

Modern Slavery Company Policy

Purpose

Auckland Airport and its subsidiaries (collectively referred to as **Auckland Airport**) is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship by implementing processes to identify, assess, prevent and remedy human rights impacts across our business.

Modern Slavery is an umbrella term for several serious exploitative work practices that represent violations of human rights. Modern Slavery can take many forms and includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, deceptive or misleading recruitment for labour or services and debt bondage.

Background

The Australian *Modern Slavery Act 2018* (Cth) (**MSA**) took effect on 1 January 2019 and requires Auckland Airport to make an annual public report (**Modern Slavery Statement**) on the actions taken to identify, assess, and eliminate potential threats of modern slavery risks in its operations and supply chains.

Auckland Airport supports the protection of human rights and is guided by principles such as those in the United Nations (**UN**) Global Compact, the UN Universal Declaration of Human Rights, UN Convention of the Rights of the Child and the International Labour Organisation (**ILO**) Core Conventions.

Scope

This Modern Slavery Policy (**Policy**) applies to all persons working for or on behalf of Auckland Airport, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

Auckland Airport expects all who have, or seek to have, a business relationship with Auckland Airport to familiarise themselves with this Policy and to act in a way that is consistent with its values.

The principles of this Policy must be complied with or incorporated into all Auckland Airport policies. This Policy should be read in conjunction with Auckland Airport's Ethics and Code of Conduct Policy, Whistleblower Policy, Procurement Policy and Supplier Code of Conduct.

More broadly, this Policy is also consistent with Auckland Airport's overarching business strategy and sustainability strategy which is underpinned by four key pillars: Purpose, Community, People and Place.

Approved by the Board on November 2023

Application and Principles

Auckland Airport will not tolerate any form of modern slavery in its operations or supply chain. Each Auckland Airport business unit must:

- (a) adopt policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for the relevant business unit.
- (b) include in its operational and supplier contract terms, as far as practicable, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas to which they operate.
- (c) use in its operational and supplier contract terms, as far as practicable, requirements that suppliers:
 - a. Comply with the Auckland Airport Supplier Code of Conduct (copy attached as Appendix 1)
 - b. Confirm they have in place appropriate policies to manage risks of breaching modern slavery;
 - c. Provide the business unit with rights of termination if the supplier is unable or unwilling to work towards full compliance with the Auckland Airport Supplier Code of Conduct.

Protected Disclosures

Auckland Airport is committed to the principles and practices set out in the *Protected Disclosures (Protection of Whistleblowers) Act 2022*. If any employee learns of a breach or suspects a breach of this Policy, they should report that in accordance with the Whistleblower Policy.

Breaches of Policy and Reporting

Any concerns regarding potential conduct involving modern slavery should be reported to the Chief Corporate Services Officer.

All suspected breaches will be investigated and appropriate disciplinary and remedial action taken. Employees who do not strictly comply with this policy may face disciplinary action, which may include termination of employment.

Training

To ensure a widespread understanding of its obligations and ethical standards, Auckland Airport actively tracks its modern slavery training to ensure, employees, contractors and consultants undertaking procurement activities have the requisite modern slavery risk awareness to be undertaking any business with suppliers. Auckland Airport provides modern slavery training and materials to key employees involved in procurement activities.

References

Modern Slavery Act 2018 (Cth)
Ethics and Code of Conduct Policy
Procurement Policy
Supplier Code of Conduct
Whistleblower Policy
Protected Disclosures (Protection of Whistleblowers) Act 2022
Risk Management Policy
Sustainability Policy

Approved by the Board on November 2023

Next Review

This Policy will be reviewed by the Board on an annual basis. This Policy reflects Auckland Airport's current practice and will be updated accordingly to ensure that it remains effective and meets the best practice standards and Auckland Airport's needs.

Approved by the Board on November 2023

Supplier Code of Conduct

Introduction

Auckland International Airport Limited (“Auckland Airport”) and its related companies are committed to operating responsibly - to be a good neighbour to the community in which we operate and to play our part in protecting and enhancing the natural environment. We’re a successful business and we want to help other people, organisations and businesses succeed too.

We have a clear and ambitious corporate social responsibility strategy - we want to significantly increase our focus on activities that create ‘shared value’ - and as a supplier and business partner to Auckland Airport you are contributing directly to our goal of shared value.

The standards maintained by Auckland Airport are critical to delivering our vision of being a great New Zealand business recognised as a world leader in creating value from modern airports. These standards include the commitment that we will act ethically by engaging in sound practices, respecting others and accepting responsibility for our behaviour. All suppliers need to be aware of these standards and the conduct required of them.

This Supplier Code of Conduct (“Code”) details our expectations of all suppliers providing products and services to Auckland Airport. Suppliers are expected to be aware of and comply with this Code, as well as all other relevant policies of Auckland Airport and relevant obligations set out in legislation. Suppliers are responsible for communicating this Code to their employees, their suppliers and taking action to address non-compliance.

Labour and Human Rights

Auckland Airport expects all suppliers to treat their employees fairly, with dignity and respect, and to maintain the highest levels of professionalism, honesty and personal integrity in all actions.

Auckland Airport supports the protection of human rights and is guided by principles such as those in the UN Global Compact, the United Nations Universal Declaration of Human Rights, UN Convention of the Rights of the Child and the International Labour Organisation (ILO) Core Conventions.

Suppliers shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices.

All suppliers shall ensure that all work is voluntary and will not traffic persons or use any form of slave, forced, bonded, indentured, or prison labour. Suppliers will adhere to New Zealand law, the International Labour Organization conventions (ILO) and The Human Rights Act 1993.

Working Conditions, Wages and Freedom of Association.

Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest, and shall meet all legal requirements relating to wages and benefits. Suppliers shall freely allow workers’ lawful rights to associate with others, form and join (or refrain from joining) organisations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.

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Health Safety & Wellbeing

Health, safety and well-being is important to Auckland Airport, so it expects suppliers to comply with workplace health and safety laws and regulations, maintain healthy and safe work environments and when relevant, living conditions.

Suppliers shall maintain appropriate health & safety processes that comply with all its obligations under the Health and Safety at Work Act 2015 and all other relevant workplace legislation, regulations and guidance issued by the regulator; and comply with Auckland Airport's instructions.

Environment

We are proud of our location on the Manukau harbour. Suppliers are expected to align with Auckland Airport's Environmental Management plan when developing their own environmental policy¹.

Suppliers are expected to operate in a manner that actively manages risk, conserves natural resources and protects the environment within the airport. These include areas of focus such as: economic contribution, community and Iwi engagement, smart design and construction, customer experience, work location of choice, safety and security, ground transport, noise and emissions, energy and carbon, waste and water.

Ethics

The standards maintained by our suppliers are critical to delivering our vision of being a great New Zealand business. These standards include the commitment that suppliers will act ethically by engaging in sound practices, respecting others and accepting responsibility for their behaviour. Suppliers are expected to foster an inclusive culture in which diversity is valued and providing a workplace that is free from harassment and discrimination.

Suppliers shall not engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage.

Protection of Intellectual Property

Suppliers must respect Auckland Airport's Intellectual Property rights by complying with all legal and contractual requirements.

Whistle-blower Protection and Anonymous Complaints

Auckland Airport is committed to the principles and practices set out in the Protected Disclosures (Protection of Whistleblowers) Act 2022 so suppliers are expected to ensure employees who wish to disclose any serious wrongdoing may do so in accordance with the act and be protected from any civil or criminal liability in respect of the disclosure or any retaliation or victimisation as detailed in the Human Rights Act 1993.

Community Engagement

Auckland Airport is committed to being a good neighbour in our community. As a supplier to Auckland Airport and part of our community, suppliers are encouraged to be leaders and empower people within our community through education, sustainable employment and protecting the natural environment.

¹ For information regarding our Environment Management plan click here: <https://corporate.aucklandairport.co.nz/corporate-responsibility/environment>

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Risk Assessment, Management and Audits

Suppliers are expected to take responsibility for designing and implementing risk management and internal compliance and control systems which identify the material risks when providing goods and services to Auckland Airport, and for promoting and monitoring the culture of risk management within their business and compliance with internal risk systems and processes.

Suppliers are expected to maintain appropriate documents and records to ensure regulatory compliance and have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

Supply Chain

Auckland Airport recognises that the operation and conduct of its suppliers can affect the longevity, reputation and integrity of our business and have impacts upon the wider community of stakeholders. Therefore, suppliers are expected to, at a minimum:

- Apply and extend similar principles to those summarised in this Code to the management of their supply chain; and
- Ensure any subcontractors they engage to work at Sydney Airport understand and are familiar with this Code.

Monitoring compliance with our Supplier Code of Conduct

The group that Auckland Airport collectively calls “suppliers” includes suppliers, subcontractors, service providers, professional service providers, consultants, intermediaries and agents. Suppliers must ensure that the practices and principles outlined in Auckland Airport’s Code flow throughout their own supply chains.

Auckland Airport reserves the right to monitor and audit each supplier’s compliance with the Code and it is expected that suppliers will cooperate by providing relevant information that Auckland Airport requests, and by making individuals accessible so Auckland Airport can conduct a meaningful audit.

Similarly, suppliers are required to evaluate their supply chains to ensure compliance with this Code and to conduct audits of their supply chains when requested by Auckland Airport, with any non-compliance by suppliers or members of their supply chain being effectively remediated both in a timely manner and at no additional cost to Auckland Airport or its customers.

Breaches of the Code may negatively impact supplier’s business relationship with Auckland Airport and may include (but not be limited to) contract termination.

This Code draws from industry and internationally accepted principles such as the Responsible Business Alliance (RBA) formerly known as the Electronic Industry Code of Conduct (EICC), Ethical Trading Initiative, International Labour Organization’s (ILO) International Labour Standards, United Nations Guiding Principles on Business and Human Rights, Social Accountability International, SA 8000, the ILO’s Code of Practice in Safety and Health, National Fire Protection Association, Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and OHSAS 18001.

This Code is not intended to create new or additional rights for any third party.

Related Legislation

Protected Disclosures (Protection of Whistleblowers Act (2022)

Privacy Act (2020)

Human Rights Act (1993)

Health and Safety at Work Act (2015)

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