

FY25 Modern
Slavery Statement



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Auckland Airport supports Australia's Modern Slavery Act 2018 (Act). We are a business that strives for improvement and we are constantly reviewing our operations to identify and mitigate all aspects of risk. Our values of 'All in - Tātou Tātou, Know How - Kōkiri Tahi and Let's Go - Karawhiua' underpin our commitment and approach to raising awareness of human rights violations in our supply chains and operations.

This Modern Slavery Statement is made by Auckland International Airport Limited (ARBN 085 819 156) ('Auckland Airport'), together with its subsidiaries, (the 'Auckland Airport Group'). It describes the actions Auckland Airport Group has taken to address potential human rights violations in our operations and supply chains during the financial year that ended 30 June 2025 (FY25).

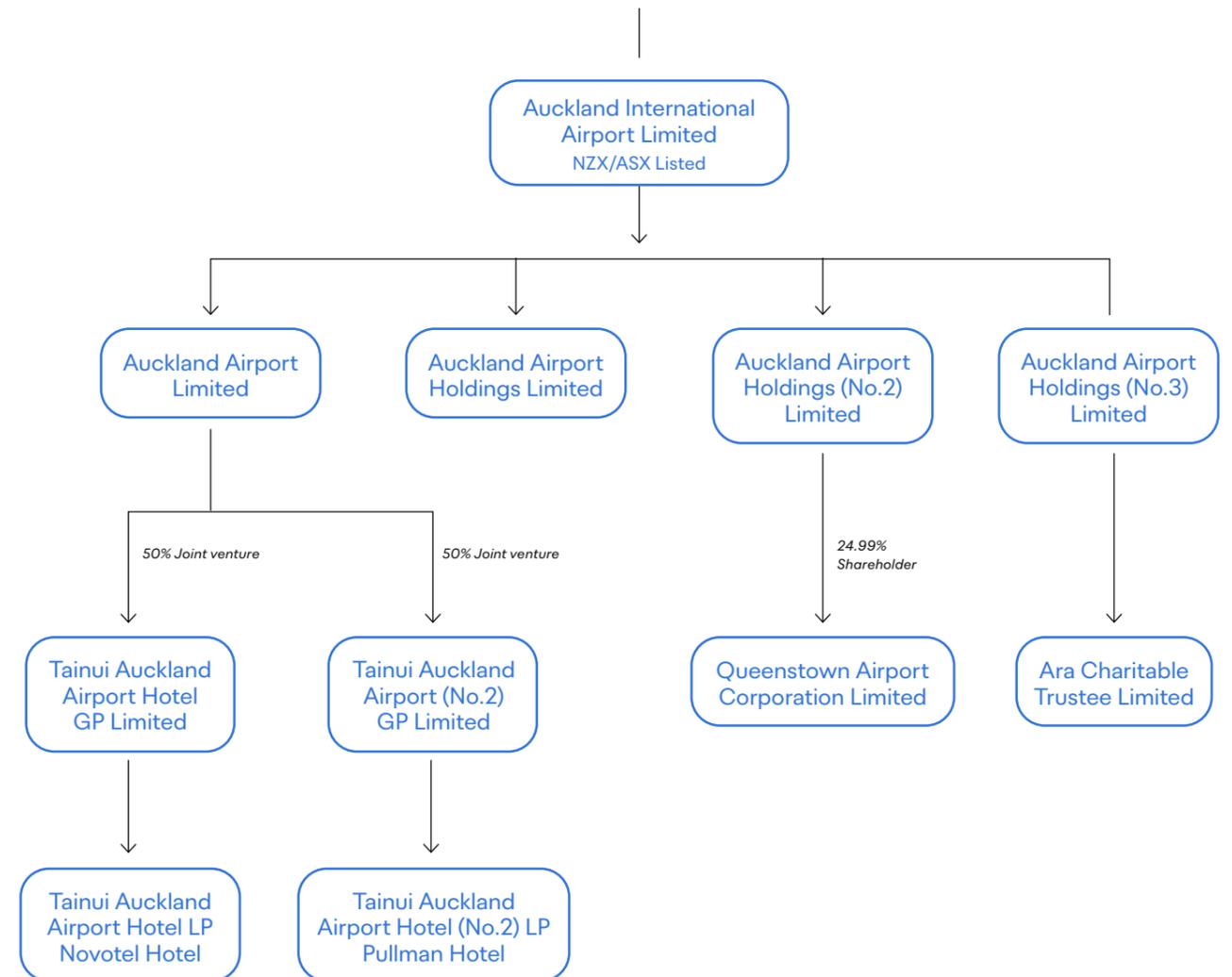
Structure, operations and supply chains

Our structure

Auckland Airport is a limited liability company, incorporated in New Zealand on 20 January 1988 and listed on the New Zealand Stock Exchange on 28 July 1998. Auckland Airport was registered in Australia as a foreign company under the Corporations Law on 22 January 1999, was granted Foreign Exempt Listing Entity Status by the Australian Stock Exchange on 22 April 2016, with its shares quoted on the Australian Stock Exchange effective 1 July 2002.

The structure of the Auckland Airport Group is set out below.

Auckland Airport company structure
As of 30 June 2025



Our operations

Auckland Airport is New Zealand's largest airport and a gateway to New Zealand.

In financial year 2025 Auckland Airport welcomed 18.7 million passengers, had 157,000 aircraft movements and connected Auckland to 42 international destinations and 23 domestic destinations.

Auckland Airport's key operations and revenue streams are aeronautical, consumer and investment property.¹

Aeronautical:

Auckland Airport is New Zealand's gateway airport, providing infrastructure and services to facilitate the movement of aircraft, passengers, and cargo.

Consumer:

Auckland Airport's consumer segment includes the provision of amenities for retail businesses both in the terminal and within the surrounding precinct. There are 98 retail tenants (across both the domestic and international terminal). Of these, 42 sell various goods and 43 are food and beverage retailers. The balance of services included baggage wrapping, foreign currency exchange, vending, storage lockers and telecommunication providers. Mānawa Bay, Auckland Airport's premium outlet shopping centre development on precinct commenced operation in September 2024, with 92 retail tenancies, 15 F&B operations and 7 services including currency exchange, hairdressing, massage, clothing alternations and storage lockers. For clarity, the supply chain of individual tenants are not considered part of Auckland Airport's supply chain, and therefore outside of the landlord's reporting scope.

The wider precinct (exclusive of freight, logistics and cargo) consists of 9 hangars, 14 office tenancies, 14 food and beverage retailers, 10 services, 3 hotels, 7 rental car operators and 3 entertainment facilities.

This segment of our business also includes the operation of car parking facilities and three hotels on the airport precinct, Te Arikini Pullman

Auckland Airport, and Novotel Auckland Airport (operated by two joint ventures with Tainui Group Holdings Limited) and ibis Budget Hotel, as well as digital channels. These activities enhance Auckland Airport's customer proposition by providing important services in and around the airport that are valued by customers travelling through the precinct.

Investment property:

The investment property portfolio has grown strongly to over 550,000m² of facilities ranging from logistics and distribution warehouses to office buildings. The investment property portfolio is now valued at over \$3.4 billion, with an annual rental income of \$192.1 million. Auckland Airport owns approximately 1,500 hectares of contiguous land, with 147 hectares of this still available for development.

Auckland Airport workforce

As of 30 June 2025, Auckland Airport employed 840 people. Approximately 74% of our people are employed on individual employment agreements and 26% on collective employment agreements.

All of our employees² are based in New Zealand and recruitment is either undertaken by our internal People Experience Team or by external recruiters managed by our People Experience Team.

We have an outsourced model for many services, including construction, digital support, cleaning, property management, car park operations and property maintenance, which are more fully described in the **supply chain section**.

All suppliers and consultants are bound by our Supplier Code of Conduct.

¹ For more detail, please refer to our annual report and financial statements available on our website

² We have one Contractor who is primarily based in China



Our purpose and values

Auckland Airport is always working for New Zealand. Almost 60 years on, Auckland Airport still inspires and connects those with an adventurous spirit – a unique 1,566-hectare precinct of travel, enterprise and trade, entertainment, dining, shopping and hospitality.

Auckland Airport is for the world we'll travel tomorrow. By focusing on the pillars of our sustainability framework – Protect Planet, Empower People and Act Consciously – we're committed to creating enduring value and positive impacts. For more information visit our website: corporate.aucklandairport.co.nz/sustainability

Our values are: All in – Tātou Tātou, Know How – Kōkiri Tahī, and Let's Go – Karawhiua, and we expect our suppliers to share our values.

Our values are about how we collectively show up for each other and all our customer groups. They are central to the culture we want to live and breathe here at Auckland Airport – our people are passionate about them and put them into action every day.

Tātou Tātou

All In

We strengthen our team when we look out for each other. Putting people first creates a sense of connection and belonging. We know everybody makes a difference, so we have each other's backs, and appreciate each other, day in, day out.

People first

- Seek understanding
- Acknowledge others
- Empathise & support
- Diverse & inclusive

Kōkiri Tahī

Know How

We're a diverse team united by our ability to solve complex and challenging problems. We respect and value progressive thinking and different perspectives, collaborating together with shared high standards to deliver an excellent experience for all at Auckland Airport.

Explore & solve together

- Curious & open
- Bring your voice & share your skills
- Unite & collaborate
- Right people in the room

Karawhiua

Let's Go

Our mahi is nationally significant. We strive for excellence, taking pride in doing high quality work, that will have a positive impact on our community and visitors alike, for generations to come.

Challenge yourself

- Take pride
- Act with intent & integrity
- Keep your word
- Deliver excellence



Supply chain

As of 30 June 2025, Auckland Airport Group engaged directly with more than 967 suppliers³ from 18 countries, spending NZ\$1,038,000,000. Auckland Airport's supply chain is diverse and includes both direct and indirect suppliers.

What we source

Auckland Airport procures services and goods not for resale:

Services:

Including (but not limited to) construction services, building and grounds maintenance, roading services, car park operations, cleaning services, security, digital technology services, baggage system maintenance services, medical support, employee assistance, bus operations, passenger lounge operations, utilities, marketing services, recruitment, and training.

Goods not for resale:

Including (but not limited to) Personal Protective Equipment (PPE), uniforms, office equipment, CCTV cameras, display screens (FIDS), IT hardware, vehicles, airbridges, EV chargers and new airport infrastructure built on site by construction contractors including roads, taxiways, airfield aprons, upgraded runway slabs, utility networks (e.g. water, wastewater, gas, electricity, aviation fuel), airport terminals, car parking facilities and industrial, commercial and office rental properties.

Where we source from

Approximately 86% of our direct procurement spend⁴ was with New Zealand suppliers. Some of our suppliers are New Zealand entities, being a company that is resident in New Zealand for income tax purposes, however, are head-quartered overseas.

Operational expenditure represented 14% of our direct procurement spend:

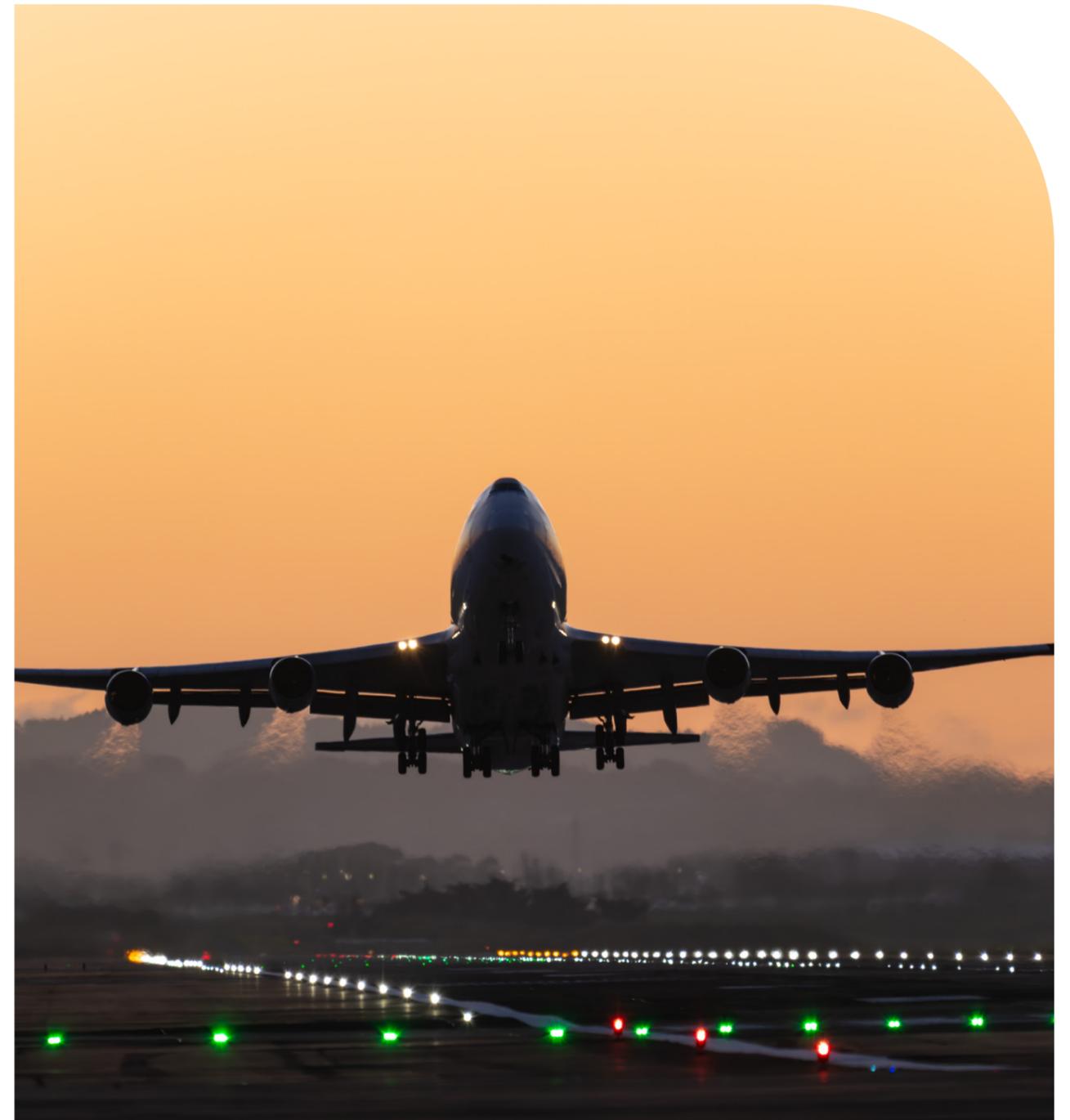
- Outsourced operations represented 60% of direct operational expenditure including: cleaning, security, passenger facilitation, parking related services, utilities, and building asset maintenance
- IT operational costs represented 15% of direct operational expenditure across provision of IT operations, system support, and licensing.
- Activities such as corporate travel, health and safety supplies, marketing and promotion, professional services, office supplies, and compliance costs represented 25% of total operational expenditure.

Capital expenditure represented 86% of our direct procurement spend including:

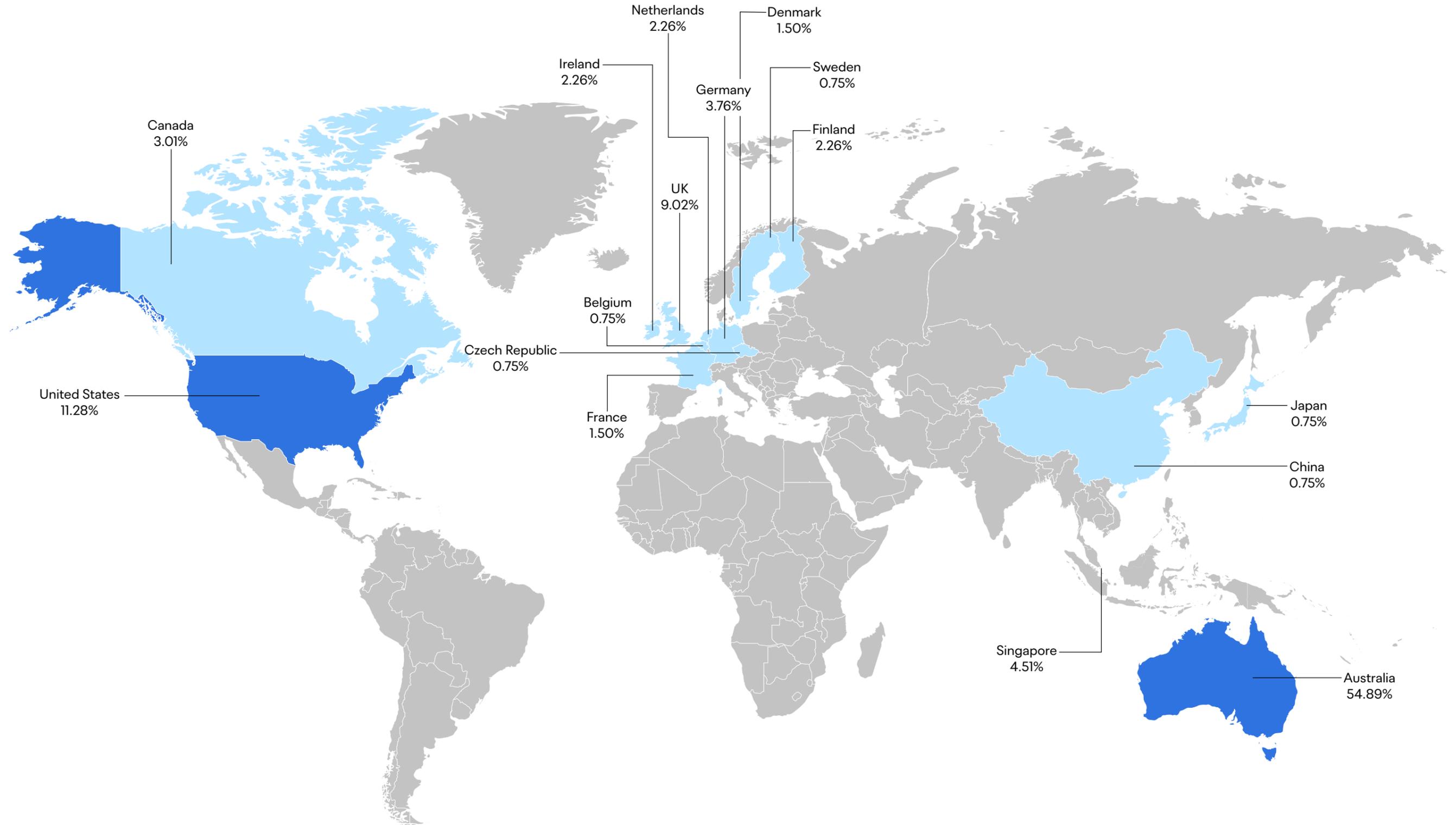
- Construction;
- Professional services;
- Construction related materials and equipment; and
- Technology systems and infrastructure.

³ Any supplier to Auckland Airport that we have an annual spend with over \$1,000 NZD

⁴ Direct procurement spend refers to spend with suppliers that Auckland Airport has a direct contractual relationship with



Spend by country - rest of world summary



Policies and governance

Audit and Financial Risk Committee and Safety, Sustainability and Operational Risk Committee

Auckland Airport's Board holds ultimate responsibility for risk oversight, supported by two key committees: the Audit and Financial Risk Committee (AFRC) and the Safety, Sustainability and Operational Risk Committee (SSORC).

- AFRC focuses on financial and climate reporting, financial risk management, internal controls, and oversight of both internal and external audit functions.
- SSORC monitors enterprise-wide processes for managing non-financial risks and assists the

Board in fulfilling its governance responsibilities for health, safety and wellbeing, environmental management, sustainability performance, modern slavery and operational risk management and compliance.

A number of policies, procedures and standards are in place to assist Auckland Airport in upholding and protecting human rights. These policies apply to directors, employees, contractors, and consultants. They also guide engagement with our suppliers. The policies listed below (with the exception of the Procurement Policy) can be located on Auckland Airport's Corporate Governance webpage.

Modern Slavery Policy

The Modern Slavery Policy details our commitment to identify, assess, prevent and remedy human rights violations across our business and within our supply chains. The policy underpins our business engagement practices and guides our engagement with suppliers.

Supplier Code of Conduct

Our Supplier Code of Conduct is guided by the core principles in the UN Global Compact, the United Nations Universal Declaration of Human Rights, UN Convention of the Rights of the Child and the International Labour Organisation Core Conventions. The Supplier Code of Conduct details guiding principles and expectations in relation to the business practices of our suppliers, including the expectation that the business practices flow into their own supply chains.

The Code is publicly available on our online procurement portal and referred to in all Procurement sourcing documents (e.g. Request for Proposal), contracts, and our Purchase Order terms and conditions.

Whistleblower Policy

The Whistleblower Policy includes protections for all current, former and temporary employees, directors and all persons working for, on behalf of, or at Auckland Airport (including but not limited to) agency workers, volunteers, contractors, consultants, secondees and suppliers, who wish to raise concerns in relation to real or suspected human rights violations.

The policy documents Auckland Airports commitment to acting ethically by engaging in sound practices, respecting others and accepting responsibility for our behaviours, which are set out in the Ethics and Code of Conduct Policy. It also documents the process to raise any concerns to either the Independent Whistleblower Service or to Auckland Airport's Company Disclosure Officer.

Ethics and Code of Conduct Policy

The Ethics and Code of Conduct Policy sets out the expectation of all Directors, employees, consultants and all other people when they

represent

Auckland Airport to act ethically by engaging in sound practices, respecting others and accepting responsibility for their behaviour.

Risk Management Policy

The Risk Management Policy sets out the role all staff have in risk management. While the Board has ultimate responsibility for reviewing and ratifying the risk management structure, processes and guidelines which are to be developed, maintained and implemented by Management, the active identification of risks and implementation measures are the responsibility of all staff. The policy is designed to promote a culture which ensures a proactive and consistent approach to identifying, mitigating and managing risk (including that of any real or threatened human rights violations).

Enterprise Risk Management Framework (ERMF)

The Enterprise Risk Management Framework includes Auckland Airport's approach to risk management in relation to modern slavery risk.

Procurement Policy

The Procurement Policy reflects Auckland Airport's commitment to best practice contracting and procurement principles, by detailing the governance and standards expected for procurement activities at Auckland Airport. The Procurement Policy was reviewed and updated in 2025 with a specific section for compliance with the Modern Slavery Policy, focusing on ethical sourcing and prevention of modern slavery in our supply chain.

Sustainability Policy

The Sustainability Policy defines the fundamental principles of Auckland Airport's sustainability approach and documents the commitment to operate in a reasonable and sustainable manner, delivering environmental, social and wider economic value to all stakeholders.



Identification of modern slavery risks in our operations & supply chain

Auckland Airport has identified the following potential modern slavery risk areas in its operations and supply chains.

Operations

Employment:

As all Auckland Airport employees are either directly employed by Auckland Airport or under a collective employment agreement, we consider this aspect of our business as having a low modern slavery risk.

Subsidiaries:

Two of the Auckland Airport Group subsidiaries are partial owners of hotel and airport entities that have operations in New Zealand. Having limited control reduces the oversight of the day-to-day operations of these entities, which could pose a risk of modern slavery, albeit Auckland Airport employees appointed to the boards of these entities are able to question management about these risks and demand corrective action if necessary.

Supply chains

Contractor risk:

While we usually engage New Zealand based suppliers in our capital projects, we recognise that those suppliers typically have suppliers of their own who, in turn, rely on other suppliers. This depth poses a risk of modern slavery practices due to the lack of transparency of our Tier 1⁵ suppliers' supply chains, so Auckland Airport is committed to constant engagement with our Tier 1 suppliers to identify and address potential risk.

A considerable portion of our operational expenditure is through engagement with New Zealand based suppliers for provision of outsourced services such as mechanical and electrical maintenance, cleaning, ground maintenance, and security but we recognise that many of these services rely upon the provision of low cost labour, so Auckland Airport intends to continue to work with our suppliers to identify

and address labour-related risk through their supply chain over the next two years.

Use of off-shore vendors to deliver certain IT, marketing and consultancy services also present a risk of modern slavery to Auckland Airport.

Goods not for resale risk:

This area may also present a risk as items such as Personal Protective Equipment (PPE), uniforms, office equipment, CCTV cameras, display screens (FIDS), IT hardware, vehicles, airbridges, EV chargers, will be influenced by the employment conditions where these products are made as well as the materials used.

Human trafficking:

We recognise that Auckland Airport is a major international gateway into New Zealand and a potential entry point for trafficked persons. We will continue to work with Government agencies who are responsible for protection of our border and support them in their efforts in this regard.

⁵ Auckland Airport defines Tier 1 suppliers as those suppliers that directly supply goods, materials or services to our company and subsidiaries, while Tier 2 suppliers and below are defined as those companies that supply goods, materials, or services to the supplier at the next higher level in the supply chain.



Actions taken to assess & address modern slavery risks

Auckland Airport's actions to assess and address modern slavery risks is an area of continuous improvement.

In FY25 we continued to undertake steps to deepen our understanding and assessment of modern slavery risks in our supply chain. Auckland Airport established a cross-functional working group to oversee Auckland Airport's ongoing obligations to manage modern slavery risks.

Supply chains

Auckland Airport recognises that our suppliers often have suppliers of their own who, in turn, rely on other suppliers. This layering poses a risk of modern slavery practices due to the lack of transparency of these supply chains. In June of FY25, we replaced our existing modern slavery software with a more comprehensive platform that provides greater visibility into our supply chain from Tier 1 and beyond.

Software Solution for Supply Chain Monitoring - Fair Supply

During FY25, Auckland Airport identified that the platform previously used to manage Modern Slavery questionnaires was no longer meeting organisational needs, with limitations in both functionality and usability. A procurement process was undertaken to review available market solutions, resulting in the selection of Fair Supply - a platform that provides enhanced analytics and functionality to monitor and assess modern slavery risks across our supply chain.

Fair Supply enables greater visibility into supplier operations, country-of-origin exposure, and sector-specific risks. This allows Auckland Airport to better understand the nature, scale, and potential impact of modern slavery risks, and to prioritise mitigation efforts accordingly. The platform also assigns an overall risk profile based on aggregated company risk ratings across our supply chain.

For FY25, Auckland Airport's overall modern slavery risk profile using this software was assessed as "low", with no suppliers identified as presenting "moderate-high" or "high" risk.

Working with our suppliers:

Updated processes and templates were implemented in our procurement processes, which included:

- documentation which includes a risk assessment for high-risk goods and services in pre-procurement planning.
- pre-screening of potential suppliers using Fair Supply to assess their modern slavery risk profile prior to the commencement of a procurement process. This early visibility helps identify any higher-risk suppliers before engagement, supporting more informed sourcing decisions and targeted due diligence or mitigation.

During a formal procurement process, potential suppliers may still be required to complete additional modern slavery questionnaires where their risk profile indicates this is necessary, and all assessment results are captured within the Fair Supply platform.

All of Auckland Airport's precedent supply contracts include a modern slavery clause which underpins the requirements for a contractor to warrant that it does not, and will not, engage in modern slavery practices. It further imposes an obligation on the supplier to report all instances of actual or suspected instances of modern slavery, and to provide ongoing training to its employees to identify instances of modern slavery. There is also an express requirement in Auckland Airport's procurement practices to oblige all suppliers to comply with our Supplier Code of Conduct, which was updated in FY25 to specifically call out modern slavery, human rights, and child labour.

Training and building awareness:

Auckland Airport appreciates that a large portion of the suppliers it engages with are New Zealand based suppliers who are currently not subject to compliance with modern slavery laws. Auckland Airport is committed to working with New Zealand suppliers to raise awareness of modern slavery and created a bespoke modern slavery guide to potential and current suppliers to assist with their modern slavery awareness and understanding of key supply chain risks.



Auckland Airport continues to provide modern slavery training to its key internal stakeholders. The training provides an understanding of modern slavery, how to recognise signs of modern slavery and the key risks and impacts to the business.

Auckland Airport will continue to work with both internal and external stakeholders to raise awareness of modern slavery, including providing annual refresher training.

Ethics and Code of Conduct and Whistleblower modules

In financial year 2025 Auckland Airport launched an Ethics and Code of Conduct and Whistleblower e-Learning pathway that was provided to all

Auckland Airport employees and directors. The e-Learning pathway is a mandatory training requirement for all new Auckland Airport employees and is updated and refreshed in line with any review of the policies.

Human trafficking

Auckland Airport recognises the unique role it has to play in eradicating modern slavery in its capacity as being New Zealand's largest owner and operator of an airport, with millions of customers travelling through our terminals every year. Both the New Zealand Police and New Zealand Customs Service have significant representation on Airport to facilitate oversight of the human trafficking risk.

Assessing effectiveness of our actions

For FY25, assessing the effectiveness of each of the actions is summarised below:

- **Policies & procedures:** from a governance perspective, the Safety, Sustainability and Operational Risk Committee and the Audit and Financial Risk Committee routinely reviews our risk position and effectiveness of policies and procedures in place to reduce and mitigate risk. Further, compliance with policies and procedures forms part of performance reviews for employees, contractors and relevant third parties. Particular to the Whistleblower policy, we record any receipt of, and responses to, complaints made under the whistle-blower policy in relation to human rights violations.
- **Supply chains:** ensuring we are working directly with our suppliers and recording receipt, awareness and adherence to our commitment to protecting human rights under our Supplier Code of Conduct.
- **Human trafficking:** recording incidence rates of potential or suspected human trafficking by keeping open lines of communication with New Zealand Government agencies to make sure there is transparency throughout immigration procedures and Auckland Airport is aware of any such incidences.

Auckland Airport is not aware of any instances of modern slavery in its operations or supply chain. During FY25, no whistleblower reports were received in relation to suspected or actual modern slavery breaches.

Going forward

In parallel with the actions set out to mitigate any potential modern slavery risks in our supply chains, we plan to develop targets that will increase in sophistication to specifically measure our effectiveness in progressing towards a commitment of zero-tolerance to modern slavery and human rights violations.

Practical steps and targets for FY26

- To work with key suppliers and create an action plan to ensure any risks are reported, mitigated, or removed.

- To ensure that anyone involved in procurement at Auckland Airport identifies potential risks before commencing a formal tender process through usage of the Fair Supply due-diligence screening tool.
- To finalise a Modern Slavery standard operating procedure documenting the process Auckland Airport will follow if modern slavery is suspected or identified in our operations or supply chain.
- To continue to educate all employees, directors and all people working for, on behalf of, or at Auckland Airport (such as volunteers, contractors, consultants, secondees and suppliers) on the availability of the independent whistleblower services through campaigns.
- To continue to provide modern slavery training for new employees and contractors to complete as part of their induction, and ongoing 'refresher' training for existing employees and contractors who are involved in the management of supply contracts or sourcing activities. Auckland Airport will further advance training by launching a modern slavery training module.
- To continue to monitor regulatory and legislative trends in Australia and any consultation by the New Zealand government on a potential Modern Slavery Act.

To assess the effectiveness of our proposed actions, in FY26 we plan to:

- Report on modern slavery as an 'identified risk' to the Safety, Sustainability and Operational Risk Committee;
- Actively track the modern slavery training to ensure employees, contractors and consultants undertaking procurement activities have the requisite modern slavery risk awareness to be undertaking any business with suppliers.
- Report on the progress of the achievement of the practical steps and targets for FY25 twice a year to the Safety, Sustainability and Operational Risk Committee.

Beyond FY26, Auckland Airport intends to track its performance and assess the quality and effectiveness of our actions by recording and reporting on modern slavery risk, monitoring the percentage of Auckland Airport employees

undergoing modern slavery awareness training, monitoring the number of complaints received and remedied under Auckland Airport's whistle-blower policies, and continuing to encourage the reporting of any unethical behaviour or other wrongdoing.

Auckland Airport fully endorses the Modern Slavery Act and is committed to achieving a zero-tolerance approach to modern slavery through our operations and supply chains.



Consultation

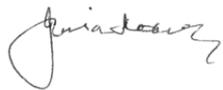
Auckland Airport is committed to developing a robust and comprehensive response to modern slavery. The same policies, procedures and risk frameworks that are in place for Auckland Airport apply to the Auckland Airport Group.

The Auckland Airport subsidiaries detailed above have directors that are all executive level employees of Auckland Airport. All directors of the subsidiaries have been consulted with in relation to this statement and are aware of their obligations in identifying, assessing and addressing risks posed by modern slavery to the entities they are directors of. All the directors of the subsidiaries have reviewed and endorse this statement.

This statement has been prepared in consultation with the cross-functional working group that work together to drive responsible procurement for Auckland Airport. It has been reviewed by our Chief Executive.

This statement was approved by the Board of Auckland International Airport Limited on 18 November, 2025.

Signed:



Julia Hoare
Chair
Auckland International Airport Limited

