

AUSTRALIA
PACIFIC
AIRPORTS
CORPORATION

FY22

Modern Slavery Statement





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Australia Pacific Airports Corporation acknowledges the First Nations of the land on which our airports operate. APAC is committed to working closely with First Nations peoples in Melbourne and Launceston to deepen our understanding about how our airports can continue to operate and develop in a way that recognises and celebrates the airports' First Nations cultural heritage.

APAC pays our respect to their Elders past, present and emerging.

Chief Executive Officer's Message



Australia Pacific Airports Corporation Limited (APAC) operates Melbourne Airport, the second largest airport in Australia, providing an essential link in the nation's transport industry and a significant driver in the Victorian economy. APAC also operates Launceston Airport providing a key linkage to Tasmania.

APAC fully understands the moral, ethical, and human rights obligations it has for the more than 20,000 people who work across both airports, and the innumerable others employed indirectly through our supply chains.

We understand that over 45 million people around the world are victims of modern slavery and that these crimes are not always apparent. As a result, we are committed to working with our internal team members, service providers, contractors, consultants, and key partners to manage and mitigate modern slavery risks.

As a key contributor in the National, Victorian and Tasmanian economy, APAC takes its responsibility of combatting modern slavery and its associated risks seriously. This statement builds on the foundations in the FY20 and FY21 statements and describes the steps taken in FY22 to enhance our risk mitigations across our operations and supply

chain.

APAC did not identify any instances of modern slavery within its operations or supply chain in FY22, however we acknowledge that we need to remain vigilant in monitoring and addressing these risks.

The global COVID-19 pandemic has placed additional pressure on every one of us, however this is especially so for the most vulnerable within our communities. APAC recognises that modern slavery risks may have increased during the COVID-19 pandemic and has, therefore, taken significant steps to support our employees, service providers, contractors, and consultants to counter this.

This statement was approved by the Board of APAC on 14 December 2022.

Lorie Argus

Chief Executive Officer
Australia Pacific Airports
Corporation Limited
14 December 2022



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Introduction



This statement, made pursuant to section 14 of the Modern Slavery Act 2018 (Cth), sets out the risk of modern slavery in APAC's operation and supply chain, the actions taken to assess and mitigate those risks during the financial year, and the effectiveness of those mitigations.

For the purposes of this statement, 'APAC' refers to the **Australia Pacific Airports Corporation Limited 89 069 775 266** and each relevant entity which it controls (the 'APAC Group'), being:

Australia Pacific Airports (Melbourne) Pty Ltd
ABN 62 076 999 114 ("APAM")

Australia Pacific Airports (Launceston) Pty Ltd
ABN 79 081 578 903 ("APAL")

APAC (Holdings No. 2) Pty Ltd
ABN 78 136 451 959 ("AH2")

APAC (Holdings) Pty Ltd
ABN 60 081 578 887 ("AH")

This statement was prepared by key personnel from across the APAC Group and has been approved by the APAC Board of Directors which has ultimate responsibility for all entities within the APAC Group.

Our Approach to Human Rights

APAC strives to make a positive social, economic, and environmental contribution to the communities in which we operate. We recognise that to meet this goal, APAC must respect and uphold the dignity and human rights of all our employees, our service delivery partners, contractors, and the travelling public who utilise our airports.

Our Purpose

At APAC our purpose of "Creating Connections that Matter", is underpinned by:

CREATING	CONNECTIONS	MATTER
<ul style="list-style-type: none"> • Innovating • Building • Working together • Future focussed • Achieving our vision 	<ul style="list-style-type: none"> • Flight connections • People connections • Connecting VIC to the world • Our customer experience • Our employee experience • With our community 	<ul style="list-style-type: none"> • Meaningful work • A sense of purpose • Sustainable • Connected to economic growth & social development • Contributing to something better

Our Values

At APAC we have four core values that underpin how we interact with others, both internally within our staff and externally with our service providers, contractors, key partners, and the community. Our four core values are:

These values drive open and honest communication amongst all parties and a culture that constantly challenges itself to do better. We understand that an organisation underpinned by strong ethical behaviour is one of the best mitigations to modern slavery.



Be You – embracing individual uniqueness and personal identity; speaking respectfully and building trust with colleagues through honest conversations.



Think Big – thinking outside the square; embracing innovation; comparing ourselves to world's best and not next door.



Own It – doing what you say; taking responsibility for when things don't go well; playing our part in the company's success and having the confidence to make decisions.



Work Together – recognising success is a team effort; connecting and communicating with others both inside and outside of the business in a respectable way.

Our Vision

Our vision is to be "Australia's favourite airport destination".

What this means to us is that people come to the airport, not just because they must as part of their journey but because the airport is a place that people enjoy visiting. We acknowledge that we fundamentally cannot achieve this vision if modern slavery is present within our airports.



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Our Structure, Operations and Supply Chain

Structure

APAC is committed to delivering strong sustainable benefits for our diverse stakeholders through the performance of two key Australian aviation assets – Melbourne and Launceston Airports.

APAC is a privately held corporation owned by institutional investors, predominantly superannuation/pension funds.

The funds are owned, managed, or represented by the following five entities:

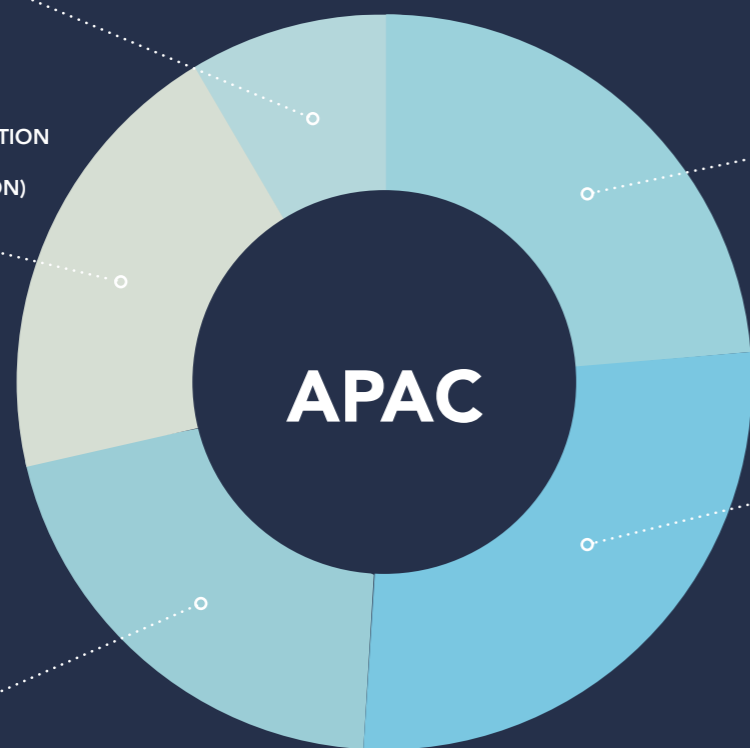
UTILITIES OF AUSTRALIA
(MANAGED BY HRL MORRISON & CO)
8.70%

SAS TRUSTEE CORPORATION
(MANAGED BY NSW TREASURY CORPORATION)
18.47%

FUTURE FUND
20.34%

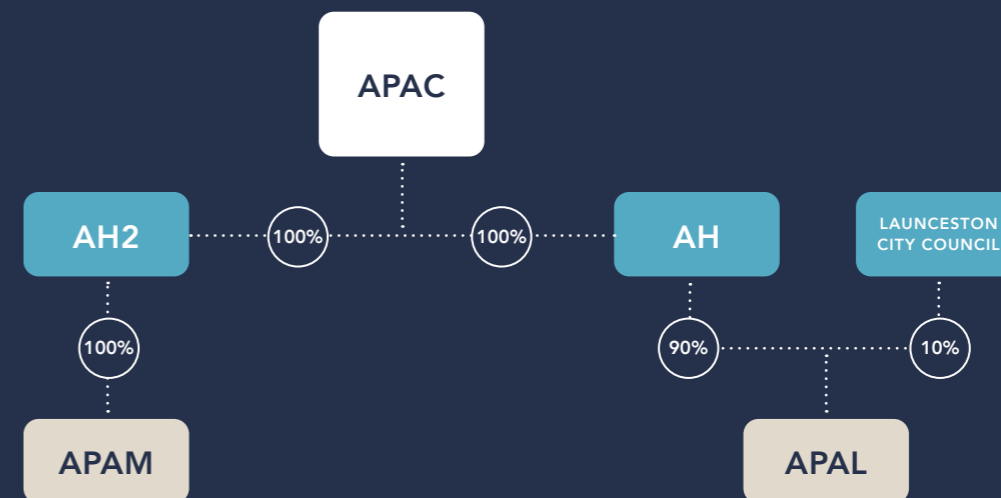
IFM INVESTORS
25.17%

AMP
27.32%



AH2 and AH are the immediate owners of each of APAM and APAL respectively and Launceston City Council has a 10% economic interest in APAL. APAC is the ultimate holding company of the corporate group.

APAM (in respect of Melbourne Airport) and APAL (in respect of Launceston Airport) are the airport lessee companies under a long-term lease with the Commonwealth of Australia. These leases grant each of these entities the right to manage Melbourne Airport (located in Tullamarine, Victoria) and Launceston Airport (located in Launceston, Tasmania).



APAM (in respect of Melbourne Airport) and APAL (in respect of Launceston Airport) are the airport lessee companies under long-term leases with the Commonwealth of Australia. These leases grant each of these entities the right to manage Melbourne Airport (located in Tullamarine, Victoria) and Launceston Airport (located in Launceston, Tasmania).

As at November 2022



Melbourne Airport

Melbourne Airport has been Victoria's gateway to the world for more than 50 years and operates curfew-free, 24 hours per day, seven days per week. The airport is located 22 kilometres northwest of Melbourne's central business district and is well connected to the city's freeway and arterial road network. Plans are progressing for a rail link connecting the airport to the suburban rail network via Sunshine.

The airport is close to major industrial areas and serves as a hub for freight and logistics, while providing employment to thousands of residents in nearby suburban growth corridors.

The airport has two intersecting runways, which are operated in different modes in response to wind direction or to reduce aircraft noise impacts. Planning and community engagement work is underway for a third runway to be built parallel to and west of the existing north-south runway.

The passenger terminal complex combines international facilities (Terminal 2) with three domestic terminals (Terminals 1, 3 and 4). This integrated terminal precinct enables Melbourne Airport to provide the shortest minimum connection time between domestic and international flights of all major Australian airports. Eighty aircraft parking stands serve the terminal precinct and accommodate the embarkation or disembarkation of passengers, loading or unloading of mail or freight, and fuelling, parking and maintenance.

There are approximately 20,600 full-time equivalent jobs supported on the precinct, and that workforce is continuing to rise as the COVID-19 recovery continues. Melbourne Airport makes a significant contribution to the Victorian economy as a key driver of tourism and trade-based industries that support jobs and generate growth. It is estimated that a typical daily international flight contributes more than \$109 million to the Victorian economy and supports more than 1,000 jobs per annum.



Launceston Airport

Launceston Airport is situated 15 kilometres south of Launceston. The airport serves as a domestic, regional, and general aviation gateway to Northern Tasmania for commercial aircraft, air freight, and private operators. Current facilities available to support aircraft operations include six domestic aircraft stands, three freight stands, and 15 general aviation stands. The three-storey terminal complex includes four dedicated boarding gates and a separate terminal houses Sharp Airlines' maintenance facility, national reservations centre and departure lounge.

The airport also provides a range of facilities and office accommodation to ancillary non-aviation businesses which are attracted to the benefits of operating in an

environment that has excellent connectivity and logistics links.

As the main aviation hub for Northern Tasmania, Launceston Airport is the second-busiest airport in the state. A key economic driver, the airport contributes \$81 million annually to the Northern Tasmania economy with a further \$24 million in flow-on impacts. The airport has a workforce of more than 550 direct and indirect employees.

Subsidiary Consultation

Key members from both APAM and APAL have been consulted in the development of this statement.



Operations

APAM

APAM operates through the coordinated efforts of seven business units working to deliver against a corporate strategy. The business units and their functions are as follows:

Aviation – The Aviation business unit is responsible for the day-to-day operation of the airport terminal and airfield. This incorporates an Integrated Operations Centre responsible for managing incidents, allocating aircraft to aircraft parking stands and airline flights to check in zones within the terminal. It includes airfield safety, airfield maintenance and airfield ground lighting teams who ensure that aircraft, vehicles, and pedestrians can safely manoeuvre across the airfield. The aviation team also includes airport security, business resilience and emergency response. They also take responsibility for the aeronautical business development and capacity planning responsibilities to continually grow the aviation business. The development and delivery of all aviation related infrastructure is also managed by this team.

Ground Transport, Public Affairs & Sustainability – The Ground Transport business unit is responsible for the safe operation of the roads and carparks within the airport precinct. This includes road maintenance, marshalling to keep pedestrians and vehicles safely separated within the forecourt and management of the various carparking offerings across the airport. They also take the lead on the development and delivery of future roads and car parking infrastructure to keep up with the demand within the precinct. This team also includes the corporate and public affairs team who engage with government and surrounding communities on all aspects of the airport operation and development. The environment and sustainability team are responsible setting and monitoring APAC's ESG targets along with ensuring that all operators at the airport consider the environment in their daily activities.

Commercial Property – The Commercial Property business unit has two key responsibilities being the property development and management portfolio and the management of the retail offerings both inside the terminal and within the wider airport precinct.

The property portfolio includes some of the largest warehouses in Australia, within the Melbourne Airport Business Park, through to commercial office space, hotels, and Australia's first wave park. The retail component includes the food and beverage and specialty outlets spread throughout the terminals along with airline lounges and service stations.

Engineering & Asset Management – The Engineering and Asset Management business unit is responsible for ensuring the airport can maintain its operations. This includes the utilities team who manage the water, waster water, electricity, gas and HVAC systems and the facilities maintenance team who maintain and clean the terminal buildings. This team also includes the engineering services development and delivery team who are responsible for ensuring that the services infrastructure is capable of supporting the future growth of the airport.

Finance, Technology and Risk – The Finance Technology and Risk business unit contains the majority of the corporate functions including treasury, finance, procurement, safety, risk, compliance, environment, legal and technology. The technology team maintain not only APAM's IT infrastructure but also provide the IT infrastructure to support almost all companies operating at the airport including critical systems like the baggage handling system and the airline check in systems.

People Experience and Marketing – The People Experience and Marketing business unit support the business from a human resources perspective and provide marketing support across the business. A large number of the corporate policies relating to Modern Slavery are owed by the People Experience and Marketing teams.

Strategy & Innovation – The Strategy and Innovation team is responsible for setting and monitoring the business' achievement of the corporate strategy in addition to supporting the development and achievement of the individual business unit strategies.

APAL

APAL operates in a similar fashion to APAM however on a smaller scale while being able to leverage many of the corporate functions from APAM.

Destinations Served



Our supply chain

APAC has a global supply chain comprised of approximately 2,000 suppliers split across Operational Expenditure (OPEX) and Capital Expenditure (CAPEX).

OPEX (26%)		CAPEX (74%)	
Facilities Maintenance and Utilities	17%	Head Contractors	42%
Security	12%	Consultants	14%
Professional Services	5%	Project Management Services	2%
Technology	3%	Environmental	2%
Transport	2%	Quantity Surveying	1%

These suppliers operate in a diverse range of industries, primarily service based and include technology support, consultancy, facilities management, construction and engineering, office supplies, cleaning, waste management and marketing. Our suppliers deliver a range of goods and services to the airport as part of the overall operation. APAC delivers a significant capital works portfolio which draws on the Victorian and Tasmanian construction sectors and their associated supply chains.

Suppliers are generally engaged as independent contractors and may be contracted on a long or short-term basis depending on the nature of the services.

The majority of suppliers directly contracted by APAC are located in Australia. Other countries where suppliers directly contracted by APAC are located include the United States of America, New Zealand, European Union, India, Singapore and the United Kingdom.

APAC is committed to operating ethically, fairly, in compliance with all relevant laws and in a socially responsible manner consistent with the expectations of our local communities. We also expect suppliers within our supply chain to act in the same way.



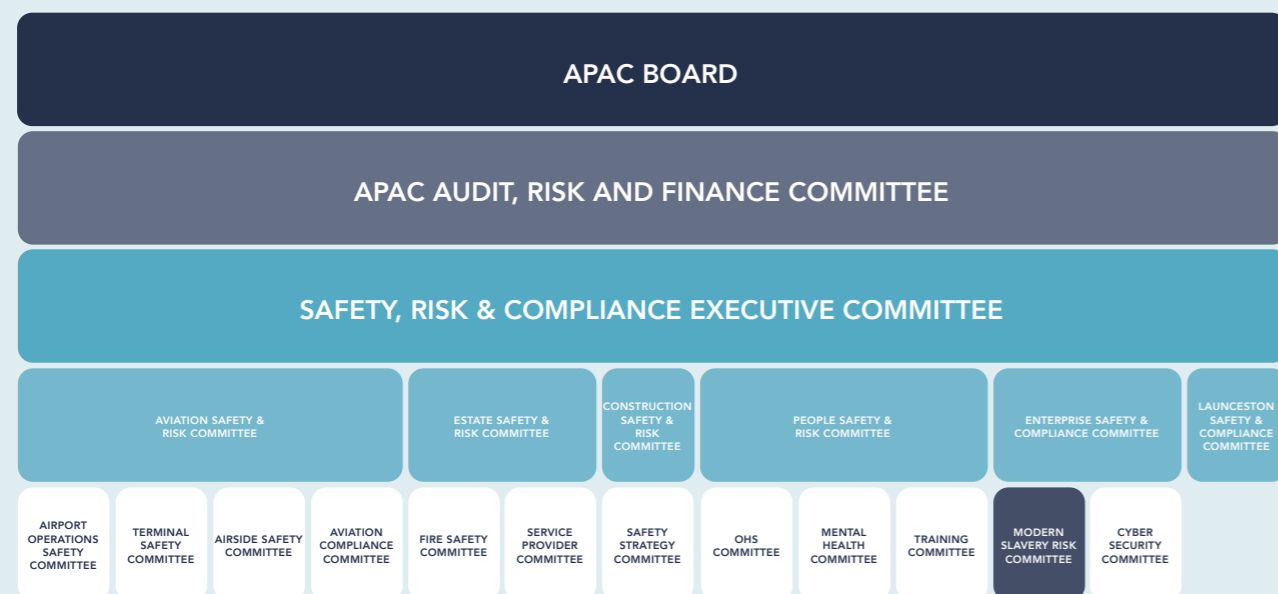
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Modern Slavery Governance Framework

Governance Structure

Risk management, including modern slavery risk management, is a key focus for APAC and is managed through the Safety, Risk and Compliance (SRC) governance structure. The SRC Governance structure is centred around the SRC Executive Committee

that reports into the APAC Audit, Risk and Finance Committee and ultimately the APAC Board. The SRC Executive Committee meets on a bimonthly basis and consists of the APAC Senior Leadership Team. The SRC Executive Committee has several sub-committees as depicted below.



The Modern Slavery Risk Committee is a sub-committee under the Enterprise Risk and Compliance Committee and is focussed on assessing and mitigating modern slavery risks. The Modern Slavery Risk Committee consists of key personnel from the Risk, Procurement and Legal teams and meets on a quarterly basis.

Modern slavery related risks are managed in accordance with APAC's Risk Management Policy and Framework. Business units are responsible for identifying, assessing, and monitoring modern slavery risks and their treatment on an ongoing basis through the risk champion network embedded into the Business Units.

The Risk, Legal and Procurement teams are responsible for monitoring compliance and organisational wide policies, such as the Procurement Policy which incorporates supplier risk assessments and standardised contractual terms in our contract suite.

Policies

The majority of policies are developed under the APAC banner and apply equally to APAM and APAL. Those policies not developed under the APAC banner are generally the specific operational policies relating to the specific operations of each airport. All policies go through a regular review process and several policies require sign off by the APAC Board due to their significance.

Code of Conduct – The APAC Code of Conduct underpins our ability to behave in a manner consistent with our shared values. It demonstrates how to practically apply those values in our day-to-day activities and as a result meet or exceed applicable legal requirements. The Code describes a common set of expectations for our conduct; however, it is not meant to provide specific guidance on every situation we may find ourselves. Rather, it is principle-based guidance that helps us think about “What is the right thing to do?”. It also provides guidance on where to go for further support and information if needed. This policy is approved by the Board of Directors.

Supplier Code of Conduct – The Supplier Code of Conduct draws upon international standards and APAC's Code of Conduct to set out the foundation of minimum standards and expectations of behaviour that APAC expects of its suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, privacy and supplier diversity. APAC wish to partner with vendors, contractors and consultants who commit to observing these principles not only in its dealings with APAC but throughout its own supply chain. This policy is approved by the CEO.

Speak Up – This policy sets out how eligible parties can confidentially make disclosures of matters of concern involving misconduct of the Company or its officers or employees. This includes how this can be done on an anonymous basis via an independent avenue as well as the support that will be provided by the Company. Eligible parties include all current and former team members, relatives or dependants of a current or former team member as well as any person working at either Melbourne Airport or Launceston Airport regardless of their contractual relationship with APAC, APAM or APAL. This policy is approved by the Board of Directors.

Risk Management Policy and Framework – The Risk Management Policy and Framework details the risk management process followed by APAC and defines the likelihood and consequences ratings to be used when assessing enterprise risks. Consequence ratings are categorised across the following metrics: safety, reputation, regulatory, environment, business interruption and people. This policy and the associated framework are approved by the Board of Directors.

Compliance Management Policy and Framework – The Compliance Management Policy and Framework formalises the approach to compliance management across each of the business units. This policy requires each business unit to develop specific plans on how they will comply with their obligations (legislative or otherwise). This policy and the associated framework are approved by the Board of Directors.

Procurement Policy – The Procurement Policy sets out the operational and behavioural standards that must be adhered to when procuring goods and services or engaging third party suppliers on behalf of APAC. This policy includes considerations for ethical sourcing (including modern slavery). This policy is approved by the CEO.



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Identifying and Assessing Modern Slavery Risks



Modern slavery risks are assessed using the APAC enterprise risk management framework which aligns to the ISO 20400 guideline. In line with the Guidance for Reporting Entities provided by the Federal Government APAC uses the UN Guiding Principles on Business and Human Rights as a basis for assessing actual and potential human rights impacts, including modern slavery.

APAC’s risk assessment focusses on three key elements; our internal workforce, our direct supply chain and beyond our direct supply chain to their suppliers and subcontractors. The risk assessment accounts for the following four key risk identifiers:

- **Vulnerable populations** – Groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. The level of worker vulnerability, and risk of poor labour practices and exploitation are recognised to be higher in contexts where base skill labour is relied upon.
- **High risk business models** – Business models that rely on third parties for the provision of services - often labour hire. Outsourcing reduces company visibility over third-party recruitment practices and provision of worker entitlements.
- **High risk sectors or categories** – Products and services regarded as having more significant inherent modern slavery risk – including industries that rely heavily on low- skilled labour and/or involve dirty, dangerous and difficult work.
- **High risk geographies** – Countries or regions which are known to have higher human rights (and modern slavery) violations or risks. High risk geographies include countries and regions vulnerable to bribery and corruption, or without strong labour laws and governance.



Internal Workforce

APAC internal workforce are engaged on either a common law contract (66%) or under a single Enterprise Agreement (34%). Those engaged under a common law contract are a very low risk in terms of modern slavery due to the individually negotiated contract and the inherent protections provided under common law.

Our Enterprise Agreement is a fully negotiated agreement with significant consultation with the participants and their union representatives. The Enterprise Agreement is renegotiated every 2-4 years to ensure that it remains current in terms of remuneration, benefits and working conditions. The Enterprise Agreement must also comply with the Fair Work Act and be certified by the Fair Work Commission. As a result, the modern slavery risk within those engaged under the Enterprise Agreement is also assessed to be very low.

Direct Supply Chain

APAC has conducted a combination of supplier self-assessments and targeted risk assessments to assess the risk of modern slavery within our direct supply chain. The risk assessments have been conducted in accordance with the APAC Risk Policy and Framework, utilising Global Slavery Index to support likelihood assessments based on the prevalence and vulnerability factors for the suppliers’ country of origin, including any parent companies.

APAC assesses the risk of modern slavery in our supply chain to be low. This is because the majority of suppliers that we directly contract with are located within Australia. Additionally, APACs major suppliers have policies in place to mitigate modern slavery risks under their own modern slavery obligations. APAC periodically reviews their policies and Modern Slavery Act Statements to ensure that they are meeting their obligations.

APAC continues to develop its commercial arrangements to ensure suppliers have an obligation to inform APAC of any activities that are proposed to be conducted offshore. This is achieved through the inclusion of specific clauses in our suite of standard contracts and through the legal review of any non-standard contracts.

Indirect Supply Chain

APAC recognises that there may be instances in which we are indirectly exposed to modern slavery practices from within our supply chains. Specifically, the cleaning services, office supplies, IT services and construction industries are sectors that APAC considers more likely to



be at risk of modern slavery practices occurring further down the supply chain, as follows:

- risk that raw materials used in office teas, coffees and foods are not fair trade, including that they may be obtained contrary to fair labour practices;
- risk of labour exploitation in the production of company uniforms (where used); and
- risk of unpaid or underpaid labour and excessive hours, including in relation to foreign workers and offshoring of any component of services, in connection with subcontracting in the construction, IT and/or cleaning sectors.

APAC also acknowledges that solar installations are considered an area of modern slavery risk in the construction sector. Solar installation works include complex and informal subcontracting, labour hire, often involving multiple sub-contracting arrangements, and low barriers to entry for labour hire providers. A predominantly migrant workforce also increases the risk in this area, due to worker reliance on recruitment intermediaries who may exploit this reliance, and / or due to language barriers.

Human Trafficking Risk

Human trafficking is a modern slavery risk that is present within the airport environment. The primary responsibility for mitigating the human trafficking risk is the Australian Border Force under the Department of Home Affairs National Action Plan to combat Modern Slavery 2020-25. APAC has established regular coordination meetings with senior Australian Border Force personnel to support the implementation of local measure to mitigate human trafficking. An example of this is provision of infrastructure and equipment to display digital messaging at key control points.

Mitigation and Remediation

APAC recognises that mitigating modern slavery risks within its operation and supply chain is an ongoing task and requires constant attention. The following key mitigations were implemented or progressed within FY22.

FY20 and FY21 Mitigations

The primary mitigations identified in FY20 relate to the APAC Code of Conduct, Supplier Code of Conduct and the Speak Up (Whistleblower) Policy. All three of these policies are considered key policies and are approved by the APAC Board. The Modern Slavery Committee conducted a review of each of the policies to confirm that they continue to align with modern slavery risk mitigation.

APAC Code of Conduct: It is mandatory that APAC team members read and sign their acknowledgment of, and agreement to, this code of conduct. A breach of the code of conduct is viewed as a serious matter that must be addressed and may lead to disciplinary action, including dismissal where appropriate. The code of conduct mandates that only suppliers which share APAC's commitment to lawful and ethical practices are engaged and that any doubts as to this are immediately reported to a manager.

Supplier Code of Conduct: Suppliers wishing to contract with APAC must read and agree to the terms of APAC's Supplier Code of Conduct as a condition of providing APAC with services. This process is incorporated in APAC's Procurement Policy and is integrated in our procurement process. This code of conduct requires suppliers to agree to a number of integral requirements, including rejecting all forms of child labour and forced labour and ensuring fair remuneration and work conditions for all team members.

Speak Up (Whistleblower) Policy: APAC maintains an independent, externally resourced hotline to which suspected instances of misconduct, including violation of human rights or breach of labour laws, can be reported anonymously. Concerns can be raised via a number of methods including via telephone, email and online through the supplier's web portal.

In FY21 the Modern Slavery Committee was established within the SRC governance structure and in parallel with the ongoing review of the relevant policies, APAC's focus shifted to the procurement aspects of the supply chain.

Supply Chain Modern Slavery Self Reporting Tools and Risk Assessments – Major APAC suppliers across CAPEX and OPEX spend participate in a modern slavery maturity assessment. This tool serves to confirm effectiveness of downstream controls and measures with respect to modern slavery throughout the APAC supply chain. This process is completed on an annual basis and utilised to inform ongoing supply chain risk assessments and associated controls within APAC's enterprise risk management framework.

Procurement and Supply Chain Controls – APAC requires all major suppliers to provide transparency and seek approval for all activities that are to be subcontracted or proposed to be delivered or supported from offshore locations. APAC assesses the risks of these activities prior to contracting or permitting such arrangements. Specifically, for technology related activities, APAC's cyber security policy requires supply chain activities are not conducted in high-risk geographies.

FY22 Mitigations

APAC recognises that mitigating modern slavery risks within its operation and supply chain is an ongoing task and requires constant attention. The following key mitigations were implemented within FY22.

Speak Up (Whistleblower) policy – The Speak Up policy was reviewed within FY22 and was subsequently approved by the Board in August 2022. Key changes to the policy included: extension of the policy to formally include suppliers of goods and services (previously captured under the disclosure service but not contained in the policy); improved clarity on what is classified as a protected disclosure and eligible recipients of a protected disclosure and the addition of support mechanisms contained in the Employee Assistance Program.

ESG Strategy – Melbourne Airport is one of the largest single site employment hubs in Victoria, and roughly 70% of the airport workforce live in the seven surrounding local government areas. As the aviation sector worked to rebuild from the impacts of COVID-19, Melbourne Airport looked for opportunities to link local jobseekers with potential employers. As part of those efforts, Melbourne Airport partnered with Brimbank Council to stage a mini-jobs fair at Sunshine which resulted in several candidates being offered positions. Other councils have expressed interest in similar ventures. Melbourne Airport is also working towards local procurement targets for major projects such as the proposed third runway, to ensure nearby businesses and communities' benefit from the increase in activity on the airport precinct.

Enterprise Agreement – APAC successfully negotiated a new four-year Enterprise Agreement, which received formal approval in May 2022. The vote received a 95.5% response rate – a clear demonstration of a highly-engaged workforce – with an overwhelming 94.3% of voters endorsing the agreement. This result followed a tumultuous period during the pandemic, in which time APAC staff voted in favour of a pay freeze in the final year of the previous Enterprise Agreement, forgoing their 2020 increase.

Stepping Forward Program – APAC implemented a program to support airport staff (internal staff and key service providers) in engaging with passengers. This has mitigated modern slavery risk in two ways.

Firstly, airport staff are more likely to interact with passengers who may be passing through the airport under duress and can alert Australian Federal Police or Australian Border Force to act. Secondly, the program has created direct connections between our service providers staff at all levels with the APAC management team enabling issues to be raised directly.

Proposed FY23 Mitigations

The following key mitigations are planned to be implemented in FY23:

Supplier Survey – APAC has partnered with Safetrac Pty Ltd to provide an online framework and platform to audit and evaluate our supply chain. APAC will undertake this audit across 200 of our most high-risk suppliers and contractors to ensure that modern slavery risks are mitigated by our supply chain. Audits will commence in Q1 of 2023.

Training – As part of the engagement with Safetrac Pty Ltd they will be providing Modern Slavery Legislation training for key account and contract managers to assist them in recognising the risks of modern slavery within our operations and supply chain. Training will commence in Q1 of 2023.

Remediation

APAC seeks to avoid causing or contributing to human rights violations across our or our business partners' operations and supply chains. We encourage all our service providers, contractors, consultants, and key partners to report and express any concerns relating to our activities and suspected violations of our policies, including via the mechanisms described in our Speak Up (Whistleblower) Policy.

As outlined in the Policy, if a grievance is raised, APAC establishes a Speak Up Committee to assess the information reported and determine an appropriate course of action which depending upon severity may incorporate an independent external investigation. APAC is committed to investigating, addressing and responding to any concerns and taking the appropriate corrective actions if required.

No modern slavery related issues were reported to APAC and no formal remediation plans were issued in FY22.

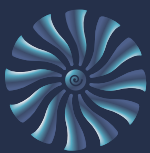
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Monitoring and Evaluating our Performance

APAC recognises the need to continue to regularly review the measures we have implemented to ensure that they are effective at identifying any modern slavery taking place in our supply chain. To achieve this APAC has established a Modern Slavery Committee under the Enterprise Risk and Compliance Committee. The Modern Slavery Committee is responsible for:

- Regularly reviewing the internal risk assessment processes to ensure that they account for modern slavery risks and human rights more broadly.
- Regularly reviewing the supplier risk assessments developed during procurement activities to ensure modern slavery risks are mitigated in new contracts.
- Conducting regular assessments using the third-party risk assessment tool
- Monitoring the adherence to modern slavery mitigations within contracts by overseeing regular audits and inspections.
- Monitoring any modern slavery related disclosures made to our Speak Up Hotline and identifying any trends.
- Reviewing our modern slavery risk mitigations against industry best practice.
- Periodically reviewing key policies relating to modern slavery risk mitigation such as the Code of Conduct, Supplier Code of Conduct and the Speak Up (Whistleblower) Policy





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