength of their modern slavery management programs. There were three suppliers whose risk ratings remained the same.

Most suppliers reported recent growth and maturity in the modern slavery risk management space driven by regulatory pressure and industry expectations. Opportunities for consultation and collaboration are growing in response to the introduction of mandatory reporting requirements and overall rise in stakeholder awareness. Where some smaller suppliers did not exhibit as much maturity in this space, they did exhibit awareness of the issues and an intention or openness to introduce relevant controls in the future. Common challenges encountered in this space include resource availability, lack of awareness and/or clarity around future expectations and availability of data due to supply chain complexity.



## Supplier risk mitigation

Airservices typically engages with suppliers deemed higher risk on their management of modern slavery on an 'ad hoc' or 'as required' basis throughout the contract term. The supplier survey and interviews provided an opportunity to formalise this engagement and elevated modern slavery as a topic with our suppliers. This resulted in increasing Airservices' knowledge and awareness of suppliers' unique risk profiles, and increased buy-in from suppliers to progress modern slavery agendas within their own organisations. In FY22/23, a set of recommendations to improve modern slavery management were made with reference to the *ISO 20400 Sustainable Procurement Framework*, the *United Nations Guiding Principles and Business and Human Rights* and the *OECD Due Diligence Guidance for Responsible Business Conduct*. Action plans included recommendations for both Airservices and the supplier to execute.

In FY23/24 Airservices progressed many of the actions to improve our own capability, as outlined in this report and many of our suppliers have also matured their own capability.

Set out below are the high-level themes of recommendations, tailored to a supplier's context. Airservices will work with suppliers in FY24/25 and beyond to identify priority recommendations to action and build it into Airservices broader procurement processes.

In addition, we continue to incorporate modern slavery and human rights clauses into our contracts.

**Figure 6:** Thematic recommendations for due diligence and risk mitigation plans

<b>Commit to modern slavery management</b>	<b>Identify modern slavery risks</b> in the organisation and broader value chain	<b>Assign accountability</b> to key personnel to monitoring modern slavery in the organisation	<b>Upskill</b> workers to support to identification and management of modern slavery risks
<b>Establish ongoing management</b> of modern slavery risks appropriate to the organisation	<b>Monitor management program</b> through tracking key indicators	<b>Report</b> modern slavery management activities	<b>Strengthen</b> grievance mechanisms and remediation approach



## Modern slavery risks in our operations

### Operations inherent risks

Following the same approach as our supply chain risk assessment, in FY23/24, Airservices conducted a comprehensive risk assessment of our operational risk of modern slavery in line with our FY22/23 commitment

Based on our assessment, the inherent risk of modern slavery across all areas of our operations is predominantly low to low-medium. This is driven in part by the strong regulatory framework in Australia and the skilled composition of our workforce. This demonstrates our company's adherence to high legal and ethical standards in its direct operations.

### Operations residual risk assessment

#### Interviews

In assessing our controls for our operations, a series of interviews were conducted by an independent third party to assess control and arrangements on modern slavery including existing management strategies, structures and processes, and workforce risk controls that are in place to reduce Airservices' inherent modern slavery risk ratings.

#### Operations residual risk insights

Further risk analysis on our direct and indirect workforce indicates that Airservices' directly employed workforce has a low residual risk of modern slavery. This is due to Airservices' extensive workforce risk management controls and employee onboarding processes, the highly professionalised nature of its workforce, and its operating context as a highly regulated organisation with high rates of workforce unionisation.

Airservices' indirect workforce has low to low-medium residual risk for modern slavery. Indirect workforce risks are effectively mitigated by Airservices' existing due diligence processes over labour hire agencies and third-party services providers who employ these workers and provide contracted services to Airservices. In addition, all indirect workers are in Australia and are employed under major contracts that adhere to national employment and award standards.

## Operations and supply chain ESG risk assessment

In FY23/24, Airservices expanded operations and supply chain risk assessment to include the full environmental, social and governance (ESG) spectrum of risks. There is an increasing understanding and appreciation globally of the interconnectedness of issues across the ESG spectrum. Awareness of risks and potential impacts across this ESG spectrum allows for holistic decision making when managing risks that could significantly affect an organisation's long-term outcomes. Airservices acknowledges there is a need to balance human rights risks and issues with the other ESG risks, such as the focus on decarbonisation.

## 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.<sup>16</sup>

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 crime<sup>17</sup>.

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 trafficking<sup>18</sup> and is proactive in coordinating, establishing, and supporting anti modern slavery capabilities across the international aviation industry.

The international Civil Aviation Organisation<sup>19</sup> (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.

<sup>16</sup> International Awareness Training on Human Trafficking, 2018 [ICAO Int](#)

<sup>17</sup> 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.

<sup>18</sup> International Aviation Transport Authority (IATA)

<sup>19</sup> The International Civil Aviation Organization (ICAO) is a United Nations agency which helps 193 countries to cooperate together and share their skies to their mutual benefit.



## Improved 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. In FY23/24, a dedicated sustainable procurement email address was created and 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.

A prototype of a more sophisticated external reporting mechanism has also been developed with further work ongoing to implement effectively. We will continue to work through our process and approach to manage and develop an appropriate mechanism for modern slavery related grievance and an external reporting channel in FY24/25, ensuring that it is reflective of our risk profile.

In FY23/24, no potential instances of modern slavery in our operations nor supply chain were reported.

# Modern slavery capability uplift activities

## Improved modern slavery governance and policy

In addition to the governance structure outlined in the FY22/23 statement, additional capabilities have been introduced and policies updated.

### Policy updates

**Table 11:** Our policies

Policy	Purpose	FY24 update
Code of Conduct	Sets the expectation that our employees, Board members, contractors, and consultants do not tolerate inappropriate workplace behaviour including bullying, harassment (including sexual harassment), discrimination, fraud, corruption, violence, and other misconduct.	Updated in FY24
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 FY24
People policy	Outlines our focus to deliver safe, valued, efficient and innovative services that promote and foster aviation.	Updated in FY23
Bullying, Harassment and Discrimination policy	Documents our commitment to providing a workplace that is psychologically safe, respectful and free from unacceptable behaviour. Airservices does not tolerate any form of bullying, sexual harassment, harassment or discrimination.	Updated in FY23
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.	Developed FY23/24
ESG Policy	Documents our commitment to sound Environmental, Social and Governance (ESG) practices.	In development in FY23/24

### Launching Supplier Code of Conduct

In addition to updating the policies as outlined above, Airservices introduced a Supplier Code of Conduct ('SCOC') in FY23/24.

The SCOC supports our commitment to ethical, sustainable, and socially responsible procurement, including anti modern slavery.

The SCOC defines the expectations of its suppliers and their supply chains, positioning procurement as an enabler of the Airservices' core values that guide our business: Safe Always, Service First, Love What We Do, Work as One, and Own It.

We view our suppliers as our partners and care about the way our suppliers operate when providing goods or services, to or on behalf of us. We want our supplier relationships to create enduring sustainable value for our stakeholders. We seek to work constructively, transparently, and cooperatively with our suppliers to support them in meeting our expectations.

The SCOC is being integrated into the various request for tender and relevant contract templates.

It has been published on our website Information for suppliers –Airservices ([airservicesaustralia.com](https://airservicesaustralia.com)), communicated to our suppliers, and presented to the entire organisation. In addition, we are finalising the inclusion of the new SCOC provisions into the suite of contract templates. The Procurement Manual has been updated to include reference to the SCOC and outlines that all suppliers must be made aware of our expectations of them.

For rollout details please refer to the effectiveness measurement framework on page 22.

### ESG Policy

To achieve long-term positive outcomes for our people, customers, stakeholders and the community, we are committed to sound environmental, social and governance (ESG) practices. Following the request from the Board to develop an ESG Action Plan, an Airservices-wide ESG Policy is in development. It is intended to include specific reference to preventing or mitigating human rights impacts, including modern slavery, resulting from our activities. The Board request exemplifies the growing focus of ESG from our most senior stakeholders.

### Dedicated social and sustainable procurement resource

For the first time, Airservices has introduced a dedicated resource to lead the modern slavery program, and social and sustainability more broadly. This demonstrates our commitment to using our purchasing power to maximise positive and minimise negative impacts on our community. Furthermore, the remit of this role has increased collaboration between the procurement and environment teams to address ESG risks across the organisation's activities.

## Training and awareness building

A key initiative in FY23/24 was to release a new modern slavery online learning module across our business, to build awareness and knowledge of modern slavery across our organisation. In FY23/24, we refreshed and enhanced our Modern Slavery Awareness Training to be more comprehensive and fit for purpose for an organisational wide audience. It was design 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.

The training is mandated for desk-based staff and team leaders as well as being distributed as to all remaining staff as an optional learning module. As of 30 June 2024, 949 staff had completed the training.

## Reporting on program progress

As per the evaluating effectiveness of our actions section, outlined below, in FY23/24 we matured our ability to assess and monitor program progress and have used this framework to better report update the Working Group and Executives. See below for details.

In addition, we have included social and sustainable procurement updates in the FY23/24 Annual Report, with specific reference to modern slavery initiatives.



# Evaluating the effectiveness of our actions

Airservices committed to implementing a comprehensive set of metrics and KPIs to monitor the effectiveness of actions and establish a monitoring mechanism to evaluate actions over each reporting period.

In FY22/23, we developed an Effectiveness Measurement Framework ('Framework'). This Framework was a significant evolution in our approach to monitoring the effectiveness of our modern slavery program. The framework was applied to selected actions and due diligence activities to determine metrics for tracking and reporting in FY23/24 and assess their effectiveness. This Framework will continue to be implemented in FY24/25 and beyond.

**Table 12:** Effectiveness Measurement Framework

	Prioritised focus areas	Status	FY24 Output	FY24 Effectiveness	
Capability Uplift Program	<b>1. Governance</b>				
	1.1	Prioritise key activities to begin tracking and reporting output and short-term impact and effectiveness measures.	Completed, to be refreshed continually	<ul style="list-style-type: none"> <li>Effectiveness measurement framework developed for FY24 for prioritised key activities</li> <li>Regular reporting to Head of COO, Head of Procurement, the Modern Slavery Working Group and the Executive Leadership Team</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing improvement and maturity of Airservices' anti modern slavery program</li> <li>Increased transparency</li> <li>Increased awareness and accountability of program</li> </ul>
	1.2	Continue to embed the Modern Slavery Working Group into Airservices' governance systems and hold two sessions during FY24.	Completed and ongoing	<ul style="list-style-type: none"> <li>2 Modern Slavery Working Group meetings held in FY24</li> <li>Cross functional membership updated and expanded</li> <li>WG completed modern slavery, ESG and sustainable procurement training including global reporting trends</li> </ul>	<ul style="list-style-type: none"> <li>Increased awareness and accountability of modern slavery program and sustainable procurement more broadly to an expanded WG</li> </ul>
	1.3	Develop and publish Supplier Code of Conduct	Completed	<ul style="list-style-type: none"> <li>Supplier Code of Conduct developed</li> <li>Published on website</li> <li>Communicated by the Head of Procurement via email to strategic suppliers, desk-based staff and team leaders</li> <li>Communicated to all staff via online news stories and social media posts</li> <li>Presented at a Procurement Townhall and the Working Group</li> </ul>	<ul style="list-style-type: none"> <li>Clearer communication of Airservices' expectations to Suppliers and staff to promote decent work and abolish modern slavery in operations and supply chain</li> </ul>
	<b>2. Strategy</b>				
	2.1	Review of the roadmap and refresh objectives to focus on practical implementation	In progress and ongoing	<ul style="list-style-type: none"> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing improvement and maturity of Airservices' modern slavery program</li> </ul>
	<b>3. Capability</b>				
	3.1	Ongoing training delivered to procurement and contract management personnel	Completed for ongoing use	<ul style="list-style-type: none"> <li>Modern Slavery Awareness Training enhanced to be more comprehensive and fit for purpose for organisational wide audience</li> <li>Mandated training for desk-based staff and optional for non-desk-based staff</li> <li>949 staff completed training</li> </ul>	<ul style="list-style-type: none"> <li>Positive stakeholder feedback</li> <li>Increased internal accountability and capability to implement our anti modern slavery and due diligence program</li> </ul>
	<b>4. Reporting</b>				
	4.1	Ongoing annual submission of Airservices' Modern Slavery Statement	Completed	<ul style="list-style-type: none"> <li>Modern Slavery Statement submitted and compliant with all aspects of the Modern Slavery Act (2018)</li> </ul>	<ul style="list-style-type: none"> <li>Zero non-compliance with legislative requirements of the Modern Slavery Act</li> </ul>
4.2	Continue to report on human rights and modern slavery risks in Annual Report	Completed	<ul style="list-style-type: none"> <li>Human rights, modern slavery, sustainable procurement, diversity and OHS program of activities reported</li> </ul>	<ul style="list-style-type: none"> <li>Transparent and maturing external communication of our commitment to Anti modern slavery program and sustainable procurement more broadly</li> </ul>	

	Prioritised focus areas	Status	FY24 Output	FY24 Effectiveness	
Due Diligence Program	<b>5. Identify and assess risk</b>				
	5.1	Conduct modern slavery risk assessments over direct supply chain	Completed	<ul style="list-style-type: none"> <li>Tier 1 modern slavery risk assessment conducted for 76% of direct suppliers with addressable spend (732/968 suppliers) (98% of FY24 spend)</li> <li>30 prioritised suppliers sent survey to capture modern slavery procedures and inform residual risk score (covering 13.1% of addressable spend). 16 responded in some form. An increase from last year</li> <li>5 prioritised supplier interviews (covering 2.2% of total spend)</li> </ul>	<ul style="list-style-type: none"> <li>Strengthen understanding of risk profile to identify opportunities for targeted due diligence</li> <li>Strengthen supplier engagement</li> </ul>
	5.2	Seek to understand Tier 2 suppliers' modern slavery risk	Future commitment	<ul style="list-style-type: none"> <li>5 prioritised Tier 1 suppliers considered higher risk interviewed including questions on their supply chains.</li> </ul>	<ul style="list-style-type: none"> <li>Strengthened understanding of our value chain to identify and reduce modern slavery risk beyond Tier 1 suppliers</li> </ul>
	5.3	Conduct modern slavery risk assessments over operations	Completed	<ul style="list-style-type: none"> <li>Modern slavery risk assessment conducted on direct and indirect workforce</li> <li>4 interviews conducted with internal stakeholders representing cross section of business to understand operating processes, procedures to inform residual modern slavery risks</li> </ul>	<ul style="list-style-type: none"> <li>Strengthen understanding of risk profile to identify opportunities for targeted due diligence</li> <li>Identify mitigating controls and their effectiveness</li> <li>Strengthen operations staff awareness of modern slavery risks</li> </ul>
	5.4	Streamline procurement and tender processes across organisation to ensure they consistently incorporate modern slavery and human rights risks	Ongoing	<ul style="list-style-type: none"> <li>Numerous procurement tender processes included modern slavery and human rights risks questions to inform risk profile and supplier selection</li> </ul>	<ul style="list-style-type: none"> <li>Proactive identification and assessment of risks at supplier selection stage of the procurement lifecycle</li> </ul>
	<b>6. Mitigate risks</b>				
	6.1	Continue to incorporate modern slavery and human rights clauses in our contracts	Prepared for ongoing use	<ul style="list-style-type: none"> <li>92% procurement contracts executed included a modern slavery/human rights clause</li> <li>Process of finalising the inclusion of the new SCOC provisions into the suite of contract templates is in progress. Due to be completed FY25</li> </ul>	<ul style="list-style-type: none"> <li>Clearer communication of Airservices' expectations to Suppliers to promote decent work and abolish modern slavery in operations and supply chain</li> </ul>
<b>7. Remediate</b>					
7.1	Continue to work through our process and approach to manage and develop an appropriate mechanism for modern-slavery related grievance	In progress	<ul style="list-style-type: none"> <li>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</li> <li>Dedicated sustainable procurement email address created and published on website as an additional channel where any stakeholder in the supply chain can confidentially report concerns about potential incidences of Modern Slavery</li> <li>Zero modern slavery concerns raised in FY24</li> </ul>	<ul style="list-style-type: none"> <li>Collaboration with risk management and grievance mechanism management resources</li> <li>Additional channel to support the identification and management of modern slavery</li> </ul>	



# Focus areas for FY24/25 and beyond

Airservices is committed to continually improving its understanding of and response to modern slavery risks.

Set out below are our focus areas for FY24/25 and beyond, aligned to our key strategic pillars:

**Table 13:** Focus for FY25 and beyond

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

# Appendix

## 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	4
Describe the reporting entity's structure, operations, and supply chain	Airservices Australia is responsible for Australia's airspace management and operations. Airservices engages 3,764 (FTE equivalent) staff across Air Traffic Management Services, Aviation Rescue Firefighting Services and Enabling Services. Airservices procures a wide range of goods and services from Tier 1 suppliers in 17 sourcing countries, with a total addressable spend of \$714 (excl GST) million. The key spend categories are aerodrome platforms, enabling technology platforms, professional services and human resources.	Our organisational structure and what we do	6
		Our operations	8
		Our supply chain	9
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 its operations is predominantly low to low-medium. Further residual risk insights indicates that our directly employed workforce has a low residual risk of modern slavery. Airservices' indirect workforce has low to low-medium residual risk for modern slavery however, controls are put in place to minimise this risk. 73 per cent of our Tier 1 supply chain by spend (and 64 per cent by number) has a low to medium or low inherent risk for modern slavery. The remaining 11 per cent of our supply chain by spend (and 12 per cent by number) has a medium to high inherent risk for modern slavery.	Modern slavery risks in our supply chain	11
		Modern slavery risks in our operations	18
		Modern slavery risks in the aviation industry	18
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 launching a Supplier Code of Conducts in FY23/24. During the year we engaged several higher risk suppliers through supplier questionnaires and interviews to gain a deeper understanding of their risks and elevate modern slavery as a topic of importance. We also conducted a risk assessment of our operations supplemented with interviews to gain a deeper understanding of our inherent risks and mitigating controls. Modern slavery training and awareness building, a more comprehensive and transparent program progress reporting and improved grievances and concerns reporting, and management also add as controls to mitigate risk with expanded reporting pathways and channels.	Airservices Anti Modern Slavery Strategy	10
		Modern slavery due diligence activities	11
		Identifying modern slavery inherent risks in operations and supply chain	12
		Supplier residual risk assessment	16
		Tier 2 insights	16
		Supplier risk mitigation	17
		Operations residual risk assessment	18
		Deepening our understanding of supply chain risk	18
		Improved modern slavery related grievances and concerns reporting and management	19
		Modern slavery capability uplift activities	20
Improved modern slavery governance and policy	20		
Training and awareness building	21		
Reporting on program progress	21		
Describe how the reporting entity assesses the effectiveness of these actions	During the 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 FY25.	Evaluating the effectiveness of our actions	22
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	4
Provide any other relevant information	In FY23/24, Airservices expanded operations and supply chain risk assessment to include the full environmental, social and governance (ESG) spectrum of risks. There is an increasing understanding and appreciation globally of the interconnectedness of issues across the ESG spectrum.	Operations and supply chain ESG risk assessment	18



