

Modern Slavery Statement

Statement for FY25



Acknowledgement of Country



Adelaide Airport Limited acknowledges Traditional Owners of Country throughout South Australia and recognises the continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past, present and emerging.

In celebration of NAIDOC Week 2025, Adelaide Airport proudly presented a new exhibition titled *The Next Generation: Strength, Vision, Legacy*, spotlighting the powerful work of 18 South Australian First Nations artists. Curated by internationally acclaimed Yankunytjatjara poet, author and artist Ali Cobby Eckermann, the exhibition transformed our terminal into a vibrant cultural corridor — inviting travellers and the wider community to pause, reflect and connect with the richness of First Nations culture.

Alongside the artworks, we showcased a collection of book covers from Magabala Books, Australia's oldest Indigenous publishing house, further honouring the voices and stories shaping the next generation. This exhibition continues our commitment to reconciliation and cultural respect, while reflecting our purpose — to proudly connect and shape South Australia.



A Message from our Chair & MD

Chair Robert Chapman & Managing Director Brenton Cox's Message

Adelaide Airport Limited operates Adelaide and Parafield Airports (together AAL). We are the aviation gateway to South Australia and the fifth busiest domestic and international airport in Australia. In the 2025 financial year saw a record breaking 8.7 million passengers travel through our terminal, including our busiest week on record of 185,489 passengers. Adelaide Airport Limited is a privately owned public company supported by long-term institutional shareholders. Our shareholders are five large superannuation funds who have held ownership since privatisation. These funds manage the retirement savings of many Australian families, making them indirect investors in our airports. Adelaide Airport Limited has been the custodian of the long-term leases of Adelaide and Parafield Airports from the Commonwealth of Australia since May 1998.

Parafield Airport is the home of General Aviation in South Australia and is a major world standard international training airport. It is an important part of the industry ecosystem with its own unique interactions with third party suppliers and training providers. We want our customers' experiences to be seamless and easy at every interaction. We also want prospective suppliers that we engage with through our procurement processes to have a positive

brand interaction. It is likely that these very same people who are suppliers in one interaction will be travelling customers at another time.

At AAL we set high expectations for ourselves and those we work with. Integrity and accountability are core values, and we recognise our responsibility to reduce the risk of modern slavery within our operations and supply chains. This report outlines the steps we are taking to strengthen oversight, improve procurement practices, and mitigate potential risks.

We are equally committed to long-term sustainability, including our goal of net zero emissions by 2050. Our approach to procurement reflects both environmental and human impacts, and we will continue to partner with our contractors and suppliers to ensure our business operates responsibly and sustainably.

No instances of modern slavery were identified within our operations or supply chains in this last financial year. We remain committed to vigilance, continuous improvement, and collaboration to ensure we play our part in addressing this critical global issue.



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Mandatory Reporting Criteria

Modern Slavery Act 2018 (Cht) Criteria	Reference in this Statement	Page
1. Identify the reporting entity and any entities the reporting entity owns or controls.	Our Company	1-2
2. Describe the reporting entity's structure, operations and supply chains.	Our Company Structure	3
	Our Operations	4
	Our Supply Chain	10
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.	Assessing Our Modern Slavery Risks	12-14
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Addressing Our Modern Slavery Risks	15
	FY25 Actions	22
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	The Effectiveness of our Actions	23
	Case Studies	24
6. Describe the process of consultation with any entities the reporting entity owns or controls.	Consultation	25
7. Other relevant information	Forward Vision	24





Our Company

Adelaide Airport Limited (AAL) is a privately owned public company and supported by five long-term institutional shareholders. Adelaide Airport Limited has been the custodian of the long-term leases of Adelaide and Parafield Airports from the Commonwealth of Australia since May 1998.





Our Company

Adelaide Airport is the gateway to South Australia enabling the movement of more than 8.7 million passengers a year as the fifth-largest airport in Australia. Parafield Airport is a wholly owned subsidiary of AAL and is South Australia's premier general aviation airport and is a major world standard training airport.

Adelaide Airport is South Australia's largest single employment site, directly employing more than 10,000 people on and off airport and contributing to the generation of a further 12,700 induced jobs. The airport continues to be a globally connected, next generation hub with designated industry clusters.

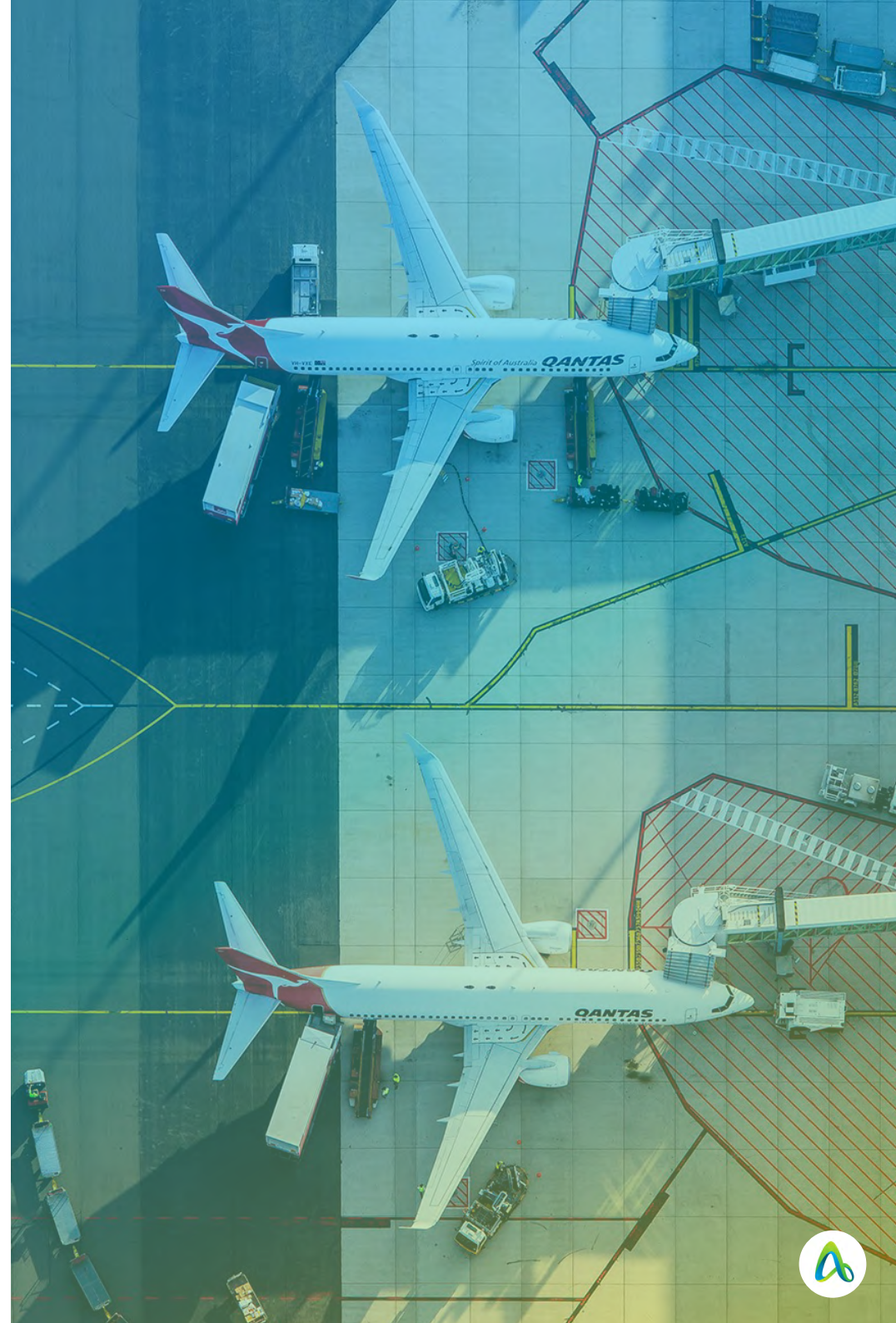
We are proud to be home to major companies such as Fleet space Technologies, BlueScope, Mitsubishi, BHP, Otis, Bunzl, Tesla and Australian Clinical Labs. Our Largest land release of 27 hectares at Airport Junction will create a dedicated freight and logistics hub for companies such as FedEx and DHL and be connected to State Government investments in major freight routes and road network.

The airport is currently served by nine international carriers, soon to be 12 by the end of calendar year 2025, and seven six domestic and regional carriers. Qantas will commence

international flights from October with services to Auckland, Air New Zealand will fly direct to Adelaide's sister city Christchurch from October, Cathay Pacific will resume flights to Hong Kong from November and we will welcome the first direct Adelaide to USA service in December when United Airlines commences its Adelaide to San Francisco route.

Adelaide Airport is executing a circa \$1 billion capital program including \$600 million aeronautical infrastructure investment which will see an upgrade of terminal facilities like check-in and security, terminal expansion including extra gates, and more room for more aircrafts with apron expansion projects.

Parafield Airport is a wholly owned subsidiary of Adelaide Airport Limited. It is South Australia's principal general aviation airport and is one of the largest pilot training airports in the southern hemisphere. The airport is home to seven aviation training companies and is a growing business and retail hub for Adelaide's northern suburbs. We have a clear vision to develop Parafield Airport as an aviation training centre of excellence and a vibrant economic hub, recognised for our positive influence on the community and the economy.



Our Company Structure

Adelaide Airport Limited



Parafield Airport Limited



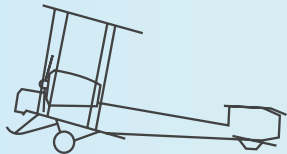
Adelaide Airport Management Limited



New Terminal Financing Company Pty Ltd



New Terminal Construction Company Pty Ltd



Adelaide Airport Vickers Vimy Exhibition Limited

(charitable organisation)

Adelaide Airport Limited (AAL) is the main operating entity holding the lease rights to manage and operate Adelaide Airport. Adelaide Airport Management Limited is responsible for the employment of all AAL group staff.

Parafield Airport Limited holds the lease rights to manage and operate Parafield Airport.

New Terminal Financing Company Pty Ltd is the AAL group financing vehicle and issues the group's external debt.

New Terminal Construction Company Pty Ltd was the construction company responsible for the original construction of Terminal 1 and holds the Redeemable Preference Shares.

Adelaide Airport Vickers Vimy Exhibition Limited is the sole member. Adelaide Airport

Vickers Vimy Exhibition Limited receives and administers the State and Federal funding that has been secured to relocate the Vickers Vimy Historical Aircraft from its current location in a memorial building adjacent to the long-term car park, to a central location in the expanded Adelaide Airport terminal building.



Our Operations

Financials

Sustainability

Carbon Emission Reduction



92%
Group

% reduction of scope 1 and 2 emissions from FY18 (Baseline year)

People & Culture

Employees

60%
Male

40%
Female

<1%
Non-binary



Total Recordable Injury Frequency Rate (TRIFR) for employees



4.1

4.2 below 5 yr average benchmark

Aero

Domestic & regional passengers



8.70M
+2%
YoY increase

International passengers



1.03M
+8%
YoY increase

Carriers



+3
new services

Revenue



+12%
YoY increase
\$318.2M

EBITDA



+11%
YoY increase
\$192.8M
(excluding fair value adjustments of investment properties)

NPAT



\$59.4M
(excluding fair value adjustments of investment properties)



Our Business

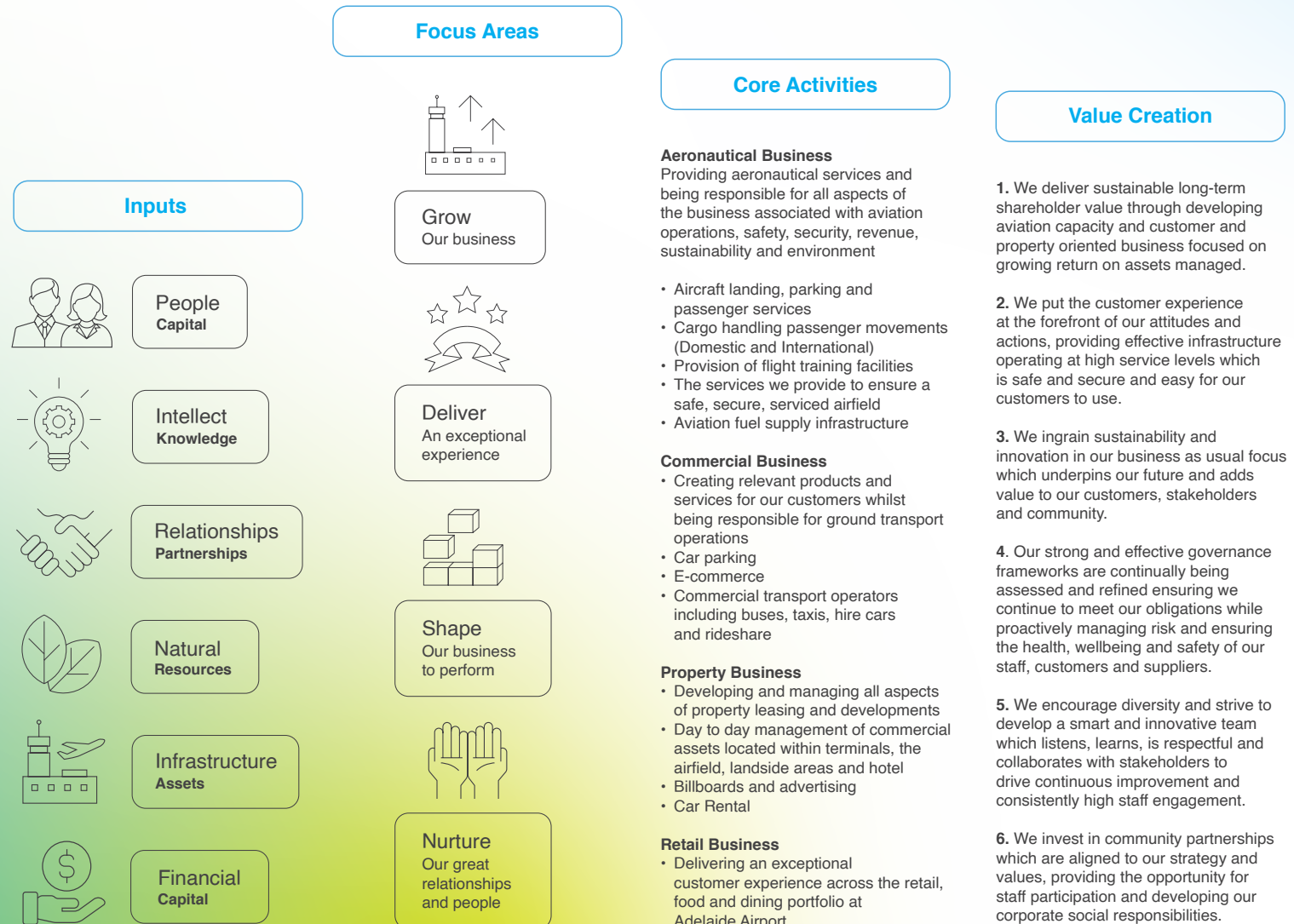
We are focused on creating sustainable long-term value for our shareholders and other stakeholders through the delivery of our Strategic Plan, in a manner that is consistent with our vision. Our value creation model depicts how we create value through six business value drivers, by identifying our key inputs, the activities we perform, and the resulting outputs and outcomes.



Our Business Model

How We Create Value

We are focused on creating sustainable long-term value for our shareholders and other stakeholders through the delivery of our Strategic Plan, in a manner that is consistent with our vision. Our value creation model depicts how we create value through six business value drivers, by identifying our key inputs, the activities we perform, and the resulting outputs and outcomes in terms of value creation.



2025 - 2029

Our Strategy

Operating Excellence

Everyone running our core business doing what they do every day with excellence, ownership and a mindset of continuous improvement.

Grow



Deliver



Shape



Nurture



Step Change Priorities

Requiring material investment, deep cross-functional collaboration and bespoke governance to monitor delivery.

Accelerate Property



Building upon the development ready plan.

Work Smarter



Formalising our business transformation maturity program.

Enhance the Experience



Being deliberate about our Kerb-to-Gate and Sense-of-Place vision.

Lead Sustainability



Staying ahead of the current and emerging sustainability related risks and opportunities.

Complete Aviation Network



Optimise our aviation capacity connections.



Adelaide Airport has established a comprehensive risk governance framework that enables seamless risk reporting and transparency. Both the Board and management are dedicated to upholding the highest standards of corporate governance and risk management.

Risk & Governance

The Board, through the Audit and Compliance Committee, is responsible for ensuring there are adequate policies in relation to risk management, compliance, and internal control systems, and receives comprehensive annual risk updates in addition to routine reports, addressing areas of significant or emerging risk.

Management, via the Risk Management Committee and the Risk Working Group, are committed to ensuring the Board can meet those responsibilities. Risk and compliance management maturity at the operational level is fostered via the Risk Working Group. It provides a forum for the transparent reporting of risk, compliance and incident information between the Risk Management Committee, Head of Risk, and risk owners.

Risk Management Framework

Adelaide Airport's risk management program takes a holistic enterprise approach and is designed to ensure that all risks (strategic, corporate, operational and project, are identified, assessed, effectively managed and monitored in accordance with the Enterprise Risk Management Framework.

The Framework, aligned with AS ISO31000:2018 provides users with a reference to assist in the identification, assessment, management and reporting of all risk types in accordance with our Risk Management Policy. It also outlines the methodology to assess the level of assurance against controls in place to manage all risk types.





Our Workforce

Our people enable us as an organisation. In this past year we have grown our workforce levels by more than 100 people and we have plans to expand the team further during the next reporting period as more of our major projects come online. Putting customer experience and organisational resilience at the core of our growth, we are building our team for the future needs of the organisation.

Recruitment was sequenced to allow the successful onboarding of over 72 new employees while nurturing and strengthening our values, behaviours and our strong culture.

All our employees are engaged under Australian Employment Laws. Recruitment is managed by our internal People and Culture team, supported by external recruiters for selected roles. All recruitment and onboarding is overseen by the People and Culture team in compliance with our relevant Policies and Procedures. As at 30 June 2025, AAL employed a total of 283 employees. All our employees are based in Adelaide, 278 employees at the Adelaide Airport in 6 different offices at and around the Adelaide Airport terminal and 5 employees at the Parafield Airport.



283 Total Employees

275 Permanent Employees

4 Fixed Term Contract

4 Casual Employees

Employees

60% Male

40% Female

<1% Non-binary

35 Contingent or Temporary Workers

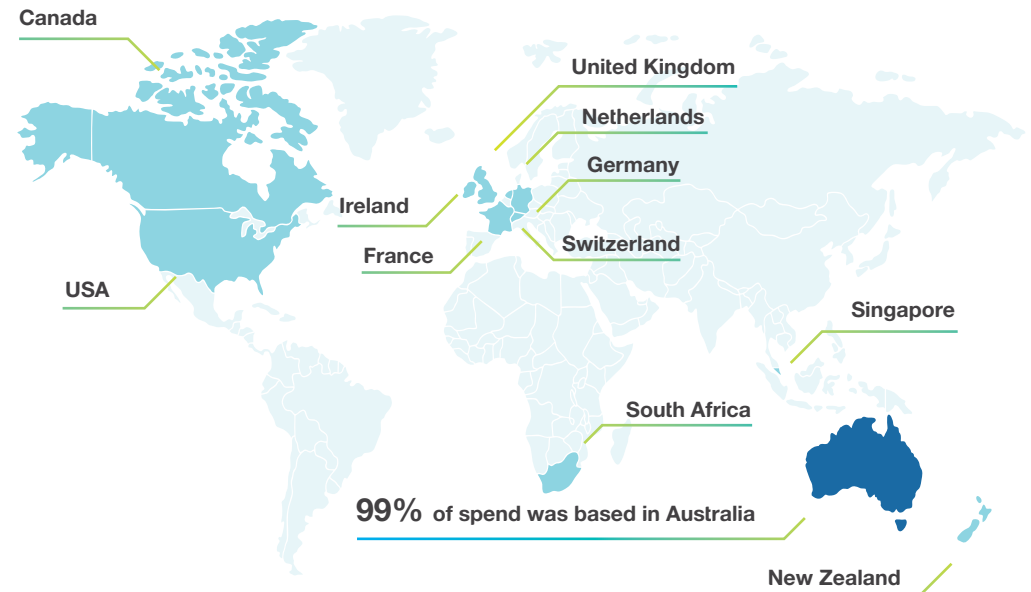


Our Supply Chain

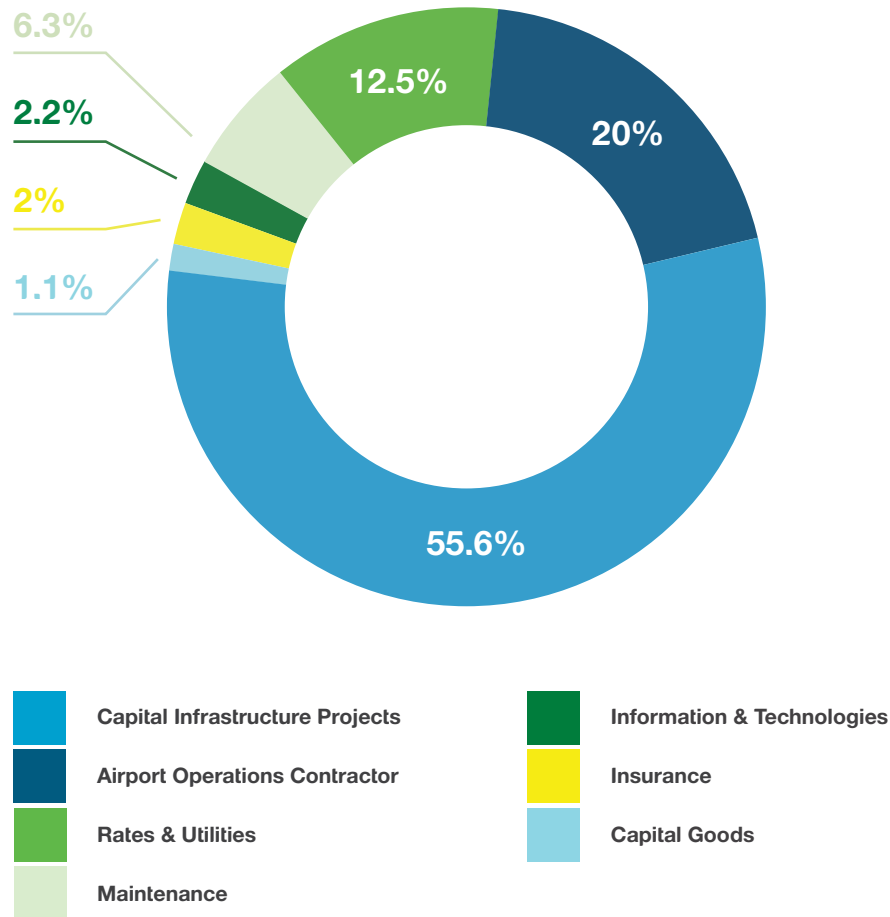
All procurement at AAL is guided by our Procurement Policy and Procedures. These procedures cover every stage of the process – from identifying needs, forming project teams, and developing scopes and specifications to selecting suppliers, managing contracts, and reviewing engagements. Our procurement and contract management practices include rigorous due diligence to ensure alignment with our values, regulatory compliance, and sustainability principles, including modern slavery obligations. We actively seek to partner with organisations that share our commitment to sustainability and work collaboratively to reduce the risk of modern slavery within our supply chain.

In reviewing our supply chain, we have adopted The United Nations Guiding Principles on Business and Human Rights, which recommends businesses to focus on assessing general areas of operations and supply chains where modern slavery risks are most significant. As a result, we prioritise these risks focusing on the most 'severe' risks, i.e. those that would cause the most harm to people, have the gravest impact or scale, or where delayed response would make them irremediable.

Our supply chain is wide-ranging and global and incorporates a range of products and services across various industry sectors. At its most complex, our supply chain is several tiers deep, and in multiple jurisdictions. In FY25, AAL spent \$287 million on goods and services from 700 suppliers across various categories including Capital Construction & Property, Utilities, Airport Services, Consulting, IT Hardware and Software, Facilities Management and Maintenance. More than 99 percent of this expenditure and over 96 percent of our suppliers were based in Australia, with the remainder located in Canada, Ireland, Netherlands, New Zealand, Singapore, South Africa, Switzerland, United Kingdom and United States of America. None of these overseas suppliers are based in the countries rated high risk for Modern Slavery.



Top 80% of AAL Supplier Spend



The most significant spend categories in FY25 were:

Capital Infrastructure Projects

This includes Projects Consultants, Civil and Construction Contractor who design, develop and construct AAL's infrastructure assets such as terminal, runways, car parks, offices and civil works as part of our capital construction projects. In FY25 this included the terminal expansion and Main Runway and Taxiway Overlay Project which comprised the majority of our overall spend.

Airport Operations Contractor

This includes our security screening service, cleaning, baggage handling contractors and AAL fuel facility operator.

Rates and Utilities

This includes council rates, water, electricity charges and the Department of Infrastructure and Transport rates.

Maintenance

This includes contractors that maintain AAL assets, perform infrastructure operations and maintenance services including specialists in lifts and elevators, aero bridges, baggage handling systems, security screening systems, etc.

Information and Technologies

AAL uses a variety of technical and general corporate IT systems and software which includes IT equipment, application, networking and database software, Data network, Cyber security applications, Airport Terminal equipment etc.

Insurance

This includes corporate insurances.

Capital Goods

This includes the procurement of our assets.





Assessing our Modern Slavery Risk



Our Modern Slavery Risks

Operational Risk

There is an inherent risk that AAL could be involved in modern slavery through our workforce practices. However, considering the employment arrangements under the Fair Work Act 2009 (Cth), along with our governance and policy framework and employee training, we have determined that the residual risk of employee exploitation is low. AAL does not directly engage in modern slavery practices.

Over 97 percent of AAL employees hold permanent positions, giving us direct visibility into their employment terms and conditions. Our robust policy framework, accessible grievance mechanisms, and comprehensive training are crucial controls to address the risk of modern slavery within our operations. For employees hired indirectly, we collaborate with labour providers to understand and assess their risk controls and their application to workers. Current controls include clearly communicating our sustainability and human rights expectations and establishing explicit contracts with labour providers.

Supply Chain Risk

Understanding the risks of modern slavery within our supply chain continues to be a top priority for AAL. We have classified our modern slavery risk areas as follows:

By Spend

- Contractors delivering Capital Infrastructure Projects (construction and consulting)
- Airport Operations Contractors

By Category

- Procurement and outsourcing of support services e.g. cleaning, trolley management, bussing, security screening etc.;
- Construction and Infrastructure including the products and raw materials in our supply chain;
- IT hardware and software;
- Other low value indirect procurement e.g. uniforms, safety clothing, stationery etc.;
- Sub-contractors; and
- Human trafficking through the airport e.g. international arrivals.

We categorise our supply base by Tiers, whereby a Tier is the measure of the 'distance' of a supplier from the organisation.

We hold the greatest visibility and leverage over our Tier 1 suppliers and of course, our own operations. We have progressed our Modern Slavery risk assessment of our own operations and all high spend suppliers and high-risk suppliers based on location and category.

1

Tier 1

Directly supplies products or services to us, usually through a contractual arrangement.

2

Tier 2

Supplies products or services to our Tier 1 supplier.

3

Tier 3

Supplies products or services to our Tier 2 supplier.



Modern Slavery Risk Assessment

The majority of our Tier 1 suppliers are based in Australia and supply goods and services that are procured and produced within Australia. The ongoing review of the Modern Slavery risk assessment through engagement with key stakeholders assessed that the risk of modern slavery in the majority of our operations and Tier 1 supply chain is low as:

- The work is predominantly skill based and requires industry and/or professional qualifications;
- Our supply chains are usually short, and we utilise established and consistent contractors;
- To work on our site, many contractors are subject to extensive background check requirements which confirm identity, right to work and any criminal record; and
- Our staff have regular visibility of the people and the work being undertaken.
- Our Procurement and Contract Management Procedure outlines clear guidelines for the due diligence required to combat modern slavery.
- Modern slavery clause is added to all the supplier and contractor's contracts.
- Our tender template includes a mandatory section relating to the management of modern slavery risk.
- AAL issues annual contractor compliance statements to all our high risk high spend suppliers.
- AAL runs quarterly Modern Slavery assurance program where our high spend high risk suppliers get audited (desktop) for Modern Slavery risks.



Addressing our Modern Slavery Risk



Policy Framework

Our governance framework is underpinned by policies that are reviewed every two years and approved by our Managing Director. Our policy framework supports the management of modern slavery risks in our business and communicates our human rights expectations. It applies to our directors, employees, contractors and consultants.

Code of Conduct Policy

Our Code of Conduct sets clear expectations for the behavior of our employees and contractors, promoting a positive work environment and ensuring that everyone's rights are respected and upheld.

Grievance Policy

Our Grievance Policy offers a systematic and organised approach to addressing employee grievances. It outlines clear guidelines and processes to ensure consistent and fair handling of issues, preventing ad-hoc or biased decisions. This policy provides employees with a transparent procedure for raising and resolving grievances.

Risk Management Policy

Our Risk Management Policy provides direction for an integrated and consistent approach to risk management practices at AAL. It defines and identifies our risk appetite, risk management process, responsibilities across all levels of the organisation from our Board to employees, reporting requirements and our strategic approach to risk.

Fair Place of Work Policy

Our Fair Place of Work Policy aims to ensure that all persons participating in the workplace including contractors, stakeholders or members of the public are treated with respect, dignity and fairness to create an environment which promotes positive working relationships, a high level of customer service and alignment with our Values. The objectives of this Policy are to ensure all employees are aware of what constitutes bullying, harassment, sexual harassment and unlawful discrimination and their rights and responsibilities in preventing and managing any such incidents. It details our commitment to upholding and safeguarding human rights within our operations and supply chain, while ensuring that remedies are available for any negative human rights impacts and outlines the steps for reporting any actual or suspected violations.

The intended outcome is a diverse, gender equal workplace free from all forms of bullying, harassment and discrimination.

Inclusion and Belonging (I&B) Policy and I&B Focus Group

Our I&B Policy outlines our dedication to fostering a diverse and inclusive work environment. It defines what diversity and inclusion mean to us and specifies the behaviours we expect from our employees to support and enhance a welcoming and equitable workplace. It is about valuing the differences each individual brings in knowledge, experience, skills and perspectives. Broadly these differences may include age, gender, physical ability, disability, nationality, cultural background and ethnicity, marital, family or relationship status, religious beliefs, sexual orientation and gender identity.

Our I&B Working Group drives the overall inclusion and belonging strategy. The objective is to promote, advise and lead the introduction of I&B programs/initiatives that continues to build a sense of belonging within a diverse and inclusive workforce at AAL.

WHS and Health & Wellbeing Policy

AAL is dedicated in creating a safe and healthy environment for all employees, contractors, and visitors and our WHS and Health Wellbeing Policy reflects our commitment. The objective of these policies is to support and improve employee health and wellbeing through designing and maintaining a suitable Health and Wellbeing Plan and Program that supports the needs of our employees. It outlines our objectives for maintaining our health and safety management system, ensuring compliance with relevant legislation, setting targets for work-related injury and illness, fostering workforce engagement in health and safety matters, and building strong stakeholder relationships to enhance overall outcomes.

Sustainability Policy

Our Sustainability Policy establishes the standards for AAL to meet its sustainability targets. It outlines the principles that steer our planning, operations, and decision-making processes. These principles focus on fostering a safe, diverse, equitable, and inclusive workplace, supporting the communities where we work, and effectively managing sustainability risks.



Modern Slavery Guidelines

Our Modern Slavery Compliance Guidelines are designed to form part of our broader organisation-wide Procurement Policy and Framework and Corporate Social Responsibility Policy. They outline a consistent approach to engaging with the market and managing contracts, aimed at mitigating the risk of modern slavery in our operations and supply chain.

The Guidelines provide information to:

- Explain the concept of modern slavery and what needs to be done where an individual suspects modern slavery is taking place in our operations or supply chains;
- Clarify each individual's role in complying with applicable legislation and policies, including key responsibilities of our executive team, management and other stakeholders;
- Outlines the response process upon receipt of a modern slavery incident; and
- Require that modern slavery is embedded into all procurement stages, from the development of sourcing strategies, tenders, evaluations, contract clauses and KPIs.

Whistleblower Policy

We are committed to achieve high standards of ethical conduct and compliance with our legal obligations. This commitment includes creating and maintaining a working environment in which all people are able to freely raise concerns regarding actual or suspected unethical, unlawful or undesirable conduct in a safe, supportive and confidential environment.

Our Whistleblower Policy outlines the process to respond to any reports of actual or suspected misconduct, including instances of modern slavery. The policy applies to any of our officers or employees, suppliers and associates, a relative of an employee and former employees.

The Whistleblower Policy was reviewed to ensure alignment with modern slavery requirements and best practice. The policy was communicated to all staff and major suppliers and is published on our website.

Reconciliation Action Plan

Our Reflect Reconciliation Action Plan sets out our commitment to promote Aboriginal and Torres Strait Islander rights and reconciliation through building relationships, respect, and creating opportunities between AAL and local Aboriginal and Torres Strait Islander communities.

We are committed to ensuring that we are enhancing value for Aboriginal and Torres Strait Islander communities and their experiences in working with us. We want to ensure we are inclusive and represent the diversity of the Australian community by harnessing the unique knowledge, experience and expertise of Aboriginal and Torres Strait Islander peoples in our operations.

Sustainable Procurement Guidelines

Our Sustainable Procurement Guidelines are designed to ensure strategic, operational, legal, reputation, financial, climate and other Environmental, Social or Governance (ESG) related risks are identified, assessed, effectively managed and monitored to enable achievement of our business objectives.

Supplier Code of Conduct

AAL's Supplier Code of Conduct has been established to ensure our suppliers and contractors are aware of their obligation to meet our expectations of responsible behaviour to their subcontractors and employees. This policy includes standards related to human rights, equality, ethics and ethical trading.

Failure by the supplier to adhere to the Supplier Code of Conduct can result in termination of the supply arrangement. In FY25, there have been no supplier terminations for non-compliance.

Procurement Policy

Our Procurement Policy outlines the framework and fundamental principles governing our procurement activities. We aim to balance the economic, social, and environmental factors in all procurement activities, and seek to engage with suppliers who share our commitment on sustainability, health and safety, cybersecurity, and modern slavery. We aim to mitigate adverse impacts to the environment and society while upholding economically viable business practices throughout our operations and supply chains.



Embedding Sustainability in our Business

Sustainability is a core part of our business operations. The value we place on sustainability helps us respond to and pre-empt the complex social, environmental, market, and technological influences within which we operate.

We recognise the importance of the Commonwealth Modern Slavery Act 2018 (the Act) and the integral role it will play in further solidifying the sustainability of the community and ethical business practices.

We already see a strong sustainability culture throughout our organisation, where individual teams are making sustainable thinking part of their projects and daily operations. This culture is one of our greatest assets, and we will continue to nurture it as our teams grow and we onboard new people.

AAL places considerable importance on maintaining strong controls within our business. Our structure includes clearly defined lines of accountability and delegation of authority. Adherence to the company Code of Conduct

is required at all times, and our Board actively promotes a culture of quality and integrity. As such, AAL has continued to develop our modern slavery governance structure to ensure the effective implementation of our modern slavery action plan to mitigate this risk.

This includes:

- Conducting regular reviews of the modern slavery risk register to ensure appropriate controls remain in place and are effective in managing modern slavery risk.
- Progressing towards the achievement of actions identified in our modern slavery roadmap.
- Implementing a Third-Party Risk Management Framework that includes the consideration of Modern Slavery Risk.

We have numerous policies and frameworks in place to mitigate human rights and modern slavery risks.



Additional Tools & Initiatives

We have developed several tools and templates to support a proactive approach to mitigating modern slavery risk.

These include:

- A Project Risk Assessment template to aid identification and management of modern slavery risk.
- A detailed Procurement Risk Assessment template and prompt sheet for contract owners and operations managers that can be used to identify, assess and capture management of modern slavery risks associated with high-risk suppliers, tenants and operators;
- Contract clauses which require that minimum standards in ethical, human rights and health and safety are met;
- A mapping tool to map complex supply chains.
- An Annual Compliance Commitment Declaration which requires suppliers to provide an annual declaration that they understand their obligations and have not contravened any laws, including Modern Slavery Laws and other Commonwealth Workplace Laws;
- A Modern Slavery Compliance Plan to ensure that AAL continues to discharge its responsibilities under the Act and that controls remain in place; and
- The Modern Slavery Assurance Program, which assesses high risk contractors/suppliers for the controls they have in place to manage Modern Slavery risk in their operations and supply chain.



Working with our Suppliers

AAL is actively engaging with our suppliers to understand their maturity in managing modern slavery risks within their own supply chain. Many suppliers have systems, processes, policies and procedures in place enabling them to effectively meet modern slavery due diligence requirements. We are focusing on building closer relationships with our key suppliers to better understand their operations and ensure alignment with our expectations. This effort is supported by our Assurance Program, which evaluates controls for high-risk suppliers and fosters discussions to advance the management of modern slavery risks.

In the coming year, we will maintain a flexible approach to enhance our maturity and expectations of suppliers. Over the long term, we plan to adopt a more formalized and consistent method for monitoring and measuring supplier adherence to a defined set of standards.

Raising Awareness Across our Business

We recognise that long term sustainable change takes time, and to be successful in achieving our united goal with our suppliers to eradicate modern slavery in supply chains, it's important that our people are educated and informed as they are at the forefront of all interactions, and actively engage with customers and suppliers on a regular basis.

As such, we are actively raising awareness and understanding amongst our people on the importance of preventing modern slavery and human trafficking, the risk indicators and signs to look out for, and how to escalate concerns. We will continue to raise awareness more broadly across employees and suppliers.



An aerial photograph of a white airplane with red and black accents on its tail, positioned on a dark asphalt runway. The runway has white and yellow dashed lines. To the left of the runway, there is a large, abstract graphic consisting of several overlapping, curved bands in shades of blue, green, and yellow. The background is a clear blue sky.

Our Actions

In FY25 we continued to strengthen our governance and processes for managing modern slavery and human rights risks.



FY25 Actions

Grievance Mechanism

AAL provides both internal and external channels for directors, employees, contractors, suppliers, and their family members to report concerns about unethical behaviour or policy breaches, including issues related to fraud, harassment, discrimination, misleading conduct, unsafe work practices, and modern slavery.

Our independent external whistleblowing hotline service is available through a toll-free telephone number, online, or by post. Reports can be made anonymously using any of these methods.

Employee Engagement & Training

- Modern Slavery training now forms part of our on-boarding compliance suite of programs for all new starters.
- All staff get Modern Slavery refresher training every two years.
- All People Leaders participated in an on-demand Psychosocial Hazard Awareness training program.
- Whistleblower training was rolled out to the Senior Leadership Team.
- We test our performance with internal customer experience surveys and staff wellbeing and engagement surveys.

Governance & Policy

- AAL is committed to a Reflect RAP and has undertaken numerous initiatives to support Indigenous communities and businesses. In line with this commitment, we have strengthened our procurement processes by embedding Indigenous procurement objectives into our existing procurement guidelines, ensuring they are an integral part of our business practices.
- AAL established an Inclusion and Belonging Working Group to foster a diverse, respectful, and equitable workplace. The group plays a key role in promoting awareness, embedding inclusive practices, and supporting initiatives that strengthen cultural understanding and employee wellbeing. Its efforts complement our organisational values, ensuring that respect for human rights and dignity is central to how we operate.

Sustainability

- We have continued to roll out internal training sessions on Sustainability at AAL to support our teams to embed sustainability thinking into their day-to-day activities and decisions.
- We have undertaken a detailed refresh of our materiality assessment, which included broad stakeholder engagement on issues including modern slavery and supply chain transparency.
- AAL teams have included sustainability into contract and procurement activities. In particular, sustainable design and materials selection (including supply chain visibility) and modern slavery considerations have been embed in major terminal expansion project.
- Adelaide Airport also chairs the Australian Airports Association (AAA) Sustainability Working Group. This group's role is to communicate, collaborate, and consult on all matters supporting best practice airport sustainability, including the adoption of sustainable practices, environmental stewardship, and social responsibility.

Supply Chain Practices

- Commenced development of a strategic tool designed to enhance transparency and proactively manage risks within complex supply chains
- The implementation of new Project and Procurement Risk Assessment templates which include the consideration of modern slavery.
- Continued implementation of a Modern Slavery Assurance Program, which assesses high risk contractors/suppliers for the controls they have in place to manage Modern Slavery risk in their operations and supply chain.



The Effectiveness of our Actions

Our Enterprise Risk Management Policy and Framework (Risk Framework) provides direction for an integrated and consistent approach to risk management practices across our business.

The ongoing management of modern slavery risk and assurance activities will be carried out in accordance with the Risk Framework which includes dedicated modern slavery risk identification and assessment, modern slavery risk register reviews and focused control assurance reviews.

Outcomes of these activities are captured in our risk and incident management system tool (CAMMS) and are reported to the Board through our established governance forums. All risks within the corporate risk register, including modern slavery, are reviewed by the Board on an annual basis. This includes a review of the current modern slavery risk evaluation and the effectiveness of our risk controls and treatments.

Modern slavery actions are integrated into our regular management practices and operational activities. Our modern slavery compliance

program delivery is led by our Risk and Compliance business unit. These governance forums include:

- The Risk Working Group is comprised of Senior Managers and meets monthly to address risk and compliance matters in accordance with a defined Terms of Reference; and
- The Risk Management Committee consisting of our Executive Management team, which reports into the Board Audit and Compliance Committee.

AAL will measure our year-on-year growth using the maturity assessment, as outlined earlier in this statement, and will report on this at the governance forums outlined above.

During the reporting period, no instances of modern slavery or labour rights concerns were reported through our internal or external whistleblower and grievance mechanisms.

Forward Vision

In FY26 we will

- Continue to grow the knowledge and awareness of all people leaders in ensuring a psychologically safe environment for everyone.
- Ensure all AAL employees are kept up to date with relevant Modern Slavery and Whistleblower awareness training.
- Continue to advance our commitment to upholding human rights throughout our operations and supply chain.
- Continue to strengthen supply chain engagement to support effective and efficient management of sustainability and modern slavery risks for major projects.
- Align strategies and operations with the 10 principles of The UN Global Compact.
- Be implementing Third Party Risk Management Framework which includes the consideration of Modern Slavery Risk.
- Enhance our Sustainable Procurement Procedure for ease of implementation across the business.



Case Studies

Low Voltage Preventative/ Reactive Maintenance Tender



While tendering for low voltage preventative and reactive maintenance, AAL requested a pricing model inclusive of emergency and out of hours rates to determine the minimum call-out rates at various times:

- Monday- Friday
- Outside Normal working hours
- Saturdays
- Sunday
- Public Holidays
- Emergency

The evaluation panel reviewed each tender submission including hourly rates and minimum call-out rates. Understanding these rates ensures that the contractor is paid appropriately, neither over or under charging, helping to mitigate risks related to modern slavery and anti-slave labour practices. As part of the tender process, all participants were required to complete and sign the Modern Slavery section, affirming their compliance with Commonwealth workplace and modern slavery laws, including adherence to fair work instruments.

Design & Construct Tender



While conducting the Request for Tender process to select a contractor to design and build Richmond Road Bridge at Airport East AAL assessed each tenderer's processes in managing modern slavery risks and ensuring compliance with the Act.

Key Modern Slavery Compliance Actions:

- Strengthened supplier due diligence during the tender process by requiring all bidders to sign our Modern Slavery Commitment Statement, affirming their compliance with the National Employment Standards, relevant Fair Work Instruments, and the Modern Slavery Act.
- Incorporated contractual obligations requiring the contractor to comply with our Modern Slavery clause and adhere to the Modern Slavery Act.
- Empowered project teams to proactively identify and manage risks, with guidance and support from the Sustainability and Social Impact team.
- Embedded social procurement practices to drive ethical sourcing and labour protections.



Consultation

Whilst AAL has a number of entities it owns and controls, these entities have a common Board and staff which have oversight of all risks of modern slavery across our operations. All staff abide by the same policies and procedures and manage modern slavery risk in accordance with AAL's Enterprise Risk Management Framework.

This statement has been prepared in consultation with the key Business Units that work together to drive responsible procurement for AAL. This statement was approved by the Board of Adelaide Airport Limited in its capacity as principal governing body of Adelaide Airport Limited on 31 March 2026.



Brenton Cox
Managing Director



Contact Us

If you have any feedback about this Modern Slavery Statement and our strategic plan, please contact us.

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