

Modern Slavery Company Policy

Purpose

Auckland Airport and its subsidiaries (collectively referred to as **Auckland Airport**) is committed to limiting the risk of modern slavery¹ occurring within its own business, infiltrating its supply chains or through any other business relationship.

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 of its business to address 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 Corporate Responsibility Policy, which seeks to implement a proactive corporate responsibility strategy that meets both stakeholder and community expectations in material areas such as sustainability, community engagement and safety and security.

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:

¹ Modern Slavery is an umbrella term for several serious exploitative work practices that represent violations of human rights. Modern Slavery can take many forms, the MSA's main classifications include; 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.

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- (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. 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 Act 2000*. 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 General Counsel (currently, Mary-Liz Tuck).

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 will actively track its modern slavery training to ensure, as a priority, employees, contractors and consultants undertaking procurement activities have the requisite modern slavery risk awareness to be undertaking any business with suppliers. Auckland Airport expects to expand the group of people undertaking modern slavery training across the business.

References

Modern Slavery Act 2018 (Cth)
Ethics and Code of Conduct Policy
Procurement Policy
Supplier Code of Conduct
Whistleblower Policy
Protected Disclosures Act 2000
Risk Management Policy
Corporate Responsibility Company Policy

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.

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Supplier Code of Conduct

Purpose

Auckland International Airport Limited (“**Auckland Airport**”) and its related companies are committed to operating in a responsible and sustainable manner. We want to make sure we create environmental, social, cultural and wider economic value as part of ongoing business activity.

Our suppliers are an essential part of our business, providing the goods and services needed to run our operations. We seek to work with suppliers that share our commitment to customers, communities and the environment, whilst ensuring an inclusive, fair, safe, responsible and sustainable approach to business.

This Supplier Code of Conduct (“**Code**”) details our ambition for 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 and procedures of Auckland Airport and relevant obligations set out in legislation.

Scope

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.

Suppliers are responsible for communicating this Code to their employees, their suppliers and taking action to address non-compliance.

Standards

1. Human Rights and Working Conditions

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. Modern slavery is a key human rights risk, both in operations and supply chains. Auckland Airport is committed to ensuring it is not doing business with individuals or companies who knowingly profit from modern slavery. At a minimum, suppliers must:

- Treat their employees fairly, with dignity and respect, and maintain the highest levels of professionalism, honesty and personal integrity in all actions;
- Not discriminate against any worker based on age, disability, ethnicity, gender, marital status, pregnancy, 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;
- Ensure that all work is voluntary and will not traffic persons or use any form of slave, forced, bonded, indentured, child labour or prison labour;

- Conduct their activities in a manner that respects human rights and complies with all relevant laws and regulations in relation to employment practices, human rights, discrimination, harassment and bullying, including but not limited to the Australian Modern Slavery Act 2018 (Cth), the International Labour Organisation conventions (ILO) and The Human Rights Act 1993;
- 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;
- Pay workers lawful wages, including equal pay for equal work;
- Ensure employees who wish to disclose any serious wrongdoing may do so in accordance with the Protected Disclosures Act 2000 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;
- Provide employees with the appropriate level of training to perform their role and to comply with this Code;
- 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;
- Promote and maintain a workplace that is free from bullying, harassment and discrimination; and
- Ensure no form of physical, sexual, psychological or verbal harassment or abuse of any kind is tolerated within their organisation.

2. Ethical Business

The standards maintained by our suppliers are critical to delivering our vision of being a responsible and ethical New Zealand business. Suppliers must:

- Act ethically by engaging in sound practices, respecting others and accepting responsibility for their behaviour;
- Foster an inclusive culture in which diversity is valued and is free from harassment and discrimination;
- Not engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage;
- Respect Auckland Airport's Intellectual Property rights by complying with all legal and contractual requirements;
- Disclose any actual, perceived or potential conflict of interest to Auckland Airport, including any employee or contractor of Auckland Airport who may have a financial or other interest of any kind in the supplier's business; and
- Maintain transparent and accurate financial and business records to demonstrate compliance with applicable laws and regulations as well as generally accepted accounting standards.

3. Health and Safety

Health, safety and wellbeing are important to Auckland Airport. We expect our suppliers to:

- Provide healthy and safe work environments and, when relevant, living conditions;
- Maintain appropriate health and 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;
- Maintain a health and safety policy that is freely available to all staff and provide employees and contractors with appropriate workplace health and safety training; and
- Provide evidence of compliance with Auckland Airport's health and safety practices upon request.

4. Environmental Management

We are proud of our location on the Manukau harbour. We are committed to minimising our impact on the natural environment, and therefore expect our suppliers to:

- Comply with relevant legislation and environmental approvals, including Auckland Airport's resource consents;
- Be aware of and practice good biosecurity risk management and comply with any biosecurity obligations relating to Auckland Airport being a place of first arrival, including the Biosecurity Act 1993 and the Health Act 1956;
- Maximise the efficient use of energy, water and raw materials;
- Conduct activities in such a way that will minimise impact on the environment, for example through management of waste disposal, air emissions and pollution;
- Seek to reduce negative impacts on the environment through selection of sustainable products; and
- Be able to demonstrate how greenhouse gas emissions associated with their direct business activity are managed and offer low carbon options in response to Auckland Airport's procurement requests.

5. Local Impact

Auckland Airport is committed to being a good neighbour in our community. We encourage our suppliers to be leaders and empower people within our community through education and sustainable employment. At a minimum, suppliers must:

- Interact with communities in a way that respects and values their diversity;
- Operate in a way that supports the social and economic wellbeing and resilience to the South Auckland community now and into the future;
- Work collaboratively with suppliers, partners, customers and communities to deliver better outcomes; and
- Consider procuring goods and services from local businesses as well as staff from the communities in close proximity to Auckland Airport wherever possible.

Auckland Airport offer a jobs and skills hub for local people, 'Ara'. We prefer our suppliers to use the free professional recruitment and up-skilling service to help make a difference in the local community. To find out more about Ara, visit <https://www.araskills.org.nz/>

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. Supplier should also promote the practice of risk management within their business and monitor 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.

Auckland Airport reserves the right to monitor and audit each supplier's compliance with this 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 Act (2000)

Privacy Act (1993)

Human Rights Act (1993)

Health and Safety at Work Act (2015)

Modern Slavery Act Australia (2018)

Biosecurity Act (1993)

Health Act (1956)