

SYD

Sydney Airport

Modern Slavery Statement CY 2024

About this report

This statement is a joint Modern Slavery Statement covering the activities undertaken during the year ending 31 December 2024 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 or Sydney Airport.

Sydney Airport Structure

This statement is prepared on behalf of Sydney Aviation Alliance Holdings Pty Ltd (SAAH), together with the entities it owns or controls, including the following reporting entities:

- Sydney Aviation Alliance Pty Ltd (SAA)
- Sydney Airport Limited (SAL)
- Southern Cross Airports Corporation Holdings Limited (SCACH)
- Sydney Airport Corporation Limited (SACL)



Contents

Chair and CEO message	1
Operations, structure and supply chain	2
Modern slavery program governance	4
Understanding and identifying risks	5
Actions to address and assess risk	7
Effectiveness of our actions and consultation	10
Partnerships and stakeholder engagement	11
Compliance with mandatory reporting criteria	13

Acknowledgement of Country

Sydney Airport acknowledges the Dharawal People of Coastal Sydney who are the Traditional Custodians of the lands, waterways and skyways where we work and live.

We pay our respects to them, Elders past and present, and to other Aboriginal and Torres Strait Islander peoples who have made this area their home.

We recognise the continuation of cultural, spiritual and educational practices of First Nations peoples throughout Australia.

A message from our Chair and CEO



David Gonski
Chair

Scott Charlton
Chief Executive Officer

As a leading global airport Sydney Airport plays a vital role in connecting Australia to the world through travel and trade. Respecting human rights is central to our core values of keeping each other safe and well and always doing the right thing.

In 2024, we welcomed 41.40 million passengers, supporting both the New South Wales and national economies. With this growth comes the responsibility to continually strengthen our commitment to ethical business practices, human rights, and education to combat modern slavery.

This Modern Slavery Statement outlines the steps we are taking to identify and mitigate modern slavery risks within our operations and supply chains. We recognise the potential risks within the aviation sector, including within our supply chains, service providers, and outsourced labour, and are committed to addressing them through risk assessments, supplier engagement, and continuous improvement.

Our key 2024 initiatives include:

New supply chain risk mapping

Modern slavery risk mapping of Sydney Airport's supply chain was completed in 2024 by external business and human rights advisory firm, Pillar Two. This risk mapping identified 10 key modern slavery risk areas in the airport's supply chains, which are outlined later in this statement. As part of our focus on continuous improvement, Sydney Airport will incorporate these risk areas into our procurement practices, strengthening our ability to mitigate potential modern slavery risks.

Airport-specific human trafficking awareness campaign

Sydney Airport partnered with Melbourne Airport, anti-human trafficking organisation A21, and the Australian Federal Police (AFP) to launch the "Can You See Me?" campaign. This was Australia's first joint airport led initiative against human trafficking. Throughout November, all digital screens in high-traffic areas in the terminals were activated to help educate the public on identifying and reporting modern slavery. There were QR codes on the screens linking to an airport-specific video highlighting key signs and indicators. With seven million passengers passing through both airports during the month-long campaign, this initiative significantly raised awareness and empowered travellers to take action. Key operational digital screens will continue to run the campaign at Sydney Airport throughout 2025. A21 also hosted a staff training workshop and supplied awareness posters which have been installed at various locations around Sydney Airport.

Precinct partner collaboration

With almost 33,000 workers across more than 800 organisations, Sydney Airport is often likened to a mini city, which means collaboration is essential to addressing modern slavery risks in our operations. In 2024, we continued to work closely with key partners to drive awareness and best practices, in particular our precinct cleaning contractor and security contractor. Sydney Airport's cleaning contractor reinforced transparency in risk mitigation through engagement with our Modern Slavery Working Group, while our security contractor committed to implementing airport-specific human trafficking training for all security screening staff from 2025. These efforts highlight our prioritisation of partnerships in strengthening vigilance and response capabilities across the airport precinct.

Sydney Airport remains committed to identifying, addressing, and mitigating modern slavery risks by continuously strengthening our processes to uphold human rights. We measure the effectiveness of our actions through supplier audits, grievance mechanisms, and ongoing stakeholder engagement.

This statement and its contents are formally acknowledged and approved by the Board of Sydney Aviation Alliance Holdings Pty Ltd in its capacity as principal governing body under section 14(2)(d)(ii) of the *Modern Slavery Act 2018* (Cth) and signed accordingly by:

David Gonski
Chair, Sydney Aviation Alliance Holdings Pty Ltd

Scott Charlton
Chief Executive Officer, Sydney Airport

SYD's operations, structure and supply chain

Operations

Sydney Airport (SYD) is Australia's largest domestic and international gateway, directly connecting Sydney to an extensive network of 100 destinations across the country and the world. Recognised as one of the nation's most critical infrastructure assets, it plays a central role in supporting Australia's transport network and global trade.

In 2024, 41.40 million passengers travelled through our domestic and international terminals, onboard 287,194 passenger aircraft while a further 12,235 freight aircraft passed through our airport.

The impact of our operations goes well beyond the airport precinct, with Deloitte Access Economics research showing that in 2023, SYD contributed \$39.8 billion in economic value and supported 314,600 full-time equivalent jobs, representing 1.5 per cent of Australia's GDP and 3.0 per cent of national employment.

SYD operations and revenue streams



SYD workforce

SYD directly employs 648 people, with the majority of our workforce in permanent full-time and part-time roles. Seventy per cent of employees are engaged on direct contracts, with the remaining 30 per cent on 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 supplier, who support SYD with our apprenticeship program.






Recruitment is managed by our internal Human Resources team and for specialist roles, external recruiters may be used.

SYD outsources activities to specialist suppliers and consultants through our sourcing process and contract management requirements.

Our purpose and values

SYD's purpose is to be a leading global airport connecting Australia and we work with our suppliers to align them with our sustainability requirements and meet safety, social, ethical and environmental standards.

Our values define the behaviours we must embody collectively to achieve our purpose. We expect our suppliers to share our values and communicate this through our Supplier Code of Conduct.

 <p>Keep each other safe & well</p> <p>We are all safety leaders. We act inclusively and treat people with respect.</p>	 <p>Always do the right thing</p> <p>We act with integrity. We collaborate and have courageous conversations.</p>	 <p>Do what you say</p> <p>We take accountability, commit with clarity and always deliver.</p>	 <p>Deliver for our passengers</p> <p>We provide an exceptional service and experience for our passengers.</p>	 <p>Focus on tomorrow & today</p> <p>We drive sustainable performance. We promote curiosity, challenge the status quo and continually innovate.</p>
---	---	--	--	---

Supply chain

In 2024, SYD worked with 955 suppliers, with the annual spend distributed between 54 per cent in Capital Expenditure (CAPEX) and 46 per cent in Operational Expenditure (OPEX).

SYD engages suppliers across a wide range of industries including security, technology support, consultancy, facilities management, construction and engineering, office supplies, cleaning and waste management. These suppliers deliver essential goods and services critical to the airport's overall operations.

The airport also oversees significant capital works projects, drawing on expertise and supply chains within Australia's construction sector. Suppliers are typically engaged as contractors, either on a long or short-term basis, depending on the nature of the services provided.

The vast majority of suppliers directly contracted by SYD are based in Australia and make up more than 98 per cent of the total spend for 2024.

Country	No. of suppliers	Percentage of total spend
Australia	882	98.07%
New Zealand	5	0.97%
United Kingdom	18	0.28%
United States	21	0.19%
Ireland	4	0.18%
Switzerland	4	0.06%
Singapore	3	0.04%
Isle Of Man	1	0.03%
Germany	4	0.03%
Estonia	1	0.03%
Netherlands	2	0.03%
Malaysia	1	0.03%
Denmark	2	0.02%
Thailand	1	0.01%
Romania	1	0.01%
France	1	<0.01%
Spain	1	<0.01%
Israel	1	<0.01%
Canada	1	<0.01%
Belgium	1	<0.01%
Total	955	100%

SYD is committed to operating ethically, fairly, and in compliance with all relevant laws while maintaining a socially responsible approach that aligns with the expectations of our local communities. We hold our suppliers to the same high standards of conduct throughout our supply chain.

Modern slavery program governance

SYD manages modern slavery risks in our operations and value chain through our Modern Slavery Working Group, a cross-functional team that meets quarterly to deliver an annual program of work.

This program is guided by:

- The UN Guiding Principles on Business and Human Rights (UNGPs)
- 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
- SYD's Human Rights Policy

Our Modern Slavery Working Group met quarterly in 2024 and continues to monitor regulatory and legislative trends and announcements, including the Australian Government's response to review of the Modern Slavery Act. Additionally, the group assesses the effectiveness of SYD's existing initiatives and explores best-practice approaches implemented by other organisations to strengthen our response to modern slavery risks.



Understanding and identifying modern slavery risks

SYD follows the UNGP on how risks may be present in operations and supply chain and whether we may cause, contribute or be directly linked to harm people:

- A company may cause modern slavery if its own acts or omissions directly result in the modern slavery occurring (for example, if it engaged children in hazardous work)
- A company may contribute to modern slavery if its own acts or omissions are significant in facilitating, encouraging or enabling another party to cause a situation of modern slavery (for example, if its purchasing practises put significant cost and time pressures on suppliers that they could only meet through the use of forced labour)
- A company may be directly linked to modern slavery by its operations, products or services through a business relationship (for example, if a product it purchases was manufactured using workers in debt bondage).

SYD's Enterprise Risk Management Framework and Risk Management Policy guide the approach to modern slavery risk management.

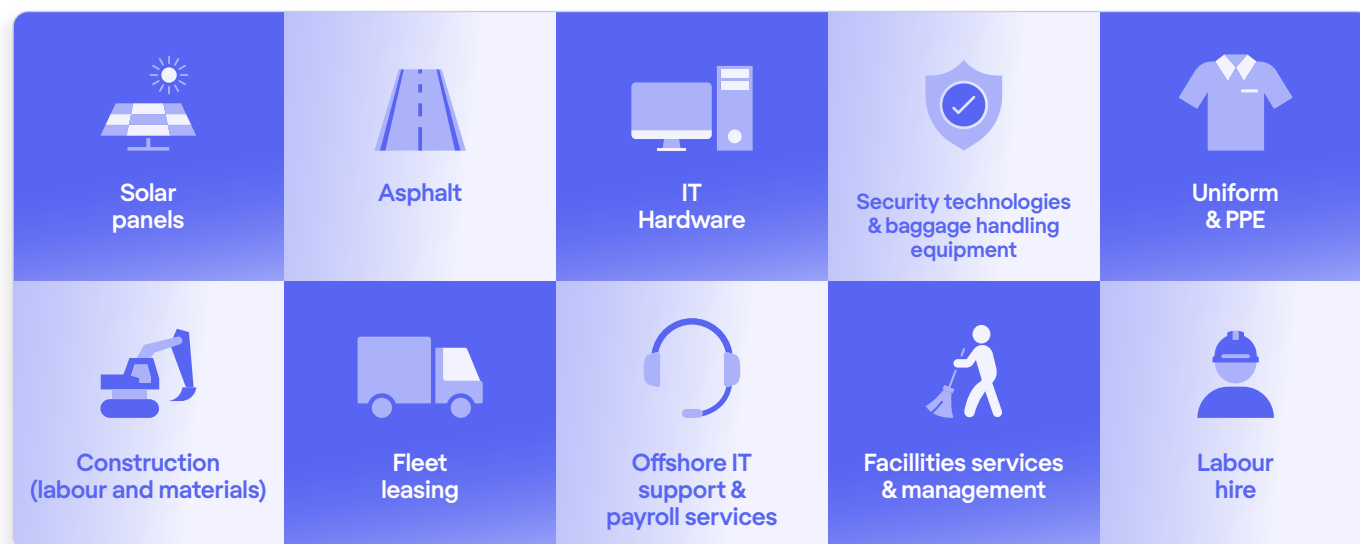
Supply chain risk mapping

There is a risk that SYD could contribute to or be directly linked to cases of modern slavery within our supply chain. To help strengthen our oversight, SYD engaged external business and human rights advisory firm, Pillar Two, in 2024 to conduct independent risk mapping to identify key areas of potential modern slavery risk.

Pillar Two's methodology is aligned with the UNGPs, the global standard for preventing and addressing the risk of adverse impacts on human rights, including the right to freedom from modern slavery. It assessed and prioritised risks based on the severity of risk to people (based on scale, scope and irremediability) rather than operational or financial risk, as well as likelihood. It also considered the potential involvement of Sydney Airport in each risk area (i.e. whether the airport may cause, contribute to or be directly linked to the risk).

The assessment was based on spend data, engagement with internal stakeholders, and research on modern slavery risk profiles of similar organisations. The methodology incorporated external resources such as the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, the Verité Forced Labor Commodity Atlas, and the Walk Free Global Slavery Index, among others.

This analysis identified 10 indicative modern slavery risk areas in SYD's supply chain:



The risks identified in this analysis underscore areas within SYD's supply chain where the most significant modern slavery and broader labour exploitation risks are likely to occur.

Taking account of these updated supply chain risk areas, SYD is better able to prioritise our efforts and strengthen our processes in 2025, maintaining our commitment to mitigate the risks of modern slavery. Key actions include enhancing mitigation efforts through measures such as expanding risk screening to additional areas identified, updating our supplier questionnaires, revising the Supplier Code of Conduct and updating staff training to reflect these changes.

Understanding and identifying modern slavery risks

Operations



Human trafficking

Human trafficking is a modern slavery risk within the airport environment, where vulnerable individuals may be exploited during transit. While the ABF under the Department of Home Affairs takes primary responsibility for mitigating this risk through the National Action Plan to Combat Modern Slavery 2020–25, SYD plays a supporting role.

In 2024, SYD joined forces with Melbourne Airport and initiated Australia's first airport-specific human trafficking awareness campaign with digital screens activated in key high traffic areas including check-in counters, gates and baggage carousels at SYD's domestic and international terminals.

In partnership with anti-human trafficking organisation, A21, and guidance and input from the AFP, the "Can You See Me?" campaign was rolled out for the month of November when close to seven million passengers passed through both Sydney Airport and Melbourne Airport.

This initiative aimed to educate people on how to recognise and report the signs of human trafficking with QR codes on the digital screens linking to additional resources and videos. SYD has continued to run the campaign screens across 288 operational screens in key high-traffic areas, including above check-in counters, into 2025.

More information on the campaign can be found [HERE](#).

SYD has also worked with our security contractor to require that, starting in 2025, all security screening staff complete airport-specific human trafficking training. The training will focus on how to recognise signs of exploitation and take appropriate action to protect potential victims of modern slavery. This will enhance the capability of security staff to identify vulnerable individuals, providing an additional layer of support alongside ABF officers at the T1 international terminal. For our T2 and T3 domestic terminals, where there are no ABF officers stationed, security staff will play a vital role in identifying and supporting potentially at-risk passengers.

Workforce

SYD acknowledges the potential risk of it causing or contributing to modern slavery through the exploitation of employees, though this risk is considered low. Over 90 per cent of SYD's employees hold permanent positions, engaged through direct contracts or collective bargaining agreements, providing clear oversight of their employment terms and conditions.

To mitigate risk within our workforce, we maintain a policy framework, accessible grievance mechanisms, and comprehensive training programs for our people.

For indirectly employed individuals, SYD collaborates with our contractors to assess and understand their risk controls. Current measures include communicating our sustainability and human rights expectations, establishing clear contractual agreements, conducting audits and promoting awareness of relevant complaint mechanisms, including the Whistleblower hotline.

Actions to address and assess modern slavery risk

Policy framework

SYD has established policies, procedures, and codes to uphold and protect human rights, outlining expectations for directors, employees, contractors, and consultants.

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 to 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 and an annual refresher training regarding key principles of the Code.
Supplier Code of Conduct	<p>The Supplier Code of Conduct establishes the minimum standards of behaviour and conduct expected of SYD's suppliers across seven elements including: Safety and Wellbeing, Labour Practices and Human Rights, Diversity and Inclusion, Governance and Compliance, Privacy and Cyber Security, Environmental Management, and Community.</p> <p>The code also encourages suppliers to raise human rights or modern slavery related concerns using SYD's anonymous whistleblower hotline. The code is publicly available via the website, through our supplier portal and provided to suppliers.</p>
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.
Whistleblower Policy	The Whistleblower Policy and associated program allows employees, contractors and suppliers to raise concerns about known or suspected unlawful, unethical or irresponsible behaviour, including 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.

Actions to address and assess modern slavery risk

Risk management and controls

A framework of management systems and controls is in place to address and assess modern slavery risk in SYD's operations and supply chain.

Contracts and modern slavery clauses

SYD is committed to addressing modern slavery risks across our operations and supply chain. To reinforce this commitment, contractual agreements with fuel suppliers, operators, tenants, other suppliers and new agreements with airlines include specific modern slavery clauses. These provisions establish clear obligations for our partners to assess and address modern slavery risks and comply with relevant laws, including the *Modern Slavery Act 2018* (Cth).

Airport operating licence

Many activities taking place onsite at the airport are undertaken by airlines and other companies that fall outside of SYD's direct operational control. These activities are performed by ground handling agents, aircraft refuelling companies, cargo terminal operators, catering and cabin cleaning companies, and aircraft maintenance providers, among others.

The Airport Operating Licence (AOL) establishes an enforceable framework of minimum standards for companies performing these activities at SYD. This framework aims to improve behaviour and enhance outcomes across five key areas: safety, security, environment, sustainability, and operational performance.

The AOL incorporates modern slavery obligations and licence holders must notify SYD of:

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

During 2024, there were no reports of modern slavery from AOL holders.

Aeronautical services agreements, jet fuel supplier agreements, and ITP operator agreements

SYD's agreements with airlines, jet fuel suppliers, and Into-Plane (ITP) operators include clauses requiring them, their associates, and affiliates to:

- comply with all applicable laws relating to modern slavery and human trafficking, including the *Modern Slavery Act 2018* (Cth)
- take appropriate action to assess and address the risks of modern slavery in their operations and supply chains
- represent and warrant that, to the best of their knowledge and after making reasonable enquiries, they have not been convicted of any offence involving slavery or human trafficking and are not subject to any related investigations, inquiries, or enforcement proceedings.

Additionally, jet fuel suppliers and ITP operators are required to notify SYD immediately if they become aware of any event or issue that may cause them to be in breach of anti-slavery laws.

By embedding modern slavery clauses across our contractual agreements, SYD reinforces its commitment to upholding ethical and responsible business practices within the aviation sector.

Whistleblower reporting process

People wishing to raise a concern about modern slavery related to SYD or at Sydney Airport can do so via our whistleblower hotline, which is accessible 24/7.

They can also make reports to authorised people within the business including Directors, the Group Executive - Government Relations, Sustainability & Legal, the Group Executive - People & Corporate Affairs (who is also the Whistleblower Protection Officer) and members of the Executive Leadership team.

Reports can be made anonymously, and people who report concerns will be supported and protected from reprisal or detriment.

During the reporting period SYD received five reports and these were investigated by SYD's whistleblower team, with appropriate action taken in some cases to rectify issues identified. None of these reports related to potential or actual instances of modern slavery.

In 2024, the Modern Slavery Working Group led an initiative to create a new SYD Whistleblower poster, which has been shared with airport stakeholders to raise awareness so that all workers across the precinct have access to this anonymous service if they suspect wrongdoing.

Modern slavery response procedure

Our Modern Slavery Response Procedure 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, and the key indicators of modern slavery. SYD's guiding principles for responding to modern slavery, and the procedure for responding to suspected modern slavery, includes four key steps:

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

Internal audit

In 2024, SYD maintained a risk-based approach to internal audits, ensuring that any indicators or risks of modern slavery were investigated. No such risks emerged in the audits conducted this year.

The internal audit team has continued to implement remedial actions following the 2023 internal audit of post-procurement contract administration, which assessed processes and controls for managing large operating expenditure contracts. The audit reviewed supplier performance management, accuracy of charges, use of rebates, and contract variations.

While no modern slavery concerns were identified, further improvements were introduced in 2024 to strengthen overall contract oversight. These included retraining management on contract management discipline and processes, implementing stronger KPIs for key

contracts, ensuring invoices provide clearer supporting details for validation, and mandating contract management plans for all agreements. Additionally, proactive measures were taken to review contracts before expiry and enhance contract management training across relevant teams.

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 Aviation Security Identification Cards (ASICs)

Airport workers are required to confirm their identity with evidence in person at the Sydney Airport Service 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, government-issued photo identification is required, and documents are checked by SYD's team using the Australian Government's Visa Entitlement Verification Online system. 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 standard Australian Government requirements.

– Landside terminal access cards

These are for anyone working at the airport that does not require access to restricted areas (i.e. airside beyond security check-point) and require government-issued photo identification.

– Third party issued access cards

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

Training

In November, 109 SYD staff participated in a training session led by A21, focusing on airport-specific signs of modern slavery, particularly human trafficking. The session provided practical guidance on escalation, referrals, and reporting procedures at SYD and beyond, aligning with the public awareness campaign running across the terminals.

A21 also conducted an in-depth training session for the Modern Slavery Working Group in Q3, emphasising a multi-dimensional approach — prevention, protection, prosecution, and partnership — while sharing survivor stories to highlight real-world impacts.

To enhance on-site awareness, the Modern Slavery Working Group collaborated with A21 to develop an airport-specific signs and indicators poster, which was placed inside staff bathroom stalls.

Additionally, SYD rolled out updated online training for contract managers, covering modern slavery risks, red flags, real-world examples, guiding principles for response, and internal procedures for handling suspected cases. Between the launch on the new training in May and the end of December, 43 employees completed the module.

Supplier due diligence and risk review findings

SYD continued to engage the services of an external modern slavery risk assessor in 2024 to specifically address modern slavery risks in our supply chain. Suppliers were chosen for further assessment using the procurement department's ESG assessment methodology, which covers the full year spend, excluding non-addressable suppliers such as regulatory fees, licenses, and statutory payments, with remaining addressable suppliers evaluated for environmental impact, modern slavery and human rights risks, and governance controls. SYD identified 103 suppliers for further assessment. This third-party review supplements our Sustainable Supplier Survey by evaluating supplier documentation, policies, and procedures.

As part of this assessment, nine of the 103 suppliers self-identified to the external assessor due to potential modern slavery risks related to the nature of the services they provide. To gain a clearer understanding of these risks and how they are being mitigated, the SYD procurement team is conducting further investigations, which include requesting additional information on recruitment practices, wages and working conditions, grievance mechanisms, and supply chain due diligence, along with supporting evidence such as employment contracts and payroll records.

This process will be completed in 2025, and SYD's response procedure will be utilised if required to address any identified concerns.

Decarbonisation and our renewables supply chain

As part of SYD's commitment to decarbonisation and responsible business practices, we continue to align our initiatives with our Net Zero 2030 (Scope 1 and 2 emissions) Roadmap. In 2024, we commenced the tender process for a rooftop solar project to reduce emissions and enhance energy resilience.

We recognise the complex challenges within the solar supply chain, particularly human rights risks in solar panel manufacturing. Our ongoing Modern Slavery Risk Assessment has identified potential forced labour risks in the sourcing of solar panel components.

We have integrated enhanced due diligence measures into our tender process for this project. Based on third-party advice, we require tenderers to submit an independent and globally recognised audit of their solar equipment manufacturer. This audit evaluates environmental, social, and governance (ESG) risks, including modern slavery concerns, through on-site inspections, staff interviews, and document reviews.

A successful review of audit results will be a precondition for contracting with the preferred tenderer. We will continue working with industry partners and experts to enhance transparency and accountability in our renewables supply chain.

Effectiveness of our actions and consultation

Assessing the effectiveness of SYD's actions

SYD's risk management framework is used to assess the effectiveness of our 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 and controls to be implemented, rating the effectiveness of these controls and identifying any additional actions to be undertaken to improve control effectiveness. These risks are then assigned to a business unit owned within the organisation.

Strengthening modern slavery response

In 2024, SYD began actioning key initiatives identified through the assessment and benchmarking of SYD's approach to managing modern slavery risks in its supply chain conducted by business and human rights advisory firm, Pillar Two, in 2023. A major outcome of this collaboration was the independent supply chain risk mapping, which pinpointed 10 priority risk areas for the airport to address. This mapping has provided a clear focus for our efforts to strengthen our modern slavery response.

Building on Pillar Two's review of procurement processes, policies, and practices, SYD has started embedding practical recommendations to improve how we assess and address modern slavery risks in our supply chain. These include updating the Supplier Survey and Guide to Procurement to reflect the updated risk mapping and updated procedures to better address the risks. Once these process improvements are completed they will be complemented with in-person training for the procurement team and SYD's online training for risk owners will be updated to reflect the changes. These steps help SYD to further align with the UNGPs and reflect the opportunities for continuous improvement.

Further details are outlined on page 9 under 'Decarbonisation and our renewables supply chain'.

Assessing the effectiveness of our response procedure

Following a Modern Slavery Working Group desk top scenario testing, SYD began implementing several improvements to our response procedure in 2024. These included having a more effective awareness process for reporting modern slavery by incorporating modern slavery into the Whistleblower training program. To support staff, a designated subject matter expert was established for employees to consult regarding suspected modern slavery incidents or indicators and to determine whether these warranted reporting.

Consultation with reporting entities

SYD remains dedicated to implementing and sustaining a comprehensive, group-wide approach to addressing modern slavery. Sydney Airport Corporation Limited (SACL), which operates Sydney (Kingsford Smith) Airport, manages all employee and supply chain relationships for SYD. As a result, the majority of the content outlined in this statement primarily pertains to SACL.

The reporting entities, along with SYD's owned and controlled entities, operate under a shared executive leadership, central management structure, and common directorship. Throughout this reporting period, senior management, executives, and directors of these entities were consulted and kept informed about the actions undertaken.

The preparation of this statement involved collaboration with key teams responsible for advancing SYD's responsible procurement practices. These teams include representatives from Procurement, Legal, Risk, Sustainability, and Corporate Governance. This statement has been reviewed by our Environmental Social Governance SteerCo and subsequently endorsed by the Directors of SACL.

Performance indicators

SYD measures the effectiveness of our modern slavery risk management using the following performance indicators:

Percentage of relevant contracts which include modern slavery risks and include protections	100%
Percentage of employees completing modern slavery risk training	23% ¹
Number of Tier 1 in-scope suppliers completing modern slavery audit survey	103 ²
Number of modern slavery cases identified/remediated	0

1. Being 100% of staff identified as risk holders by the Modern Slavery Working group completed training

2. 100% of suppliers SYD identified for third-party assessment completed audit surveys

Partnerships and stakeholder engagement

Australian Federal Police

SYD continued its relationship with the AFP to understand human trafficking and how airport workers can play a role in identifying people at risk of modern slavery and human trafficking as they pass through our terminals.

In 2024, the AFP National Human Trafficking Coordination Crime Command team provided SYD with posters and community cards from its *Look a little deeper* campaign, which we displayed at the Sydney Airport Service Centre from July onwards. This centre is visited by more than 3,000 precinct workers and contractors every month. AFP posters and information cards were also placed in high-traffic SYD operational staff areas in the terminals.

SYD would also like to acknowledge the support from team members in the AFP National Human Trafficking Coordination Crime Command and the Australian Centre to Counter Child Exploitation for their input and guidance in delivering our airport-specific human trafficking awareness campaign.

UN Global Compact and Global Compact Network Australia

SYD continued its commitment to uphold the principles of the UN Global Compact and remains a signatory to the UN Global Compact and a member of the Global Compact Network Australia and participates in its Modern Slavery Community of Practice.

In March, the SYD Modern Slavery Working Group Chair attended the Global Compact Network Australia Modern Slavery Community of Practice in Sydney. During the session, presentations were made by representatives of the Attorney-General's Department and the Monash University Business School to discuss the principle of 'continuous improvement' in Australia's modern slavery disclosure regime.

Our Modern Slavery Working Group Chair also participated in the 11th annual UN Global Compact Network Australian Dialogue on Business and Human Rights in June, where 150 human rights practitioners, government, civil society and academia representatives convened to discuss advancing the business and human rights agenda in Australia. The theme of the 2024 Dialogue was 'Let's talk about the 'smart mix of measures' here in Australia.' Attendees discussed the existing regulatory framework in Australia and considered what the ideal smart mix of measures could be to foster business respect for human rights.

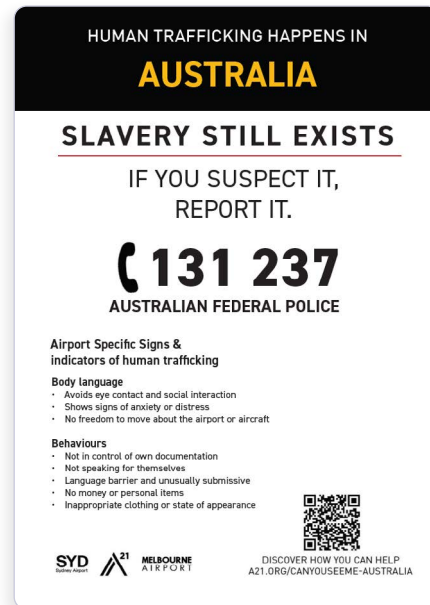
SYD precinct partners and suppliers

In 2024, we continued working closely with our suppliers to help them better understand modern slavery risks and SYD's expectations. To help us gain more in-depth insight into two key suppliers identified in our refreshed supply chain risk mapping, SYD actively collaborated with cleaning contractor Assetlink and our security provider.

Assetlink's Head of Safety & Security presented to SYD's Modern Slavery Working Group during the Q2 meeting, providing a comprehensive overview of the modern slavery challenges, principles, risks, and controls the organisation focuses on. This presentation highlighted Assetlink's commitment to transparency and detailed the processes it uses to mitigate risks within its operations and supply chains, reinforcing the shared commitment to eradicating modern slavery. SYD looks forward to continuing this collaboration with Assetlink and exploring further opportunities to strengthen these efforts.

We also collaborated with our security contractor and starting in 2025, all security screening staff complete airport-specific human trafficking training. The training will focus on how to recognise signs of exploitation and take appropriate action to protect potential victims of modern slavery. This will enhance the capability of security staff to identify vulnerable individuals, providing an additional layer of support alongside ABF officers at the T1 international terminal. For the T2 and T3 domestic terminals, where there are no ABF officers stationed, trained security staff will play a vital role in identifying and supporting potentially at-risk passengers.

Partnerships and stakeholder engagement



Anti-human trafficking organisation A21

In 2024, SYD began a new partnership with the global anti-human trafficking organisation A21. With offices in 14 countries, including Australia, A21 operates through a multi-dimensional approach of prevention, protection, prosecution, and partnership.

SYD engaged with A21 to deliver the “Can You See Me?” human trafficking awareness campaign throughout our terminals. For more information on this, please see Understanding and identifying modern slavery risks on page 5.

A21’s Asia Pacific Strategic Partnerships Manager presented at the Q3 Modern Slavery Working Group meeting, outlining how the charity leverages survivor-informed insights to guide its work, ensuring that strategies are shaped by the real-life experiences of those affected by trafficking. The presentation included videos from a Cambodian aftercare manager, a look inside a survivor counselling room and photos from an information sharing session being delivered to remote and at-risk areas in SE Asia. The session concluded with airport-specific signs and indicators of human trafficking as well as best practice on how to use a victim-centred approach and how to make a report and provide a referral.

A team from A21 also delivered a comprehensive human trafficking training session in November for SYD staff. The workshop focused on how to identify airport-specific signs and indicators of modern slavery and how to make a referral or report if staff suspect a passenger or member of the public is at risk of exploitation. To reinforce this training, A21 also created posters that were placed in staff areas, including the back of bathroom stall doors.



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 and 4
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	Pages 5 and 6
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 7, 8 and 9
5.	Describe how the reporting entity assesses the effectiveness of these actions	Page 10
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 10
7.	Provide any other relevant information	Pages 11 and 12

SYD