

MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR ENDING DECEMBER 2021

SWISSPORT ANZ PTY LTD ACN 167 311 551



INTRODUCTION

As a global leader of ground services and cargo handling for the aviation industry, Swissport is committed to ensuring there is transparency in our business and in our approach to addressing modern slavery throughout our supply chains.

Every Swissport employee in Australia is guided by and required to comply with Swissport's Code of Conduct which contains a number of key principles including the recognition of human rights, behaving with integrity, respect for other cultures and acting responsibly within our communities and towards society at large.

This statement, which is intended to meet the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**), describes the steps taken by Swissport ANZ Pty Ltd ACN 167 311 551 and its Australian controlled entities, being:

- (a) Prime Vantage Pty Ltd ACN 151 250 127;
- (b) Australian Ground Services Pty Ltd ACN 052 961 752;
- (c) AGS Logistics Pty Ltd ACN 080 210 180;
- (d) Swissport Pty Ltd ACN 151 147 303;
- (e) Swissport Australia Pty Ltd ACN 103 196 701 as trustee for the Swissport Australia Unit Trust;
- (f) Carbridge Pty Ltd ACN 050 099 342; and
- (g) Aspire Lounges Australia Pty Ltd ACN 627 491 070,

(**Swissport Australia, we, us, our**) during the financial year ending 31 December 2021 to seek to minimise the risk of modern slavery occurring in our business and supply chains.

BUSINESS OVERVIEW

OUR STRUCTURE AND OPERATIONS

The Swissport Group is the global leader of ground services and cargo handling for the aviation industry. Swissport Australia is part of the Swissport Group whose operating parent company is Swissport International AG, based in Zurich, Switzerland. The ultimate holding company of the Swissport Group is Radar Topco S.A.R.L.

The Swissport Group has over 48,000 employees worldwide and operates in 45 countries. Further information about the Swissport Group is available [here](#).

Swissport Australia operates at 21 airports in Australia, partnering with all major domestic airlines and many international carriers.

Swissport Australia (including its predecessor entities) has for more than 20 years been proudly contributing to Australia's regional, state and national economies through our business. Swissport Australia generates the majority of its revenue by providing airport ground services, which include:

Passenger services, including:

- (a) check-in and gate;
- (b) passenger mobility;
- (c) lounge hospitality;
- (d) executive aviation; and
- (f) lost and found;

Ramp services, including:

- (a) baggage services;
- (b) de-icing;

- (c) moving of aircraft; and
- (d) aircraft cleaning; and

Transport Services, including:

- (a) bussing services within the airport and to/from the airport and metropolitan areas; and
- (b) baggage trolley services within the airport.

OUR SUPPLY CHAIN

Our supply chain primarily comprises the purchase of products and services needed for our day-to-day operations including:

- (a) In relation to the airport ground services we provide:
 - (i) corporate uniforms;
 - (ii) ground service equipment;
 - (iii) ground service equipment maintenance services;
 - (iv) bussing vehicles;
 - (v) bus maintenance services;
 - (vi) baggage trolleys; and
 - (vii) cleaning services.

- (b) In relation to administration/business support services:
 - (i) information technology and communications;
 - (ii) property services (including facilities management, utilities, cleaning and waste management);
 - (iii) consulting services;
 - (iv) marketing services;
 - (v) print and promotional goods; and
 - (vi) office supplies.

MODERN SLAVERY RISK ASSESSMENT AND MANAGEMENT

The Swissport Group is committed to eliminating all forms of modern slavery (including slavery-like practices, servitude and forced or compulsory labour and human trafficking). The Swissport Group has been a participant in the [United Nations Global Compact](#) since 2011 and is committed to upholding the elimination of all forms of forced and compulsory labour (Principle 4) and to upholding the effective abolition of child labour (Principle 5). The Swissport Group's [2020 Sustainability Report](#) sets out the Swissport Group's commitment to the United Nations Global Compact.

As part of the Swissport Group, Swissport Australia is also aligned to the group-wide [Code of Conduct](#) (**Code of Conduct**). The Code of Conduct is based on a number of key principles, including:

- (a) behaving with integrity and in compliance with the law;
- (b) the recognition of internationally proclaimed human rights;
- (c) respect for other cultures and opinions; and
- (d) acting responsibly towards society.

The Code of Conduct is an integral part of Swissport Australia's corporate governance. The Code of Conduct applies to the Board of Directors and all employees (including contractors). Individuals are personally obliged to abide by the Code of Conduct and its supplementing internal regulations and directives.

It is the responsibility of Swissport Australia's training department to ensure that the Code of Conduct is included in all staff training.

We consider the risk of modern slavery within our direct business operations in Australia to be low. However, we recognise that through our supply chains, we can be indirectly exposed to the risk of modern slavery.

The most significant risks associated with our supply chain are indirect and fall into the following two key areas:

- (a) The potential supply risk of purchasing clothing and uniforms from suppliers involved in modern slavery with such practices as forced or compulsory labour and/or low wages, penalties and excessive working hours associated with the manufacturing of those products.
- (b) The potential supply risk of purchasing ground service equipment, bussing vehicles and baggage trolleys from suppliers involved in modern slavery with such practices as forced or compulsory labour and/or low wages, penalties and excessive working hours associated with the manufacturing of the equipment.

Our approach to preventing and mitigating the risk of modern slavery in these areas includes:

- (a) initial supplier due diligence and ongoing adherence to Swissport values (via contractual means where possible);
- (b) framework of policies and procedures including Swissport anti-bribery and anti-corruption policies;
- (c) providing employee training at the commencement of employment and regular updating of training;
- (d) internal grievance resolution procedures and guidelines which employees can access;
- (e) Speak Up Hotline and whistle-blower policies. The Speak Up Hotline enables employees, and employees are encouraged, to report matters, including breaches of law and violation of human rights, via phone or email with the option of remaining anonymous. The rights of those who report such matters in good faith are protected in accordance with law;
- (f) establishment and promotion of adequate reporting and monitoring mechanisms; and
- (g) investigation and analysis of complaints and grievances received through the above mechanisms. Once issues are investigated, we take appropriate steps to address matters once substantiated.

SUPPLIER CONDUCT

As part of the Swissport Group, Swissport Australia is also aligned to the group wide [Supplier Code of Conduct](#) (**Supplier Code of Conduct**). The Supplier Code of Conduct is based on a number of key principles, including:

- (a) avoidance of child labour;
- (b) rejection of any bribery or corrupt behaviour;
- (c) environmental management;
- (d) freedom of association;
- (e) freely chosen employment;
- (f) health & safety;
- (g) human rights;
- (h) non-discrimination; and
- (i) fair working conditions.

All Swissport Australia suppliers are expected to comply with the Supplier Code of Conduct. Where possible, we ensure that supplier agreements include a condition that suppliers will comply with our Supplier Code of Conduct, including the prioritisation of human rights such as non-discrimination and the rejection of child labour and forced and compulsory labour. Any non-compliance with the obligations under the Code of Conduct would provide Swissport Australia with a right to terminate the applicable supply contract.

Within our supplier contracts, we have also identified the importance of ensuring an audit right on supplier operations to monitor compliance with our Supplier Code of Conduct and other applicable laws.

TRAINING

To raise awareness of modern slavery and human trafficking, we have brought the contents of the United Nations Global Compact, the Code of Conduct and the Supplier Code of Conduct to the attention of all employees by publishing it on the Swissport Group internal portal.

We also ensure that all new employees receive training on the Code of Conduct.

REPORTING AND MONITORING MECHANISMS

Swissport Group employees are encouraged to report breaches of Swissport's Code of Conduct and/or any concerns of illegal or unethical conduct to their line manager or HR department. Alternatively, they may report allegations via the Speak Up Hotline, a service hosted on behalf of the Swissport Group by an independent third party. Reports may be made to the Speak Up Hotline via phone or secure website and may be made anonymously.

Reports are triaged by the Swissport Group's legal department and any allegations of breach, including suspicions of modern slavery practices, will be investigated and then referred to the relevant authorities, where applicable.

IMPACTS OF COVID-19 PANDEMIC

The COVID-19 pandemic has had a significant impact on Swissport Australia with the closure of international and domestic borders in Australia. Travel interstate and across the Trans-Tasman travel bubble continued to open and close within the reporting period, with Swissport Australia's operations severely reduced for a considerable amount of time. Additionally, labour and supply chain issues were also compounded.

In FY21, operations increased and we were able to continue with efforts to assess and address modern slavery management through due diligence on suppliers, employee training (including online training where appropriate), internal grievance resolution procedures, employee guidelines, the speak up hotline and investigations of any incoming modern slavery complaints.

Swissport Australia has continued to communicate and maintain established supplier relationships by avoiding the variation of supplier contracts and ensuring supplier contracts remained active during the COVID-19 pandemic where possible.

Swissport Australia recognises the impact COVID-19 has had on employees and the new modern slavery risks created by the COVID-19 pandemic. In response to the pandemic, health and safety has been a priority, and for example, we have ensured all workers are protected by providing appropriate sanitation facilities and stations as well as ensuring procurement of personal protective equipment through appropriate supply chains.

Swissport Australia recognises COVID-19 may have increased modern slavery risks in our operations and supply chains. To address and better understand these risks along with the effectiveness of our actions to address these risks, we have consulted with industry networks and stakeholder groups.

All of Swissport Australia's subsidiaries were consulted when addressing the impact of COVID-19 on the Modern Slavery Statement. We have briefed and engaged with all directors of the controlled subsidiaries in order to maintain modern slavery risk management during the COVID-19 pandemic.

ASSESSING OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY

To ensure that modern slavery is not taking place in any part of our business or supply chains, we recognise the need to use various monitoring metrics which are summarised in the following table:

Action	Metric
Supplier conduct	Number of suppliers on which thorough due diligence is undertaken prior to engagement by Swissport Australia. Number of supplier contracts with a contractual obligation to adhere to the Supplier Code of Conduct.
Training	Number of people within our business who receive training via Code of Conduct training.
Reporting and monitoring mechanisms	Number of people who report issues concerning modern slavery, including via the Speak Up Hotline. Number of reported issues escalated to the board of Swissport Australia.

It is Swissport Australia's intention to more formally record and track these metrics to develop a deeper understanding of the effectiveness of our management of modern slavery risks in our business.

OVERSIGHT AND GOVERNANCE

Swissport ANZ Pty Ltd and its controlled entities are governed within the same management systems, frameworks, policies and procedures. In addition, each of the controlled entities' two directors sit on the board of Swissport ANZ Pty Ltd. On this basis, the modern slavery risks within the business are identified, assessed and addressed centrally and uniformly for each entity.

CONSULTATIONS WITH SWISSPORT GROUP AUSTRALIAN CONTROLLED ENTITIES

Swissport Australia and its Australian controlled entities are governed under the same management system, policies and procedures, with directors of each controlled entity sitting on the Swissport Australia board. Swissport Australia consulted and actively engaged all Australian controlled entities in the development of this joint Modern Slavery Statement.

Details of the Act and its reporting requirements were provided to all controlled entities, along with Swissport Australia's proposed actions to address the impacts of modern slavery in this statement.

LOOKING FORWARD

As a member of the global aviation business community, Swissport Australia acknowledges both its moral and legal obligations to ensure that human rights are upheld and the risks of modern slavery within its supply chains are mitigated to the greatest extent possible.

It is Swissport Australia's intention to further prioritise the assessment and monitoring of modern slavery risks in our supply chain and to further integrate these practices into our procurement framework going forward.

This statement has been approved by the Board of Directors of Swissport ANZ Pty Ltd ACN 167 311 551 and signed by Brad Moore as the Managing Director of Swissport ANZ Pty Ltd.



Brad Moore
Managing Director

30 June 2022