

# Modern Slavery Statement

Statement for FY24





# 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.

As part of NAIDOC Week 2024 we welcomed Artist in Residence, Jaylene Ware (Jayla), to paint in-person at Adelaide Airport. Jayla is a talented Indigenous Contemporary artist and proud Wirangu, Kokatha and Antakirinja Matu-Yankunytjatjara woman. The above photo captures Jayla painting our specially commissioned artwork that not only embodies the spirit of reconciliation, but also reflects our airport purpose: to proudly connect and shape South Australia.







# A Message from our Chair & MD

## Chair Robert Chapman & Managing Director Brenton Cox's Message

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Adelaide Airport Limited operates Adelaide and Parafield Airports (together AAL). Adelaide Airport is the aviation gateway to South Australia, responsible for connecting our people, produce and products to the world. In the 2023-24 financial year we achieved record passenger numbers through our airport, surpassing our best pre-covid year. We are embarking on an ambitious capital works plan over the next 5 years which will see us engage multiple third-party contractors and suppliers to deliver our vision.

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 with be travelling customers at another time.

At AAL we have high expectations of ourselves - behaving with integrity and accountability are core company values. It is incumbent on us as a business to do everything we can to combat the risk of modern slavery across our operations. Our consideration of this issue and the steps we have taken to mitigate these risks are detailed in this report.

We are also committed to driving sustainability and reaching our goal of net zero emissions by 2050. As part of this work, we are shaping our procurement practices through the sustainability lens, both environmental and the human impact. Removing the risk of modern slavery in our supply chains is an important part of operating as a long-term sustainable business. Our teams are committed to work with our external contractors, providers and our partners to manage and mitigate these associated risks.

AAL did not identify any instances of modern slavery within our operations or supply chain in FY24. We will continue to work to improve our practices and regularly monitor our risks to ensure we are doing all we can to combat modern slavery in across our operations.



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# Our Company

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Adelaide Airport Limited is a public, unlisted South Australian company. The Adelaide Airport group is comprised of five entities. All group entities have a common Board and Board meetings are held contemporaneously.





# Our Company

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Adelaide Airport Limited (AAL) is a public, unlisted South Australian company but privately owned 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.

Adelaide Airport is the gateway to South Australia enabling the movement of more than 8.5 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.

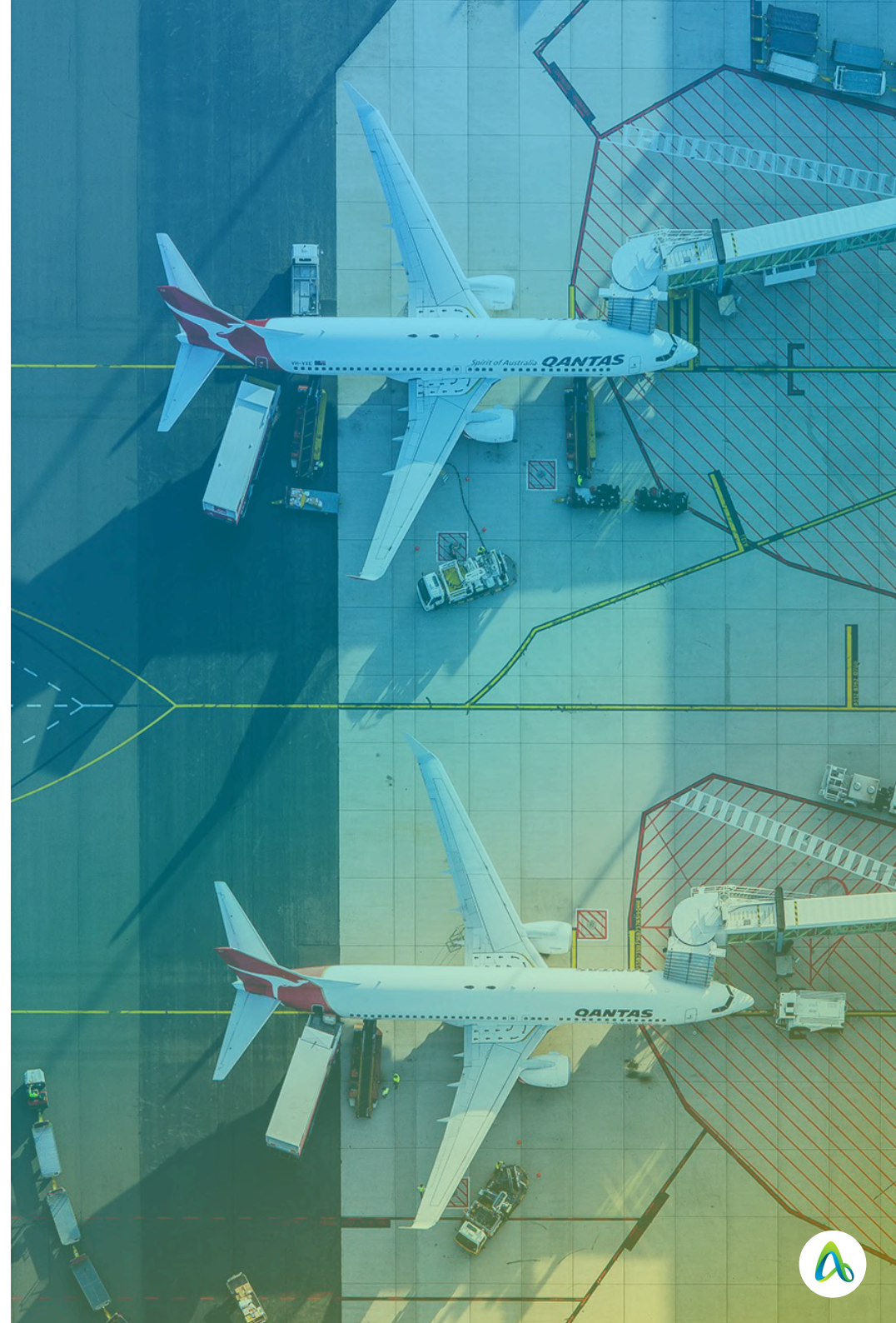
Adelaide Airport is South Australia's largest single employment site, directly employing more than 10,000 people on and off airport and contributing to the generation of a further 12,700 induced jobs. The airport continues to be a globally connected, next generation hub with designated industry clusters.

We are proud to be home to major companies such as Mitsubishi, BHP, Otis, Bunzl, Tesla and Australian Clinical Labs. Significant development is underway on our new freight and logistics

precinct, Airport Junction, creating a dedicated freight and logistics hub for companies such as FedEx and DHL.

The airport is currently served by eight international carriers and seven domestic and regional carriers. A ninth international carrier, Emirates, will recommence services in October 2024. Adelaide Airport is executing a \$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, expansion of the apron, and duplication of the pick-up and drop-off zone.

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



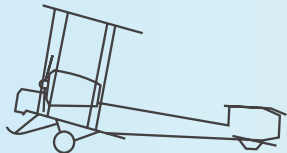
Adelaide Airport Management Limited



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

## Sustainability



### Carbon Emission Reduction

% reduction of scope 1 & 2 emissions versus  
**73%** Adelaide & Parafield Airport

Our commercial business revenue streams comprise retail tenancies, car parking, car rental and advertising. We have incorporated ecommerce platforms across all of these streams and look forward to continuing to grow and support our commercial partners.

## Aero



### Domestic & Regional Passengers

Year on year increase to 7.6M  
**+7%** increase in 2024



### International Passengers

Year on year increase to 958K  
**+37%** increase in 2024



### Airline Routes

**+5** new services

## Financials



### Revenue

Revenue year on year increase to 284.6M  
**+13%** increase in 2024



### EBITDA

Year on year increase to 173.4M. Excluding fair value adjustments of investment properties.  
**+11%** increase in 2024



### Net Profit After Tax

Excluding fair value adjustments of investment properties.  
**54.4 Million**

## People & Culture



### Employees

**41%** Female  
**59%** Male  
**<1%** Non-binary



### Staff Engagement

**79%** in 2024



### Injury Frequency

Total recordable injury frequency rate. 2.9 below 5yr average benchmark  
**5.2%**





# 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

## Carbon Emission Reduction

### People

Capital



### Intellect

Knowledge



### Relationships

Partnerships



### Natural

Resources



### Infrastructure

Assets



### Finance

Capitol



## Focus Area

### Grow

Our Business



### Deliver

An exceptional experience



### Shape

Our business to perform



### Nurture

Our great relationships and people



## Core Values

### Aeronautical Business

Providing aeronautical services and being responsible for all aspects of the business associated with aviation operations, safety, security, revenue, sustainability and environment

- Aircraft landing, parking and passenger services
- Cargo handling passenger movements (Domestic and International)
- Provision of flight training services
- The services we provide to ensure a safe, secure, serviced airfield
- Aviation fuel supply infrastructure

### Commercial Business

- Creating relevant products and services for our customers whilst being responsible for ground transport operations
- Car parking
- Concierge services
- Commercial transport operators including buses, taxis, hire cars and rideshare

### Property Business

- Developing and managing all aspects of property leasing and developments
- Day to day management of commercial assets located within terminals, the airfield, landside areas and hotel
- Billboards and advertising

### Retail Business

- Delivering an exceptional customer experience across the retail, food and dining portfolio at Adelaide Airport

## AAL Value Creation

1. We deliver sustainable long-term shareholder value through developing aviation capacity and customer and property oriented business focused on growing return on assets managed.

2. We put the customer experience at the forefront of our attitudes and actions, providing effective infrastructure operating at high service levels which is safe and secure and easy for our customers to use.

3. We ingrain sustainability and innovation in our business as usual focus which underpins our future and adds value to our customers, stakeholders and community.

4. Our strong and effective governance frameworks are continually being assessed and refined ensuring we continue to meet our obligations while proactively managing risk and ensuring the health, wellbeing and safety of our staff, customers and suppliers.

5. We encourage diversity and strive to develop a smart and innovative team which listens, learns, is respectful and collaborates with stakeholders to drive continuous improvement and consistently high staff engagement.

6. We invest in community partnerships which are aligned to our strategy and values, providing the opportunity for staff participation and developing our corporate social responsibilities.

Underpinned by  
Our Values:

**A**

Be Accountable  
& Authentic

**I**

Conduct  
Ourselves with  
Integrity

**R**

Be Responsive,  
Efficient &  
Respectful

**P**

Take Pride in our  
Achievements

**O**

Be Open, Friendly  
& Encourage  
Diversity

**R**

Build Relationships  
Based on Trust

**T**

Foster great  
Teams





# Our Strategy

Our Strategic Plan is at the heart of everything we do

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

## Operating Excellence



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 AAL's Business Transformation Maturity Program



### Enhance the Experience

Being deliberate about AAL's Kerb-to-Gate and Sense-of-Place vision.



### Lead Sustainability

Staying ahead of 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, our Risk lead manager, 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 100 new people 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 2024, AAL employed a total of 245 people. All our employees are based in Adelaide, 240 employees at the Adelaide Airport in 6 different offices at and around the Adelaide Airport terminal and 5 employees at the Parafield Airport.



## 245 Total Employees

236 Permanent Employees

7 Fixed Term Contract

2 Casual Employees

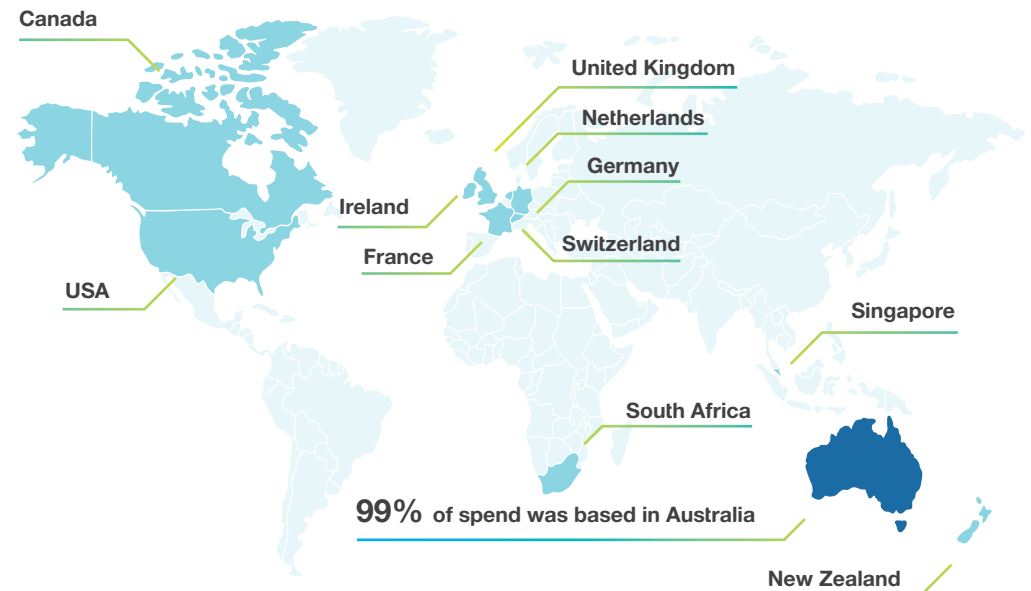
## 13 Contingent or Temporary Workers

# Our Supply Chain

All the procurement at AAL is guided by our Procurement Policy and Procedures. Procurement Procedures covers everything from identifying needs, gathering project team, developing scope and specification, selecting suppliers, to overseeing contracts and reviewing engagements. Our procurement and contract management process involves thorough due diligence to ensure alignment with our values, regulatory compliance, and adherence to our sustainability principles, including modern slavery requirements. We aim to collaborate with organisations that share our sustainability priorities to mitigate the risk of modern slavery in our supply chain.

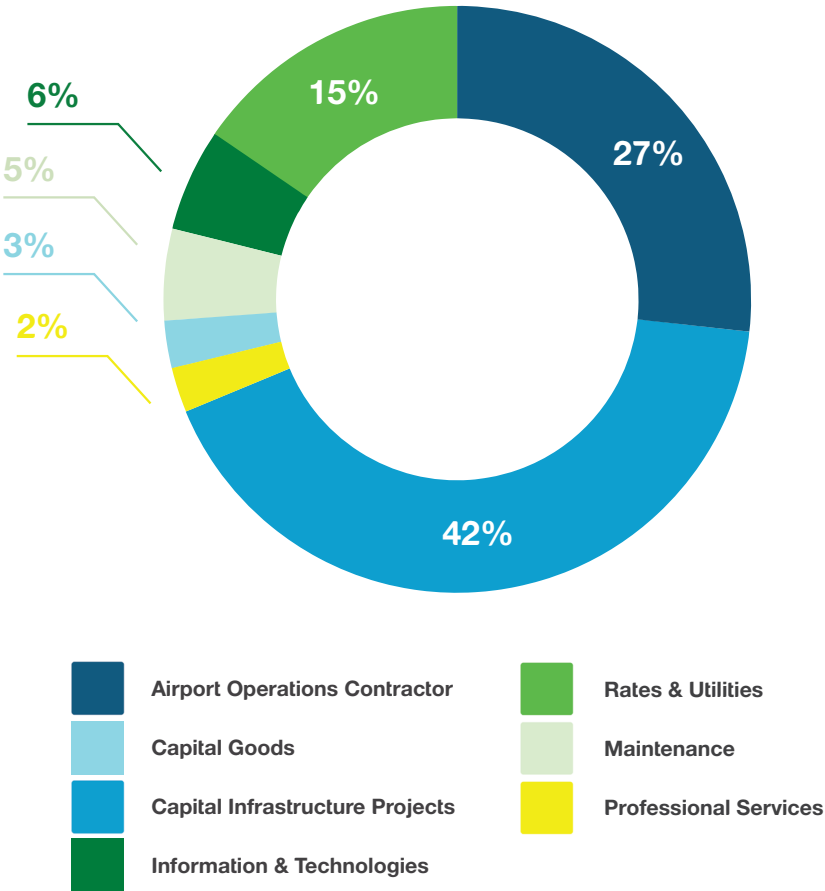
In reviewing our supply chain, we have adopted The United Nations Guiding Principles on Business and Human Rights, which recommends businesses to focus on assessing general areas of operations and supply chains where modern slavery risks are most significant. As a result, we prioritise these risks focusing 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 FY24, AAL spent \$184 million on goods and services from over 700 suppliers across various categories including Capital Construction & Property, Utilities, Airport Services, Consulting, IT Hardware and Software and 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, France, Germany, 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 FY24 were:

### Capital Infrastructure Projects

This includes Civil and Construction Contractor and Projects Consultants who 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 FY24 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.

### Capital Goods

This includes the procurement of our assets

### 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.

### Professional Services

This includes auditors, legal, banking, insurance and travel service providers.

### 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, lights, HVAC equipment etc.





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# Assessing our Modern Slavery Risk

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# 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.

Over 96 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

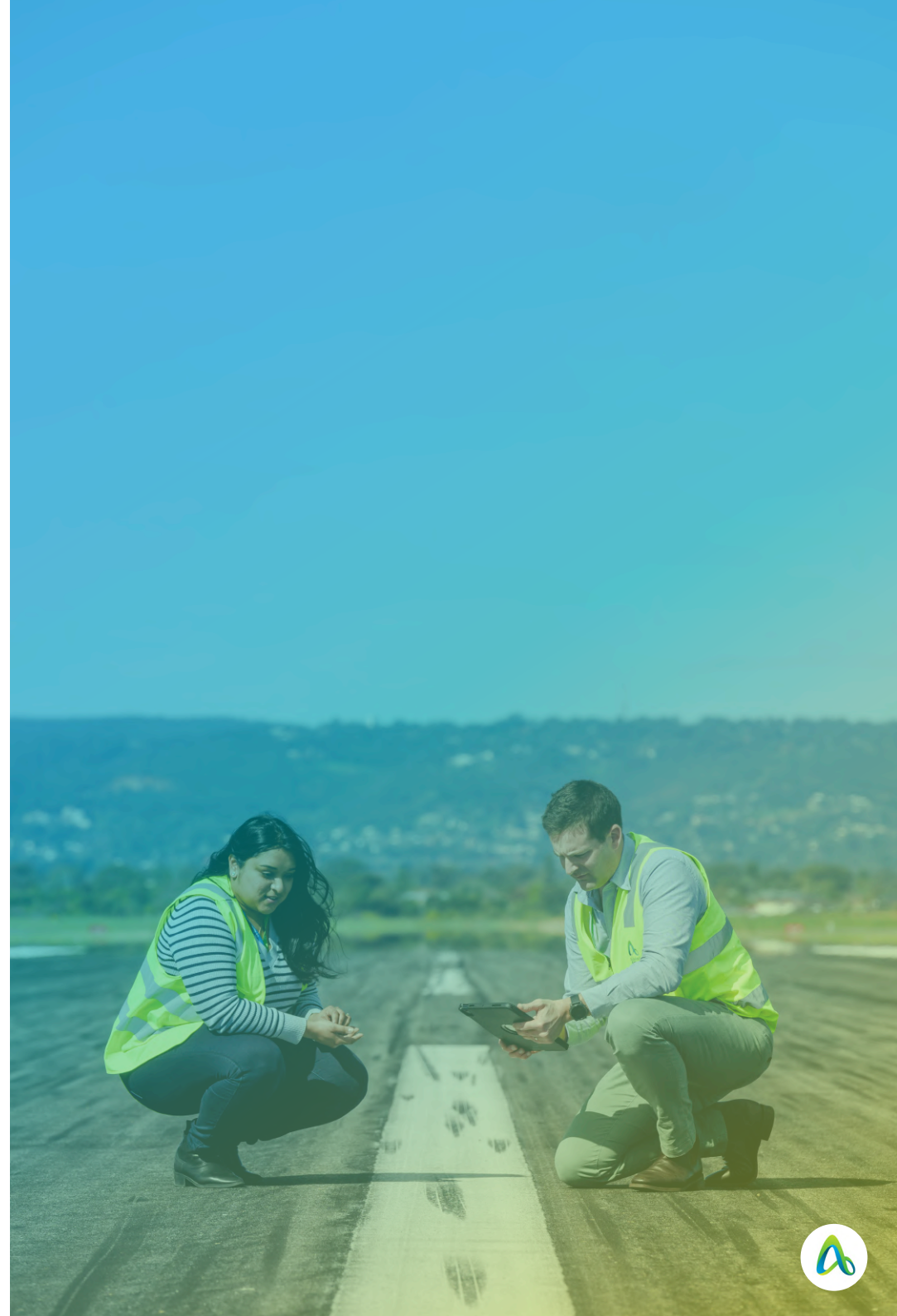
### Tier 3

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.





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# Addressing our Modern Slavery Risk

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# Policy Framework

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**Our governance framework is underpinned by policies that are reviewed every two years and approved by our Managing Director. This includes following Policy Framework that support the management of modern slavery risks in our business, communicates our human rights expectations and applies to 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 FY24, 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;
- 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

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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

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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 commercial airplane with red and black accents, positioned on a dark asphalt runway. The runway has white and yellow dashed lines. To the left of the runway is a grassy area. A large, abstract graphic overlay in shades of blue, green, and yellow curves across the left side of the image, partially obscuring the runway and grass. The graphic has a wavy, organic shape.

# Our Actions

In FY24 we continued to strengthen our governance and processes for managing modern slavery and human rights risks.

# FY24 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 was rolled out to our staff who manage contracts and/or procurements.
- Bullying and Harassment awareness workshop was rolled out organisation wide.
- We test our performance with internal customer experience surveys and staff wellbeing and engagement surveys.

## Governance & Policy

- We have launched an updated 'Fair Place of Work' e-learning module to keep our onboarding process current. This new version extensively covers topics related to Bullying, Harassment, Inclusion, and Belonging.
- The Procurement Procedure has been updated to mandate that sustainability and modern slavery considerations must be incorporated into all procurement activities.
- We reviewed and updated our Supplier Code of Conduct to include sustainability, commitment to supplier diversity and expansion on the labour and human rights compliance.
- We reviewed and updated our Procurement Policy to include Open, Fair and Effective Competition and Modern Slavery Regulations.
- AAL has committed to a Reflect RAP, assessed its sphere of influence, and developed initial action items. Significant progress has been made in FY24, and we are dedicated to achieving our set goals. This commitment will enhance our cultural awareness, boost the recruitment and engagement of Aboriginal and Torres Strait Islander talent, deepen our appreciation of customs, and celebrate important events together, ultimately making us a stronger and more inclusive company.

## Sustainability

- We have rolled out collaborative 'lunch-and-learn' sessions to the whole business, to empower each employee to bring their sustainability vision to life. These sessions will continue through FY25.
- We are prioritising elements of sustainable design and construction from project inception through to execution. As the scale of construction projects continues to grow, we are proud of our teams' initiatives to embed circular economy and sustainable design principles into their work.
- 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

- All AAL tenders require a mandatory Procurement Risk Assessment, which includes an evaluation of modern slavery risks.
- 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.

The Risk and Compliance business unit 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 FY25 we

- are planning to roll out Psychosocial Hazard Awareness program for all the AAL leaders.
- will continue to advance our commitment to upholding human rights throughout our operations and supply chain.
- are aiming for 100 per cent of our employees to complete AAL's modern slavery awareness training and whistleblower training.
- committed to align strategies and operations with the 10 principles of The UN Global Compact.
- are implementing Third Party Risk Management Framework which includes the consideration of Modern Slavery Risk.
- will develop a Procurement Strategy to support Indigenous owned businesses.



# Case Studies

## Heating Ventilation & Air Conditioning (HVAC) Tender



While tendering for HVAC 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

Understanding the minimum call-out rates for various times ensures that staff are paid appropriately, helping to mitigate risks related to modern slavery and anti-slave labour practices. AAL confirmed during post-tender clarification that the minimum duration for emergency call-outs is 4 hours.

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.

## Landscaping Project Tender



While conducting the Request for Tender process to select a landscaping contractor AAL assessed each tenderer's processes in managing modern slavery risks and ensuring compliance with the Act. After careful evaluation of the tender submissions, we prioritised suppliers who demonstrated robust practices and policies that align with our ethical and compliance requirements. The successful contractor was able to demonstrate stronger assurance regarding fair labour practices compared to competitors.

As part of the Tender process a comprehensive Risk Assessment was completed which included a Modern Slavery component. 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.

Additionally, the contract included clauses addressing Modern Slavery in relation to both the supplier's operations and their supply chain.



# Mandatory Reporting Criteria

	Modern Slavery Act 2018 (Cth) Criteria	Reference in this Statement	Page
1.	Identify the reporting entity and any entities the reporting entity owns or controls.	<a href="#">Our Company</a>	1-2
2.	Describe the reporting entity's structure, operations and supply chains.	<a href="#">Our Company Structure</a>	3
		<a href="#">Our Operations</a>	4
		<a href="#">Our Supply Chain</a>	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.	<a href="#">Assessing Our Modern Slavery Risks</a>	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.	<a href="#">Addressing Our Modern Slavery Risks</a>	15
		<a href="#">FY24 Actions</a>	22
5.	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	<a href="#">The Effectiveness of our Actions</a>	23
		<a href="#">Case Studies</a>	24
6.	Describe the process of consultation with any entities the reporting entity owns or controls.	<a href="#">Consultation</a>	26
7.	Other relevant information	<a href="#">Forward Vision</a>	24



# 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. It has been reviewed by our CFO and reviewed and endorsed by the Board and Managing Director.

Approved by the Board of Directors of Adelaide Airport Limited on 26.11.2024



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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