Queensland Airports LIMITED

Modern Slavery Statement

Financial Year ended 30 June 2025

Acknowledgement of Country

Queensland Airports Limited acknowledges the Traditional Custodians of the cultural landscapes on which our airports operate.

We recognise their continued connection to the lands, waterways, seas, and skies and pay our respects to their Elders past, present and emerging.

Key Actions During FY2025

QAL's focus this year has been maintaining our Modern Slavery framework and activities to strengthen our foundations in the fight against Modern Slavery. These works included:

✦ Updated and reissued our mandatory Modern Slavery training provided to all employees.

✦ Procurement function and team developed "Principles for Suppliers", which are QAL's minimum expectations for its prospective and contracted Suppliers.

✦ Continued its review and amendment of human rights and procurement clauses within critical contracts, particularly Security and Cleaning.

✦ For FY26, QAL's plan is to uplift our partnerships with suppliers on awareness and alignment of our values and acceptable practices including modern slavery assurance. We are also currently investigating full participation in the Major Airport campaign with A21s in the combat against human trafficking and modern slavery led by Sydney and Melbourne Airports. A21s has kindly agreed to allow us to use some of their training modules to uplift modern slavery training for QAL employees.

Contents

Joint Message Chair and CEO

Queensland Airports Limited (QAL) is strongly opposed to modern slavery in all its forms. We are committed to respecting and supporting fundamental human rights and building relationships with our business partners and stakeholders who share that commitment.

QAL has a strategic understanding of the risk of modern slavery relating to our operations and supply chain and the risks identified to date are outlined in this statement. However, we acknowledge that further risk management activities are desirable and are indeed required to establish a deeper understanding of our modern slavery risk and enable further improvements.

Pleasingly in FY2025, we remained vigilant in relation to modern slavery risk and we did not detect or identify any instances of it in our operations or supply chain network.

We have established the foundations upon which to continue to develop a mature and effective approach to managing modern slavery risks on an ongoing basis. This commenced with our initial Modern Slavery Improvement Plan (FY21-25), our Modern Slavery Framework and our various governance practices relating to the management of risks and assurance of our controls relating to modern slavery risk e.g. conditions in contracts, due diligence and assurance within the procurement of services from existing and prospective services' providers, staff training and engagement with government agencies.

We recognise that as an airport group, our infrastructure may be used as a gateway for human trafficking, and we work closely with the relevant government agencies to mitigate this risk.

This statement complies with the requirements of the Modern Slavery Act 2018 (the Act) and was developed by QAL's Legal and Governance Department, was endorsed by our Executive and Risk and Audit Committee and approved by our Board of Directors. It is signed by the Chair of the Board, Ann Sherry AO, and Chief Executive Officer, Amelia Evans in accordance with section 14(2)(d)(iii) of the Act.

Ann Sherry AO
Chair
Queensland Airports Limited

Amelia Evans
Chief Executive Officer
Queensland Airports Limited

Our Company

About Us

Queensland Airports Limited (QAL) is an accomplished airport operator that owns and operates Gold Coast, Townsville, Mount Isa and Longreach airports. We are committed to delivering for our shareholders and the communities in which we operate, recognising the important economic and social benefits we offer to the regions we support.

Our Structure

Queensland Airports Limited (QAL) underwent a significant change in ownership in the past year, with the securities' sale of our majority shareholding (74.25%) completed on 31 March 2025 to new owners.

From 1 April 2025, QAL's structure became:

- The Trust Company (Australia) Limited ATF the Tango Managed Investment Trust 1 (17.87%);
- The Trust Company (Australia) Limited ATF the Tango Managed Investment Trust 2 (15.52%);
- The Trust Company Limited ATF the Tango Managed Investment Trust 3 (14.48%);
- Skip Airports Pty Ltd ATF the Skip Airports Trust (26.38%);
- Perron Investments Pty Ltd (24.62%);
- Mr Allan Moss (0.82%); and
- Lipno Holdings Pty Ltd (0.31%).
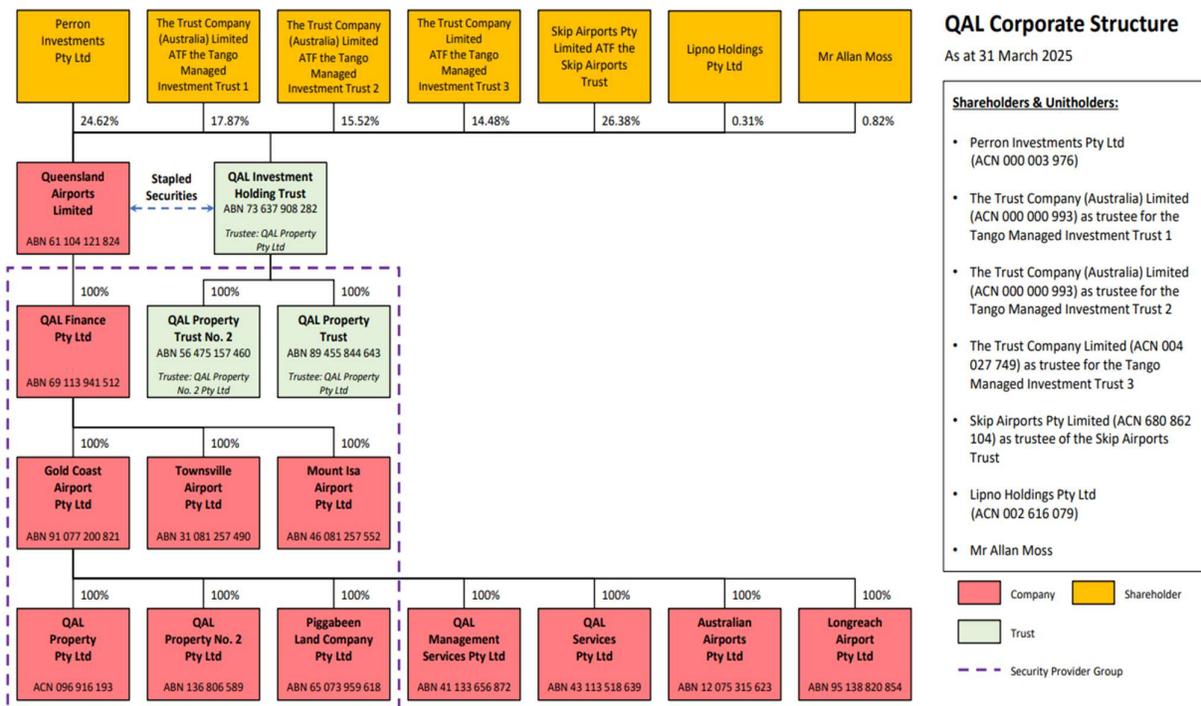
Our Airports

6m Passengers in FY25
90% Domestic
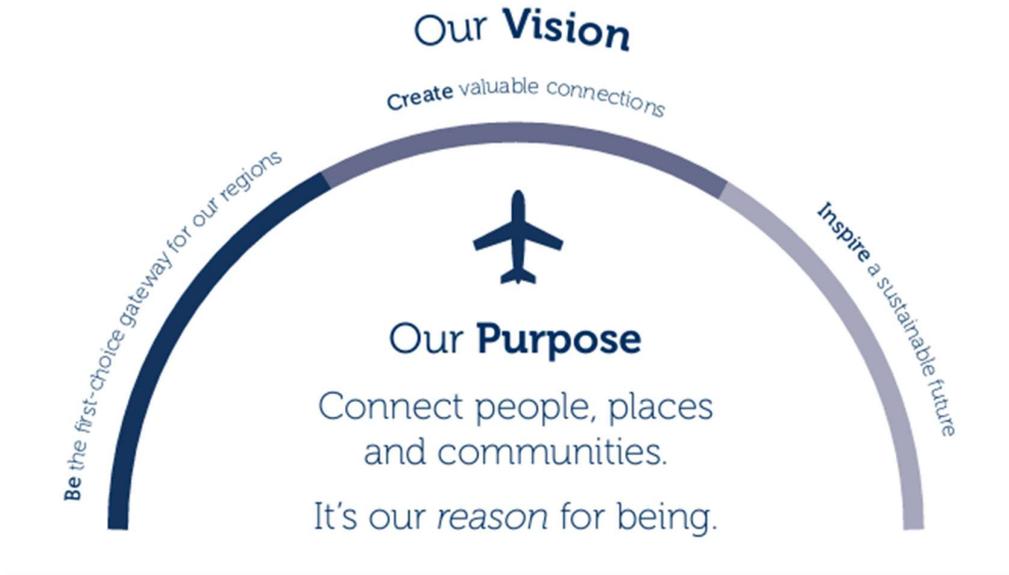**10% International**

1.7m Passengers in FY25
100% Domestic

0.24m Passengers in FY25
100% Domestic

0.03m Passengers in FY25
100% Domestic

Our Vision, Purpose, and Values

Our **Vision**

Create valuable connections

Be the first-choice gateway for our regions

Inspire a sustainable future

Our **Purpose**

Connect people, places and communities.

It's our *reason* for being.

Our **Values**

Authentic

We are true to ourselves and our communities. We build genuine connections and deliver on our promises with integrity.

Inclusive

We celebrate difference and empower one another. We value every perspective and recognise that diversity makes us stronger.

Brave

We dare to be different and inspire change. We pursue new opportunities with courage and challenge the status quo.

Responsible

We lead the way with purpose. We are accountable for our decisions.

Governance

QAL has a well-developed Governance Framework consisting of structure, reporting lines, systems, and processes to ensure that our internal governance standards are followed, our objectives are achieved, risks are managed, and regulatory requirements met. QAL utilises strategic level internal controls which apply across all airports, with operational level internal controls, as appropriate and required, for each airport.

The Framework utilises three lines of defense model which supports effective governance throughout each tier of the organisation from senior management, through to the Board and Shareholders. The following internal controls apply to the management of modern slavery risk:

- → Code of Conduct
- → Modern Slavery Framework
- → Fraud and Corruption Control Framework
- → Whistleblower Framework
- → Employee training
- → Ongoing Stakeholder Engagement.

This risk is jointly managed and coordinated by the Legal and Governance and the Finance departments who engage with other departments to manage and control the identified risks e.g. Operations, People & Culture. Our activities come under the oversight of the Executive Committee, and escalated to the Risk and Audit Committee and Board when required.

QAL's recently established SME Procurement and Sustainability functions have supported centralising of the management of modern slavery, especially in major procurement activities and with this additional expertise and capacity, will work with QAL's other departments and stakeholders to support and advance our modern slavery strategies.

Consultation

QAL utilises established structure and reporting lines to enable effective consultation, collaboration and reporting in respect of modern slavery risks and activities across all QAL entities. This process is supported by members of the Legal and Governance, Finance, Operations and Projects Teams enabling effective cross business representation, consultation, and collaboration. The consultation process includes risk identification and assessment, determining actions and initiatives and ongoing performance monitoring and reporting.

QAL also engages externally with airport stakeholders including Home Affairs, Australian Federal Police, Queensland Police and New South Wales Police. Working together, identified risks and controls, strategies and importantly, learnings are shared and in this way, our communities benefit from our collective approach in combatting modern slavery. This approach also ensures that we have access to the latest information and where possible, intelligence relating to possible modern slavery activities and related risk.

Our Operations

As an airport operator, QAL derives the majority of its revenue from airport and airport-related operations, with further revenue derived from property holdings. For further detail please see the Queensland Airports Limited Annual Report.

Revenue Streams

Aviation operations with revenue derived from aeronautical service charges for Regular Passenger Transport, General Aviation and Freight.

Portfolio of leases for terminal food and beverage concessions.

Car park and ground transport servicing access to and from the airport.

Portfolio of leases for terminal retail concessions.

Property portfolio including university, hotel, medical, aviation, freight, car rental, retail, and hospitality.
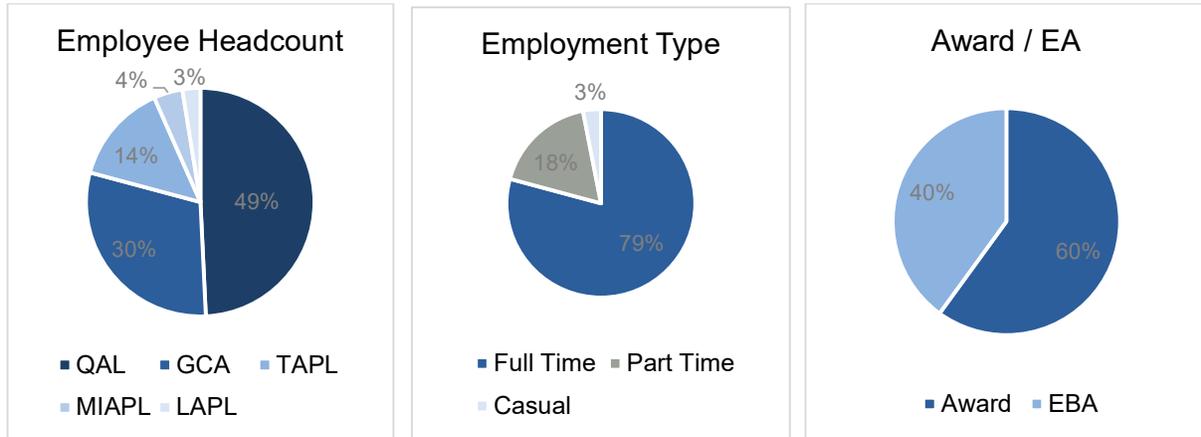
Portfolio of leases for terminal service providers.

Workforce

QAL's workforce is predominantly employed under a Modern Award contract or Enterprise Agreement (EA) on a full-time or part-time basis.

QAL also outsources a significant volume of services (e.g. security screening, cleaning, and car park management) to third parties under contracts and agreements due to the nature and extent of its operations.

Employee Headcount

- QAL: 49%
- GCA: 30%
- TAPL: 14%
- MIAPL: 4%
- LAPL: 3%

Employment Type

- Full Time: 79%
- Part Time: 18%
- Casual: 3%

Award / EA

- Award: 60%
- EBA: 40%

Our Supply Chains

Products and Services

QAL's supply chain largely consists of goods and services provided to support airport operations.

Products		
Technology, including computer hardware and mobile phones.		Major capital projects under design and construct contracts.
Software, including software as a service.		Promotional goods and materials (not for re-sale).
Assets and infrastructure and related replacement parts.		Uniforms and PPE (not for re-sale)

Services			
	Aviation security screening services.		Car park management.
	Cleaning services for terminal and administrative buildings.		Major capital projects under design and construct contracts.
	Curb-side concierge.		Technology support services.
	Trades and trade related services.		Consultancy services.

Sectors and Services

Where possible, QAL usually sources products and services from Australian based companies. However, some products are manufactured outside Australia and fall within higher risk sectors.

Country of Origin	Products and Services
Southeast Asia	Technology hardware, promotional goods, uniforms and PPE, assets, and infrastructure. Support services (Car park call centre/Philippines)
India	IT Support and services.

QAL, to the extent that it is possible, reviews overseas product and service companies' Modern Slavery practices during the procurement phase of obtaining new products or services to identify any at risk businesses. In some cases, this is difficult, however, in undertaking due diligence of the supplier, we are usually able to gauge whether they are a reputable supplier and appropriate trading partner. Our new procurement function will better enable us to make further improvements in this important aspect of our business activities.

Modern Slavery Risk

Risk Assessment

Risk Management activities are conducted in accordance with QAL's Risk Management Framework (aligned with ISO 31000:2018), with specific application to the external and internal modern slavery context and factors.

QAL undertakes strategic risk assessments in relation to modern slavery risks and this has occurred during the reporting period. In addition to this, QAL assesses any direct operational risks of modern slavery during our business as usual due diligence processes and approvals. Our reviews consider geographic, sector and product risks in addition to assessing the entity supplying the product or service.

QAL acknowledges that visibility and understanding of modern slavery risk is developing, improving and ongoing. Where appropriate, QAL utilises open-source data, including the Walk Free Global Slavery Index to assist with assessing the risk from modern slavery. QAL also engages with external subject matter experts and stakeholders (particularly government agencies) to conduct a deeper dive into the risk areas identified in our risk assessments if required but this has not been necessary during this period. QAL will continue to develop a clearer and deeper understanding of the materiality of any potential vulnerabilities or risks and just as importantly, the manner in which QAL potentially causes, contributes or is in some way is unknowingly linked to modern slavery.

Operational Risk

QAL did not detect any instances of modern slavery directly linked to our operations in the reporting period, however, we continue to monitor the following areas which present a heightened risk.

Aviation security screening services are provided by a third party under contract (**235 workers**) and may have presented a heightened risk due to the sector risk. QAL is satisfied that the risk is well controlled and assurance gained of their good management of this risk during the procurement phase.

Cleaning services are provided under contract by a number of third parties who service various QAL sites (**251 workers**) and present a heightened risk due to the sector risk. QAL is satisfied that the risk is controlled, with recent assurance activities indicating there are no sub-contracted employees and/or employees without appropriate visas and that employee payments are made in accordance with the relevant award.

On-Airport Risk

QAL acknowledges that there is an indirect risk (low) of modern slavery from third party operations and leaseholders.

Workers are engaged under contract to third parties operating on QAL properties. This includes airline baggage handlers, cleaners, and caterers. There is a potential contingent workforce risk associated with these sectors. QAL will continue to engage with third parties to promote and encourage practices to reduce the risk of modern slavery. QAL gains assurance by contracting only with well regarded, sophisticated and reputable third parties.

QAL leases premises to a broad range of businesses including food and beverage, catering, retail, general aviation, tertiary education, fuel supply, transport, childcare and medical services. The indirect risk of modern slavery is considered low, however QAL will continue to engage with tenants to promote and encourage practices to reduce the risk of modern slavery. QAL gains assurance by contracting only with well regarded, sophisticated and reputable third parties.

Supply Chain Risk

QAL continues to develop a greater understanding of the risk of modern slavery in its supply chain. Whilst the strategic assessment of our supply chain has indicated potential vulnerabilities in regard to technology and promotional products sourced from foreign countries, as is the case in most industries, further supply chain mapping and assessment of the risk will be undertaken to enable the actual risk to be fully understood and further controlled. Through our procurement and assurance practices, risk associated with modern slavery in our supply chain is considered low. This capability is greatly enhanced with our SME procurement function.

QAL utilises an extensive range of technology (hardware and software) to conduct and support operations. Technology is generally sourced from established providers, however QAL acknowledges there is a heightened risk in relation to the materials used to manufacture some items and a potential labour risk depending upon the geographic origin of an item.

QAL has engages in a wide range of construction projects, ranging from small to major. In the case of major projects, these involve the engagement of a tier one or two construction contractor, generally under a design and construct contract. Smaller capital projects are undertaken involving smaller construction companies. QAL acknowledges that a heightened supply chain risk exists with materials or construction elements potentially being sourced from geographic locations where the modern slavery index is high. However, this risk is mitigated using reputable local companies and strong engagement with them and sharing our concerns and expectations regarding modern slavery risk.

QAL purchases equipment, infrastructure, and components for use in airport operations. Purchases are in most cases, from recognised Australian based companies with a low direct modern slavery risk, however, QAL acknowledges that there may be risks of modern slavery in the supply chain of goods which are purchased.

QAL purchases promotional goods and materials used to promote airport activities. Purchases are in most cases from Australian based companies; however, some items are manufactured in Southeast Asia with a heightened modern slavery supply chain risk.

QAL purchases uniform items and personal protective equipment for use in airport operations. Purchases are in most cases, from Australian based companies; however, some items are manufactured in Southeast Asia with a heightened modern slavery supply chain risk.

QAL engages Australian based companies to provide IT Support services in relation to some software systems. The Australian based companies on occasion, utilise overseas subject matter experts to provide certain IT support services. QAL has been assured that the terms and conditions by which the foreign subject matter experts are contracted by those companies are consistent with relevant markets from where the services are provided.

Gateway Risk

QAL airports service domestic and international markets and as a consequence, may serve as a gateway for a number of classes of modern slavery including servitude, forced labour, debt bondage, forced marriage and human trafficking. Due to its location and reputation as a holiday destination, Gold Coast Airport presents a heightened gateway risk for human trafficking. The risk is considered lower with international arrivals remaining lower in the current reporting period and post - COVID.

Human Trafficking Through Airports
Globalisation and the increase in movement between countries via air travel has also increased the illegal movement of people. Human Trafficking is the movement of vulnerable persons by threat, force of coercion to control and exploit that person. Airports may be gateways for a range of human trafficking activities including sexual exploitation, debt bondage and servitude or forced begging. The aviation industry is able to mitigate the risk of human trafficking by raising awareness amongst employees and stakeholders to detect suspect activity, encourage reporting to relevant agencies on the ground, creating awareness for victims and active collaboration with relevant agencies.

As part of QAL's FY26 actions in this period, QAL is considering joining Major Airport campaigns by A21 to combat human trafficking and modern slavery. Specifically, so as to raise awareness on how to recognise key indicators and respond to potential exploitation / human trafficking at our Airports and acting through appropriate reporting channels to authorities. This campaign has been led by Sydney and Melbourne Airports. Whilst we consider the appropriateness of QAL's participation given our reduced international arrivals, A21 have kindly allowed QALK to access some of their training materials which QAL will be utilising in the coming reporting period so as to raise awareness and upskill our employees in relation to identifying and managing modern slavery risk.

Controlling the Risk

During the reporting period, QAL has continued to take proactive action to manage the risk of modern slavery and we will continue to implement improvements in our performance in this important area.

Modern Slavery Strategies

Our Modern Slavery Strategies are focused on ongoing real and sustainable outcomes and wherever possible, improvements. The strategies and actions are risk based and are developed through consultation with key stakeholders.

A key element of our strategy is integration of modern slavery considerations into our business-as-usual activities as well as our current policies and practices to ensure effective utilisation. An example of this approach was the redrafting of our Airport Conditions of Use which includes requirements for air operators in relation to reporting and management of modern slavery risks as a condition of use for QAL's airports. We have taken a similar approach in updating our standard Purchase Order's terms and conditions, various contract templates and implementing QALs principles for Suppliers.

Modern Slavery Framework

QAL's Modern Slavery Framework comprises established protocols and procedures to be applied to the management of the risk of modern slavery arising directly and indirectly from QAL operations. The framework includes:

- Modern Slavery Policy
- Principles for Suppliers
- Risk Assessments
- Risk Treatments and Mitigation Initiatives
- Collaboration
- Engagement
- Training and Awareness
- Monitoring and Review.

Ongoing Focus

QAL is strongly opposed to modern slavery in all its forms. We are committed to respecting and supporting fundamental human rights and building relationships with businesses and stakeholders who share that commitment. QAL's ongoing approach to managing modern slavery risk involves:

- Assessing modern slavery risks particularly in relation to procurement, projects, and airport operations
- Facilitating and monitoring implementation of modern slavery risk treatments
- Identifying and facilitating opportunities to collaborate with agencies, business partners and/or non-government organisations to mitigate modern slavery risks
- Monitoring and reviewing effectiveness of treatments and actions
- Promoting awareness and capability development in relation to modern slavery
- Monitoring and reviewing effectiveness of our Modern Slavery Framework.

QAL continually reviews and improves its practices to ensure our supply chain remains ethical, inclusive, and free from modern slavery. Our expectation of our suppliers is to share this commitment and work with us to promote a safe, fair, and sustainable future for all.

Key Person Training

QAL employees undertake Modern Slavery Awareness Training. As part of FY26 training plan, we are currently investigating advanced training from an external organisation A21 for staff on how to recognise key indicators and respond to potential exploitation / human trafficking at our Airports, and act through appropriate reporting channels to authorities.

Contract Terms & Conditions

QAL updates its suite of precedent contracts from time to time and in doing so, ensures that they include terms that impose obligations on suppliers to address modern slavery compliance requirements, assurance and notifications, and support QAL in completion of due diligence activities. These clauses are included in new and updated goods and services contracts. Furthermore, they are included in QAL's lease and licence agreements to provide a level of assurance in respect of tenants' on-airport activities.

Principles for Suppliers

QAL's Principles for Suppliers set clear expectations for all individuals and entities providing goods or services to QAL. We require our suppliers to:

- Prioritise health, safety, and wellbeing for everyone working at or visiting our airports.

- Supporting fundamental human rights as set out in the Universal Declaration of Human Rights and Core Labour Organisation convention.

- Conduct business ethically, working against all forms of corruption and maintaining transparency in all dealings.

- Respect fundamental human rights, ensuring fair working conditions, prohibiting child and forced labour, and complying with all relevant workplace laws, including the Modern Slavery Act 2018.

- Foster diversity, equity, and inclusion, and support a workplace free from discrimination and harassment.

- Operate sustainably, minimising environmental impact and supporting QAL's goal of net-zero greenhouse gas emissions by 2030.

- Uphold robust data protection and cyber security standards and manage risks to ensure business continuity.

Access Cards

QAL issues access identification cards for all stakeholders requiring access to the airport. Issuance of the access card is subject to rigorous conditions, including verification of identity and right to work status. The checks undertaken provide assurance and mitigate risk of modern slavery relating to the individuals involved.

Minimum Procurement Standards

QAL continues to focus on Environment, Social & Governance (ESG) risks and opportunities. It has a clear set of ESG priorities, which have been agreed with our Board. An important element of the Governance pillar is embedding minimum human rights standards into our procurement practices. For high-value and high-risk procurement activities, our sourcing plan template usually includes a 10% weighting for ESG considerations depending on the circumstances at hand e.g. available suppliers, supplies or services involved.

Key Activities FY25

Updated and reissued our mandatory Modern Slavery training provided to all employees.

Reviewed and amended human rights clauses where needed within critical contracts, Security and Cleaning.

Review of Policies periodically which focus on human rights e.g. Code of Conduct, Fraud and Corruption Control, Risk Management, Modern Slavery, Whistleblower.

Development of "Principles for Suppliers", QAL's minimum expectations for its prospective and contracted Suppliers, in our Procurement function.

Due Diligence and Assurance

Due Diligence

QAL has identified effective due diligence as a central element of our Modern Slavery strategies. During the reporting period due diligence activities were limited to the use of open-source information, including review of Modern Slavery Statements and published information, and self-reporting from suppliers through questionnaire responses. Deeper dive due diligence activities are planned as part of our ESG initiatives under the stewardship of our SME sustainability function and within our new QAL 5-year Strategic Plan FY26 under our new ownership structure.

Assurance

QAL continues to develop and embed appropriate assurance requirements for our suppliers. This includes the provision of details of their practices to QAL in tenders, completion of self-assessments and provision of assurance certificates confirming compliance with the principles of the Act.

QAL also works collaboratively with identified high risk suppliers to gain assurance that risks arising from modern slavery are being managed and that actions or remedies are effective.

Grievance Reporting

QAL has a well-established Whistleblower Framework which is supported by a Whistleblower Hotline (FairCall). The FairCall service is provided for QAL under contract with KPMG. The QAL Whistleblower Framework provides a rigorous structure and clear mechanisms to enable matters to be reported, managed, investigated, and resolved in an effective manner which maintains privacy and confidentiality.

QAL actively promotes the existence of the Hotline to ensure that employees and stakeholders are aware the FairCall Hotline may be utilised to report inappropriate behaviour including modern slavery related matters.

Control Effectiveness

In accordance with the QAL Risk Management Framework, the effectiveness of risk controls is monitored on an ongoing basis and reviewed periodically, usually quarterly. Control effectiveness is also reviewed periodically, including when an incident occurs to determine whether a control has been effective, implemented correctly or if there is a control deficiency. Where corrective action is required, corrective action will be taken in a timeframe commensurate with the risk presented by the deficiency. Control effectiveness in respect of all identified risks is an ongoing and dynamic process including those risks associated with modern slavery.

Remedial Action

QAL has not been required to seek and/or implement remedial action in relation to modern slavery during the reporting period. QAL will investigate all grievances or detected instances of modern slavery in accordance with the Modern Slavery Policy and determine the root cause and contributing factors.

QAL will ensure corrective and remedial actions are developed to directly address the root cause and contributing factors for all grievances or detected instances to ensure that any further risk of modern slavery is reduced so far as reasonably practicable.

Where required, QAL will work collaboratively through this process with suppliers or service providers to ensure meaningful and sustainable action is taken.

Performance Assurance

QAL assures the performance of its Modern Slavery initiatives by:

- ✈ Training
- ✈ Procurement and Contract Performance Monitoring
- ✈ Supplier and Contractor Assurances and Engagement
- ✈ Audits (as required)
- ✈ Grievances
- ✈ Whistleblower Promotion
- ✈ Corrective Actions (as required)
- ✈ Actioning Detected Modern Slavery Issues
- ✈ Agency Engagement.

QAL's performance is monitored, and any identified risks reported to the Risk and Audit Committee and where appropriate, the Board.

Continual Improvement

The Modern Slavery Framework, including risk management and controls, is subject to ongoing review and improvement. This process of continual improvement for modern slavery risk is championed by Legal and Governance and Procurement and undertaken by the various QAL departments. This process includes an annual review and non-scheduled reviews when regulatory amendments occur, when there is a regulatory action, upon introduction of new practices, when the external context changes or due to audit findings.