

# SYD



2021  
Modern Slavery  
Statement



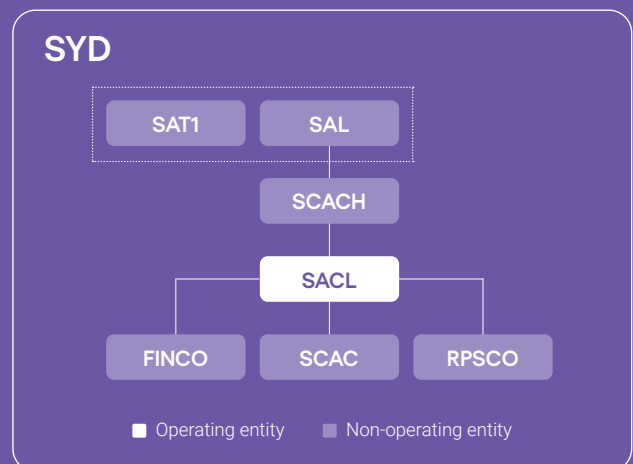
## About this report

This statement is a joint Modern Slavery Statement covering the activities undertaken during the year ended 31 December 2021 by the entities in our structure with reporting obligations under the Modern Slavery Act 2018 (Cth), which together, for the purposes of this statement, are defined as SYD.

### SYD comprises:

- Sydney Airport Limited (SAL)
- Southern Cross Airports Corporation Holdings Limited (SCACH)
- Sydney Airport Corporation Limited (SACL)
- Southern Cross Airports Corporation Pty Limited (SCAC)
- Sydney Airport Finance Company Pty Limited (FINCO)
- Sydney Airport RPS Company Pty Limited (RPSCO)
- Sydney Airport Trust 1 (SAT1)

At 31 December 2021, our corporate structure consisted of a stapled vehicle comprised of ASX-listed entities Sydney Airport Limited and Sydney Airport Trust 1 (SAT1). The Trust Company (Sydney Airport) Limited (TTCSAL) was the Responsible Entity (RE) of SAT1.



## A message from our Chair and CEO



**David Gonski**  
Chairman,  
Sydney Airport Limited



**Geoff Culbert**  
Chief Executive Officer,  
Sydney Airport Limited

### Our approach to responding to modern slavery is informed by our values, our commitments and international business and human rights frameworks.

The year 2021 will go down as one of the worst on record for Sydney Airport, with passenger levels regressing to levels not seen in decades and a significant impact on the 800 organisations and thousands of workers who call the airport home.

At Sydney Airport one of our values is to 'always do the right thing' and so despite the ongoing challenges from the COVID-19 pandemic we remain committed to tackling modern slavery, one of the most pressing challenges of our time.

This statement sets out our approach to managing modern slavery risk and the improvements we have made throughout 2021.

These include the development of new modern slavery awareness training, which we rolled out to our people in high-risk roles. We introduced a new third-party supplier platform to support risk identification in our supply chain and developed a new modern slavery response process.

In 2021, SYD did not identify any instances of modern slavery in our operations or supply chain.

Combating modern slavery is a complex and ongoing process. We recognise airports have a unique role to play in fighting modern slavery, as millions of passengers' travel through our terminals every year.

As Australia re-opens its borders and millions of passengers once again travel through airport terminals every year, the unique role airports play in fighting modern slavery is highlighted.

In 2022, as we continue to deepen our understanding and assessment of risk in our supply chain, we remain committed to working with the Sydney airport community to continue to fight and raise awareness of modern slavery.

Sydney Airport Limited approves this statement in its capacity as principal governing body under section 14(2)(d)(iii) of the Modern Slavery Act 2018<sup>1</sup>

**David Gonski**  
Chairman, Sydney Airport Limited

**Geoff Culbert**  
CEO, Sydney Airport Limited

### Key areas of action 2021



#### Risk assessment

Introduced third-party modern slavery risk assessment platform as part of our supply chain risk assessment



#### Controls

Continued to strengthen controls in place to help mitigate modern slavery risks



#### Management of modern slavery reports

Developed specific requirements for managing modern slavery reports made via SYD's whistleblower hotline



#### Developed new Modern Slavery Response Procedure

Developed a SYD-specific Modern Slavery Response Procedure to guide SYD through management of instances of modern slavery



#### New internal training

Developed new SYD modern slavery awareness training

1. The Modern Slavery risks relating to SACL are operational matters which are overseen by the Board of SAL, as the ultimate holding company of SACL, not SAT1. Accordingly, it is not practicable for TTCSAL as responsible entity of SAT1 to sign under s14(2)(d)(i) or (ii). Therefore, this Modern Slavery Statement has been approved under subparagraph 14(2)(d)(iii) by SAL





# Operations

**SYD operates Australia’s gateway airport, a critical piece of national infrastructure located in Sydney, New South Wales.**

Sydney Airport welcomes millions of passengers every year. It is one of the oldest continually operating airports in the world, celebrating both its centenary and the arrival of its billionth passenger in 2019.

The key operations and revenue streams of SYD are aeronautical services, property and car rental, retail, parking and ground transport.

## SYD operations and revenue streams<sup>1</sup>

 <p><b>Aeronautical Services</b> for passengers, freight and aircraft movements</p>	 <p><b>Property and Car Rental</b> with a real estate portfolio that includes hotels and freight facilities</p>	 <p><b>Retail</b> with retail stores across three terminals and advertising sites</p>	 <p><b>Parking and Ground Transport</b> including car parks and facilitation of access to and from the airport</p>
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## SYD workforce

SYD directly employs 469 people, the majority (96 per cent) in permanent roles. Our employees are engaged by either a direct contract or under collective bargaining agreements. We have a small number of apprentices who are indirect employees (<1 per cent). They are employed by a third party specialist apprenticeship and trainee provider, who support SYD with our apprenticeship program.

All employees are based in Australia and recruitment is managed by an internal Human Resources (HR) team. For specialist roles, external recruiters may be used. When this occurs, they are overseen by the HR team and bound by our Code of Conduct.





The relatively small size of our workforce means we outsource many activities to suppliers and consultants (see supply chain section).

## Our purpose and values

SYD’s purpose is to make Sydney proud every day. This reflects the positive impact we aspire to make in the community, with our customers, and for NSW and Australia more broadly.

To achieve this, we seek to work with our suppliers to manage sustainability risks and to meet safety, social, ethical and environmental standards.

SYD’s values guide and underpin the behaviours we must collectively demonstrate to realise our purpose. We expect our suppliers to share our values.

 <p><b>Always do the right thing</b> Integrity and honesty are at the heart of everything we say and do</p>	 <p><b>Have each other’s back</b> Working at SYD is a team effort. We care. We keep each other safe and well</p>	 <p><b>Do what you say</b> We challenge respectfully then collaborate to get to ‘yes’. We commit and deliver</p>	 <p><b>Think like our customers</b> We walk in their shoes and always strive to improve</p>
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1. For more detail, please refer to the latest annual reports and financial statements available on our [website](#)

# Supply chain

SYD has a diverse supply chain, predominantly consisting of services outsourced to deliver aspects of airport operations to suppliers located in Australia.

During 2021, SYD spent approximately \$350m procuring goods and services from more than 690 suppliers. Of these, 17 suppliers represent 70 per cent our spend.

## What we source

SYD directly procures services, goods for resale and goods not for resale.



**Services** include labour resources to support baggage services, construction services, grounds maintenance, car park operations, cleaning services, security and kerbside management, IT services and IT and payroll services



**Goods not for resale** include Personal Protective Equipment (PPE), uniforms and branded promotional items



**Goods for resale** include items in the SYD Lifestyle range such as t-shirts, caps, tote bags and chocolate

## Where we source from

The vast majority of our expenditure is with suppliers primarily located in Australia, followed by the Philippines and India.

Country	Example of product/service sourced
Australia	Labour resources to support baggage services, construction services, cleaning services, grounds maintenance, security and kerbside management, products in the SYD Lifestyle range
Philippines	Payroll processing services
India	IT support services
China	Products in SYD Lifestyle range, PPE

## Policies and governance

**SYD will not tolerate human rights abuse in our business and supply chain. We are committed to creating a culture in which our people respect the dignity and rights of all people.**

SYD's approach to addressing modern slavery is guided by the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

The Safety, Sustainability and Security (SSS) SAL Board sub-committee oversaw SYD's modern slavery risk management framework in our operations and supply chain in 2021.

Policies, procedures and standards are in place to assist SYD to uphold and protect human rights. These policies apply to directors, employees, contractors, and consultants. They also guide engagement with our suppliers.

### SYD policies

#### Code of Conduct

The Code of Conduct sets the standard for how we work together to operate the airport in a safe, responsible and secure manner. It reinforces SYD's commitment to respect and uphold human rights and reject all forms of slavery.

Employees of SYD receive training in relation to their obligations under the Code of Conduct. This includes mandatory induction (online and face to face) and an annual declaration of compliance with the Code.

#### Fraud and Corruption Control Policy

The Fraud and Corruption Control Policy outlines our commitment to high standards of ethical conduct and to supporting a culture of ethical behaviour. SYD has no tolerance for fraud, bribery or corruption in any part of our business.

#### Human Rights Policy

The Human Rights Policy details our commitment to respect and support human rights, including by rejecting any form of slavery such as forced and child labour. This policy guides our engagement with our suppliers in respect of their human rights practices.

#### Risk Management Policy

The Risk Management Policy identifies roles and responsibilities for risk management and the steps followed to identify, analyse, accept or mitigate risk.

#### Compliance Management Policy

The Compliance Management Policy details our commitment to a strong culture of compliance and ethical behaviour.

#### Sustainability Policy

The Sustainability Policy sets our commitment to responsible growth that delivers positive outcomes for our stakeholders, and to respect human rights.

#### Supplier Code of Conduct

SYD's Supplier Code of Conduct details the guiding principles and expectations in relation to the behaviour and business practices of our suppliers, including respect for human rights and rejection of modern slavery.

Suppliers are required to review and comply with the Supplier Code of Conduct and ensure that parties who form a part of their supply chain, including sub-contractors, understand and are familiar with its requirements.

SYD's procurement decisions are informed by a supplier's ability to meet or exceed the requirements of the Supplier Code of Conduct.

#### Whistleblower Policy

The Whistleblower Policy and associated program allows employees, contractors and suppliers to raise human rights and modern slavery concerns in a confidential manner. Directors and senior management receive training on the process for handling whistleblower complaints they may receive directly.

# Risk identification and management

## SYD's Enterprise Risk Management Framework and Risk Management Policy guide the approach to modern slavery risk management across our operations and supply chain.

SYD senior management assists the Sydney Airport Limited Board to manage risk by monitoring key aspects of the framework, including policies, delegation of required approvals, risk reporting, and due diligence.

In undertaking the category risk assessment of our suppliers, country and sector-specific risks were considered by external advisers. Data from the International Labour Organisation (ILO), UNICEF and the Global Slavery Index was used to determine the modern slavery risk associated with countries within SYD's supply chain. Similarly, industry risks relevant to SYD's supply chain were assessed at a sector level using global indices and reports from organisations such as the UN Principles for Responsible Investment and the Minderoo Foundation.

### 2021 risk review findings

In 2021, we continued to assess modern slavery risk in our operations and supply chain. In our operations, we reviewed and updated our modern slavery risks, identifying and implementing improvements to a number of key controls.

We also continued to review and assess risk in our supply chain. Our 2021 modern slavery program of work focused on engaging with the 17 suppliers that represent 70 per cent of our procurement spend, plus 17 suppliers identified through our analysis as having operations or supply chains with high-risk of modern slavery.

We assess suppliers' modern slavery risk management in two ways: either via the human and labour rights section of SYD's sustainable supply chain questionnaire; or via the new third-party platform which identifies and assesses modern slavery risks in these suppliers.

Through these reviews, SYD did not identify any instances of modern slavery associated directly with its operations or through sourcing-related risk assessments in relation to SYD's supply chain.

### Modern slavery potential risk areas

SYD has identified the following modern slavery risk areas in its operations and supply chains applying the framework set out in the UN Guiding Principles on Business and Human Rights. This framework guides the definition of a company's relevant human rights impacts and how the company is expected to address them. Priority actions to manage risks associated with these categories have been identified and assigned to cross-functional stakeholders for ongoing implementation.

#### In SYD operations

There is a risk SYD causes or contributes to modern slavery through its operations. The highest risk in our operations is potential for exploitation of SYD's employees. SYD has assessed the residual risk of this occurring in its operations as low. Almost all SYD employees are employed in permanent roles (96 per cent) and are engaged by either a direct contract or under collective bargaining. Where SYD employs people indirectly, we work with labour providers to identify and understand the risk controls they have in place and how these are applied to workers at Sydney Airport. Controls in place presently include having clear contracts in place for labour providers, along with provider audits as required.

There is also a risk that Sydney Airport is used by criminals to facilitate human trafficking or forced marriage. SYD works closely with the Australian Federal Police and Border Force on many operational matters at Sydney Airport, including supporting their work to stop criminal activities such as human trafficking.

#### In SYD supply chains

There is a risk SYD could contribute or be directly linked to cases of modern slavery in the following categories in our supply chain. We have identified risk exists in the following categories:

##### Contractor risk

A number of services outsourced by SYD present a heightened risk of modern slavery. These include risk of debt bondage or forced labour in labour-intensive, base skill activities such as cleaning, security, kerbside management. Risk of debt bondage, forced labour and child labour also exists through the use of offshore vendors to deliver IT services and payroll activities.

##### Goods for resale

A SYD Lifestyle range was introduced in 2019. The limited, low volume range includes chocolate and a t-shirt (manufactured in Australia), slides, a cap, a tote bag, and a branded reusable water bottle (manufactured in China). All products are produced by third party suppliers and are sold online and through selected airport retailers. Modern slavery risks associated with these products include child labour, forced labour and debt bondage.

##### Goods not for resale

The level of risk for goods purchased not for resale, including PPE, uniforms and promotional items and IT equipment, is largely influenced by the conditions of employment where these products are manufactured, and the materials used. Modern slavery risks associated with these products include child labour, forced labour and debt bondage.

While we have not yet completed detailed mapping beyond high risk and high spend suppliers, we acknowledge there is potential for modern slavery risk to be present beyond these suppliers.

# Management systems and controls

A number of management systems and controls are in place to mitigate modern slavery risk in SYD's operations and supply chain.

## Cross-functional working group

SYD's Modern Slavery Working Group was established in 2018 to oversee SYD's management of modern slavery risk. This group includes representatives from SYD's Procurement, Legal, Risk, Sustainability, Human Resources and Corporate Governance teams. The group meets and monitors the implementation of activities identified in SYD's modern slavery roadmap. Members of this group also lead the consultation undertaken with the reporting entities covered by this statement.

## Enterprise Risk Management Framework

SYD's Enterprise Risk Management Framework and Risk Management Policy guide our approach to risk management in relation to modern slavery. This framework addresses risk management in the areas of sustainability, human rights, modern slavery and ethics.

## Sustainable Supply Chain Management Framework

Informed by SYD's Human Rights, Sustainability and Safety policies, the Sustainable Supply Chain Management Framework includes the Supplier Code of Conduct, the Sustainable Supply Chain Management questionnaire and Supplier Improvement Plans. SYD continues to monitor and engage with our suppliers to understand how they are managing their modern slavery risks. SYD remains focused on enhancing its systems and processes to deepen its understanding and relationships with suppliers.

## Supplier Code of Conduct

SYD first introduced its Supplier Code of Conduct in 2017 and updated this in 2020. It includes specific expectations for suppliers to respect human rights and reject modern slavery, and encourages suppliers to raise human rights or modern slavery related concerns using SYD's anonymous whistleblower hotline HALO. It is available via the supplier portal on our website and provided to suppliers.

## Sustainable Supplier Survey

SYD's Sustainable Supplier Survey is a supplier assessment tool covering environmental, social and governance aspects of supplier performance. This tool is used to assess compliance with the Supplier Code of Conduct, including modern slavery.

## Supplier due diligence

SYD introduced a third-party platform in 2021 to assess modern slavery risks in our supply chain. This assesses modern slavery risk for suppliers, which is then used by the Procurement team and Contract Managers to further engage with suppliers and determine a course of action.

## Biennial supplier review and Supplier Improvement Plans

Alignment with the Supplier Code of Conduct is reviewed every two years. Where gaps are identified, SYD's Procurement team works with suppliers to develop Supplier Improvement Plans that address concerns.

## Contract clauses

SYD's precedent contracts used for procurement in key risk areas include anti-modern slavery provisions. These include requirements for a contractor to:

- warrant that it will not and does not engage in activities that constitute or involve modern slavery
- report to SYD if modern slavery is identified in its operations or supply chain, and take action to address identified issues
- provide training and education for its workforce to promote understanding of modern slavery risk

Failure to address identified modern slavery concerns may result in termination of a contract.

Where modern slavery is not explicitly addressed in a contract precedent, there is an express requirement in all SYD's precedent procurement agreements for the counterparty to comply with SYD's Supplier Code of Conduct, which requires suppliers to ensure they carry out their business practices free from modern slavery.

A number of material services contracts covering high risk supplier categories include clauses which do not allow sub-contracting without permission. As contracts in high-risk supplier categories are renewed or varied, these will be updated to include these clauses.

## Internal audit

In the past two years, SYD's internal audit focus has included fraud and corruption risk and supplier management. Any concerns arising from these audits have been reported to the SAL Board Audit and Risk Committee with remedial actions implemented.



# Management systems and controls

## Modern Slavery Response Procedure

In 2021, we worked with subject matter experts to develop a SYD Modern Slavery Response Procedure. This document explains the procedure SYD will follow if modern slavery is suspected or identified in our operations, supply chain or value chain.

The procedure explains what modern slavery is, including red flags and relevant examples to help identify it, SYD's guiding principles for responding to modern slavery, and the procedure for responding to suspected modern slavery, which includes four key steps:

1. Identification, triage, escalation and initial assessment
2. Investigation
3. Remediation
4. Review

In 2022, we will hold training sessions for our Modern Slavery Working Group members and SYD's authorised whistleblower recipients.

## Whistleblower reporting process

People wishing to raise a concern about modern slavery related to SYD or at Sydney Airport can do so via Sydney Airport's whistleblower hotline HALO, which is accessible 24/7. They can also make reports to authorised people within the business including the General Counsel, members of the Executive Leadership Team or the General Manager of Human Resources, who is also the Whistleblower Protection Officer. Reports can be made anonymously, and people who report concerns will be supported and protected from reprisal or detriment.

In 2021, SYD reviewed its internal process documents that guide our management of whistleblower reports to specifically address the management of modern slavery reports. These updates will be rolled out in 2022.

## Supplier grievance mechanisms

SYD's Supplier Code of Conduct includes information for suppliers on how to anonymously report concerns regarding suspected illegal, unethical or improper conduct via SYD's confidential and anonymous whistleblower hotline. Information reported through this channel is investigated in line with SYD's Whistleblower Policy.

## SYD access cards

An access card is required for any person working at the airport requiring access to the terminals or airfield. A key element of this process is confirming a person's identity and their right to work in Australia.

## SYD-issued access cards

Any person working at the airport is required to confirm their identity with evidence in person at the SYD ID and Access Services Centre to obtain an access card relevant to the nature of their work at the airport or for SYD.

As a part of the application process, documents are checked by SYD's team using the Australia Government's Visa Entitlement Verification Online system (VEVO). This confirms the applicant's right to work in Australia. Applications are also reviewed and approved by the Department of Home Affairs.

Identity check processes for SYD-issued access cards were strengthened in 2019. Where an applicant for all levels of access has lived overseas for more than six months in the past five years, they are required to supply a police check from the country where they resided, in addition to Government requirements.

Proof of identity documents required for Landside Terminal Cards were updated in 2019 to align to those for the Aviation Security Identification Card (ASIC).

## Third-party issued access cards

At the airport, ASICs can also be issued by Qantas, Virgin and a number of third-party providers following approval by the Department of Home Affairs. In this process, SYD's ID and Access Services Centre team reconfirm the applicant's identity prior to issuing an access control card for the airport.

## Airport Operators Licence

Many activities taking place onsite at the airport are undertaken by airlines and other companies, and fall outside of SYD's operational control. Companies undertaking these activities include ground handling agents, aircraft refuelling companies, cargo terminal operators, catering and cabin cleaning companies and aircraft maintenance providers, amongst others.

The conditions of our Airport Operators Licence (AOL) strengthen our oversight of these activities. Modern slavery licence conditions require licence holders to notify SYD of:

- modern slavery incidents in their operations and planned remediation actions
- any slavery or human trafficking enforcement proceedings occurring two years prior to the licence commencement date, and/or
- any actual, ongoing or potential enforcement actions that arise during the term of the AOL

During 2021, no reports of modern slavery were received from AOL holders.

# Effectiveness and consultation

## Assessing the effectiveness of SYD's actions

SYD's risk management framework is used to assess the effectiveness of its modern slavery management systems and controls.

Where modern slavery risks have been identified, a risk assessment is undertaken which includes the identification of existing controls, rating the effectiveness of these controls and identifying any additional actions to be undertaken to improve control effectiveness.

SYD is not aware of any instances of modern slavery in its operations or supply chain. No whistleblower reports received in 2021 related to human rights or modern slavery.

During 2021, we improved our modern slavery risk management by strengthening a number of key controls. These include:

- developing and introducing SYD modern slavery awareness training, which explains what modern slavery is, SYD's high modern slavery risks and what to do if someone suspects modern slavery to be occurring at Sydney Airport or in our supply chain
- developing a Modern Slavery Response Procedure, outlining the steps to respond to instances of modern slavery in our operations, supply chain or at Sydney Airport
- updating SYD's Whistleblower triage and response guidance for potential whistleblower reports related to modern slavery

The new procedure and triage guidance will be rolled out in 2022.

A number of opportunities have been identified to strengthen our modern slavery controls in 2022. These include:

- adding modern slavery awareness training to SYD's mandatory induction training package for new starters
- conducting training for SYD's whistleblower response team and Modern Slavery Working Group in new Modern Slavery Response Procedure
- further embedding supply chain due diligence in procurement practices
- working with SYD tenants and the broader airport community to raise awareness of modern slavery
- working to increase the number of suppliers assessed for modern slavery risk

## Performance indicators

SYD measures the effectiveness of its modern slavery risk management using a number of performance indicators listed below.

Indicators	2021
Percentage of precedent contracts with modern slavery clauses included <sup>1</sup>	100%
Completion rates for modern slavery awareness training	97%
Number of suppliers completing modern slavery questionnaire <sup>2</sup>	18
Number of modern slavery cases remediated	0

We are targeting 100 per cent completion rates for modern slavery awareness training, and working to continue to grow the number of suppliers completing the modern slavery questionnaire.

## Consultation with reporting entities

SYD is committed to developing and maintaining a group-wide response to modern slavery.

Consultation was undertaken in respect of each of the reporting entities covered by this statement. This process was led by the cross-functional working group established to oversee SYD's response to modern slavery.

Sydney Airport Corporation Limited (SACL) is the operator company of Sydney (Kingsford Smith) Airport and holds all employee and supply chain relationships for SYD. Therefore, the issues discussed in this statement apply for the main part, solely to SACL.

During the reporting period, TTCSAL was a wholly owned subsidiary of Perpetual Limited (Perpetual). Perpetual has reviewed TTCSAL's Modern Slavery Statement and is confident that they have strong processes for assessing and addressing their modern slavery risks.

The Perpetual modern slavery working group is implementing its modern slavery risk controls, and more information about this can be found in Perpetual's modern slavery statement, available on its website.

This statement has been prepared in consultation with the key teams that work together to drive responsible procurement for SYD, including members of the Procurement, Legal, Risk, Sustainability and Corporate Governance teams. It has been reviewed by our CEO and reviewed and endorsed by the Directors of the entities it covers.

1. Coverage via a modern slavery clause or via the requirement for compliance with SYD's Code of Conduct which includes preventing and addressing modern slavery

2. Relevant SYD Sustainable Supply Chain Survey questions or via Sedex

# Training, awareness and stakeholder engagement

## Training and building awareness

In 2021, SYD developed and rolled out a new online modern slavery awareness module. It is designed to build understanding of modern slavery, the factors that drive it and the part everyone at SYD can play to eradicate modern slavery from global supply chains.

This initial program targets people in high-risk roles. From 2022 onwards, this will be included in the onboarding training package for all SYD people and made available to all SYD employees via our Learn@SYD platform.

During the year, briefing sessions to raise awareness of modern slavery were held with teams working with sectors with high-risk of modern slavery including human resources, technology and procurement teams at SYD.

Information about modern slavery was also included in new training for Terminal Operations and Ramp teams of AOL holders, raising awareness of the issue and the role people working at the airport can play to mitigate these risks.

SYD's Mini Sourcing Guide was updated and released in 2021 including information about modern slavery risks and links to more detailed information about managing risks in sourcing decisions. This was complemented with face to face workshops held prior to the NSW COVID lockdown, which will be continued this year.

Briefing sessions for contract owners were also held on the new third-party risk assessment platform introduced at SYD during the year.

## Collaboration

SYD has participated in a number of multi-stakeholder forums and collaborations on human rights and modern slavery.

### UN Global Compact and Global Compact Network Australia

SYD is a signatory to the UN Global Compact and a Member of the Global Compact Network Australia (GCNA) and participates in its Modern Slavery Community of Practice. SYD is committed to upholding the principles of the UN Global Compact.

### Australian Federal Police

In 2019, SYD partnered with the Australian Federal Police and Anti-Slavery Australia to develop a forced marriage awareness campaign. Posters were placed in key locations across the three airport terminals at Sydney Airport and communicated the ways to seek assistance for anyone at risk of forced marriage.

In 2021, SYD supported the re-launch of the AFP's Airport Watch program. This program highlights the important role airport workers can play in identifying people at risk of modern slavery and human trafficking as they pass through the terminals.

### Airports Council International

SYD is a member of the Airports Council International (ACI), which resolved in September 2016 to support the fight against human trafficking. SYD CEO, Geoff Culbert, sits on the ACI World Governing Board and Asia Pacific Regional Board.

## Stakeholder engagement

During 2021, SYD continued to engage with stakeholders across the airport on the issue of modern slavery.

### SYD suppliers

Following the release of the updated Supplier Code of Conduct, meetings were held with key suppliers to discuss modern slavery risks and SYD's expectations.

### SYD staff and community

The AFP's Airport Watch program, supported by SYD, provided information to the airport community on modern slavery and highlighted the important role airport workers can play in identifying people at risk of modern slavery and human trafficking as they pass through the terminals.

### SYD tenants

We met with a number of Sydney Airport retailers during 2021 to discuss modern slavery risk and how we can work together to mitigate these risks.

## Compliance with mandatory reporting criteria

Mandatory criteria	Reference in this statement
1. Identify the reporting entity	Inside cover
2. Describe the reporting entity's structure, operations, and supply chains	Inside cover, pages 2-3
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 5
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Pages 6-7
5. Describe how the reporting entity assesses the effectiveness of these actions	Page 8
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 8
7. Provide any other relevant information	Page 9