

Modern Slavery Statement CY 2025

SYD

About this report

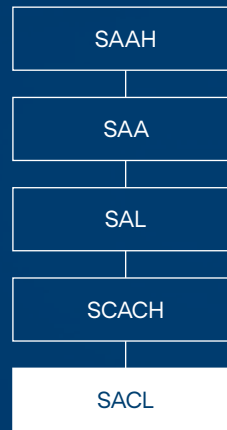
This Sydney Airport Modern Slavery statement covers activities undertaken during the year ending 31 December 2025 and as in previous reporting periods, this is a joint statement by each reporting entity under the *Modern Slavery Act 2018 (Cth)*.

Sydney Airport Structure

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

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

In this statement, the expressions "we", "our", "SYD" and "Sydney Airport" refer to SAAH and the entities it owns or controls, unless otherwise stated.



- Non-operating entity
- Operating entity

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Acknowledgement of Country

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

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

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



A message from our

Chair and CEO



David Gonski, Chair | Scott Charlton, CEO

Sydney Airport sits at the heart of Australia's aviation network and plays a central role in connecting people, goods and services across the country and the world. As passenger volumes continued to grow in 2025, reaching 42.53 million, so too has our ongoing responsibility to operate safely, responsibly and with integrity. This includes maintaining a firm commitment to ethical business practices and protecting human rights by addressing modern slavery risks across our operations and supply chain.

This Modern Slavery Statement outlines the steps SYD is taking to identify, manage and mitigate modern slavery risks. We acknowledge the complex risks within the aviation sector, from diverse supply chains to services delivered by third-party providers, and we remain committed to addressing these risks through enhanced due diligence, improved data integrity, and continuous improvement.

Key 2025 initiatives include:

Strengthened supply chain due diligence

Building on the modern slavery risk mapping undertaken by external human rights advisory firm Pillar Two in December 2024, we continued to embed modern slavery risk indicators into our procurement and supplier management processes in 2025. Our expanded supplier profiling and assurance program, supported by new technology platforms, has improved transparency across key procurement categories, and strengthened our ability to act where risks may be present. While these foundations were established in 2025, the value of this enhanced transparency and compliance framework will continue to grow, with 2026 expected to deliver deeper insights and stronger oversight of supplier-related modern slavery risks.

Expansion of airport-led human trafficking campaign

As reported in the previous reporting period, our partnerships with A21, the Australian Federal Police (AFP) and Melbourne Airport continued and expanded in 2025, with Perth Airport joining the "Can You See Me?" campaign, extending its reach from the east to the west coast. Throughout November, high-traffic digital screens across terminals in all three major airports displayed targeted human trafficking messages, reaching more than 8.5 million travelers, helping them recognise and report signs of exploitation. This coordinated, nationwide effort demonstrates the impact of Australia's major gateways working together to help protect vulnerable people. The 2025 campaign also broadened its focus to include messaging on forced marriage, child exploitation and online exploitation, reflecting emerging trends identified by the AFP and representing a progression of the initiative reported last period.

Modern slavery training – Third party security staff

In 2025, A21 with the support of SYD, assisted our third-party security contractor, to develop and implement airport-specific modern slavery and human trafficking training into their induction and ongoing learning programs. Approximately 1,100 third-party security screening officers completed this training, strengthening frontline capability at every terminal, providing an important additional layer of support alongside Australian Border Force (ABF) officers at T1 international terminal, and a critical first line of protection in our T2 and T3 domestic terminals.

SYD remains committed to identifying, addressing and mitigating modern slavery risks. SYD continues to enhance the systems and processes that support our human rights responsibilities.

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

David Gonski

Chair, Sydney Aviation Alliance Holdings Pty Ltd

Scott Charlton

Chief Executive Officer, Sydney Airport

SYD's operations, structure and supply chain

Operations

Sydney Airport (SYD) is Australia's largest domestic and international gateway, directly connecting Sydney to an extensive network of over 105 destinations across the country and the world.

Sydney Airport is a vital infrastructure asset that generates more than \$45.3 billion in economic activity every year for NSW and Australia, and plays a central role in supporting Australia's transport network and global trade, generating and facilitating more than 35,500 jobs at the airport and 354,800 full-time equivalent jobs across NSW and Australia, representing 1.5 percent of Australia's GDP and 3.0 percent of national employment.

In 2025, 42.53 million passengers travelled through Sydney Airport domestic and international terminals, with over 320,000 aircraft passing through our airport, including almost 13,000 freight movements.

SYD workforce





For this reporting period, SYD directly employed approximately 800 people, with over 90 percent of the workforce in permanent full-time and part-time roles.

SYD has a small number of apprentices who are indirect employees (<1 percent), employed by a third-party specialist apprenticeship and trainee supplier, supporting SYD's apprenticeship program.

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

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






SYD operations and revenue streams

 Aeronautical services for passengers, freight and aircraft movements.	 Property and Car Rental with a real estate portfolio that includes hotels and freight facilities.	 Retail with retail and food and beverage stores across three terminals and advertising sites.	 Parking and Ground Transport including car parks and facilitation of access to and from the airport.
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Our purpose and values

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

Our values define the behaviours we must embody collectively to achieve our purpose. We expect our suppliers to share our values. Our expectations are set out in the Supplier Code of Conduct, which defines required standards for supplier conduct. Suppliers must review and comply with the Code throughout their supply chain, including subcontractors. Procurement decisions are informed by a supplier's ability to meet or exceed the requirements of the Code.

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

In 2025, SYD worked with 1,002 suppliers, with the annual spend distributed between 58 percent in Capital Expenditure (CAPEX) and 42 percent in Operational Expenditure (OPEX).

The table below summarises SYD's direct supplier footprint by country. It shows the number of direct suppliers, percentage of annual spend, and the main categories of goods and services purchased. This snapshot helps explain where our spend sits geographically so we can focus on our risk assessment priorities.

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

Suppliers undertaking significant capital works projects are typically engaged as contractors, either on a long or short-term basis, depending on the nature of the contracted service.

A large majority of suppliers directly contracted by SYD are based in Australia and make up more than 97 percent of the total spend for 2025. Examples of typical overseas spend include technical / specialist consultants, corporate support services and technology hardware, all overseen and managed via SYD's supply chain processes.

SYD is committed to operating ethically, fairly, and in compliance with all relevant laws while maintaining a socially responsible approach that aligns with the expectations of our local communities.

Country	Number of suppliers ¹	Percentage of annual spend	Supplier categories
Australia	911	97.32%	IT Hardware, Software & Maintenance, Consultants, Corporate Services, Asphaltting, Construction Services, Materials & Equipment, Events & Marketing, Recruitment & Labour, Security Services, Airport Equipment & Services, Baggage Handling Services, Cleaning Services, Carpark Management, Landscaping, Uniforms & Protective Clothing, Fleet leasing, Utilities, Office Equipment, Courier Services, Waste, Fuels & Oils
Belgium	1	0.001%	Airfield Lighting & Corporate Services
Canada	4	0.019%	IT Software & Maintenance, Consultants, Events & Marketing
China	2	0.264%	Consultants, Vehicles, Events & Marketing
Denmark	1	0.020%	IT Software & Maintenance, Baggage Handling Services, Subscriptions
Estonia	1	0.038%	Consultants
France	2	0.005%	IT Software & Maintenance, Carpark Management, Events & Marketing
Germany	4	0.009%	IT Software & Maintenance, Consultants, Carpark Management
Greece	1	0.003%	Consultants
Hong Kong	2	0.004%	Consultants, Events & Marketing
Iceland	1	0.008%	IT Software & Maintenance
India	1	0.001%	IT Software & Maintenance
Ireland	4	0.308%	IT Support, Consultants, Recruitment & Labour, Events & Marketing
Isle of Man	1	0.019%	Consultants, Events & Marketing
Netherlands	2	0.024%	IT Software & Maintenance, Labour Hire, Security Services, Baggage Handling Services, IT hardware
New Zealand	7	1.076%	Consultants, Legal Services, Events & Marketing, IT Software & Maintenance
Romania	1	0.013%	Consultants
Singapore	4	0.032%	Recruitment & Labour, Consultants, Corporate Services, IT Software & Maintenance, Events & Marketing
Switzerland	4	0.074%	Consultants, IT Software & Hardware, Corporate Services
United Kingdom	19	0.476%	IT Software & Hardware, Consultants, Carpark Management, Baggage Handling Services, Events & Marketing, Corporate Services
United States	28	0.272%	IT Software & Hardware, Consultants, Corporate Services, Events & Marketing, Construction works
Vietnam	1	0.013%	Events & Marketing

1. Deeper-tier suppliers engaged by our direct suppliers are not included.

Description of the risks of modern slavery

Understanding and identifying modern slavery risks

Guided by the UN Guiding Principles on Business and Human Rights (UNGPs), SYD assesses modern slavery risks by considering whether we could cause, contribute to, or be directly linked to harm. This lens informs how we respond and remediate where risks exist such as:

- Where the organisation's own acts or omissions directly result in modern slavery occurring (for example, if it engages young or vulnerable people in hazardous work)
- Where the organisation's own acts or omissions are significant in facilitating, encouraging or enabling another party to cause a situation of modern slavery (for example, if its purchasing practices puts significant cost and time pressures on suppliers that can only be met through the use of forced labour)
- Where the organisation may be directly linked to modern slavery by its operations, products or services through a business relationship (for example, if a product it purchases was manufactured using workers in debt bondage).

SYD's Enterprise Risk Management Framework and Risk Management Policy also provides guidance and support to SYD internal business units and stakeholders to assist in the management of modern slavery risk practices.

Identification of the risk of modern slavery risk and supply chain risk mapping

Supply chain

In 2024, SYD engaged Pillar Two to assist with the identification of modern slavery risks in SYD's supply chain. Pillar Two conducted risk mapping using its UNGP-aligned methodology (based on the severity of risk to people (scale, scope and irremediability)) to identify key modern slavery risk areas across SYD's supply chain. It identified ten key categories of goods or services with heightened risks of modern slavery and the potential involvement of Sydney Airport in each risk category. For this reporting period, SYD used this risk mapping work to prioritise the reassessment of SYD's suppliers.

SYD has a diverse supply chain. Most direct suppliers are located in Australia, but our higher modern-slavery exposure sits within our deeper-tiered suppliers, where visibility is lower and where raw materials or components may come from higher-risk countries. We see the most salient risks in two areas:

- **Third-party services.** Use of outsourced services may involve modern slavery risk among service providers and their subcontractors. These services are higher risk because they often rely on subcontracting and labour-hire, reducing transparency over deeper-tier suppliers. These include construction labour on works packages, facilities services and management (such as terminal and airside cleaning, security, and kerbside management), and labour-hire. Risk can also arise where offshore vendors deliver IT services and payroll functions.
- **Procuring certain goods and equipment.** The procurement of certain goods and equipment presents modern slavery risks within the supply chain. SYD procures construction and building materials, ICT hardware, and uniforms/PPE. These categories may present heightened modern slavery risk due to sector characteristics, inputs from higher risk geographies, and labour and recruitment practices in manufacturing locations, particularly in deeper tiers of the supply chain where we have less visibility.





Operations

Human trafficking

Human trafficking is a modern slavery risk within the airport environment, where vulnerable individuals may be exploited during transit. SYD cooperates with and supports relevant authorities, including the Australian Border Force (ABF), within the Department of Home Affairs, which has primary responsibility for mitigating this risk through the National Action Plan to Combat Modern Slavery 2020-25.

In 2025, SYD maintained its partnership with Melbourne Airport for a second year to run an Australian airport-specific human trafficking awareness campaign with digital screens activated in key high traffic areas including check-in counters, gates and baggage carousels at Sydney Airport's domestic and international terminals. In 2025, the campaign expanded to include Perth Airport, providing even wider communication and awareness across inbound and outbound passenger movements in Australia.

SYD's security contractor delivers human trafficking awareness training as part of its airport induction and ongoing training. Approximately 1,100 security workers received training in 2025, with annual refreshers. The training covers recognition indicators of exploitation and the steps for escalation.

Workforce

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

To control and mitigate risk within our workforce, SYD maintains a policy framework, accessible grievance mechanisms, and comprehensive training programs for our permanent and contracted people.

In December 2025, with the support of A21 and Pillar Two, SYD conducted Modern Slavery Awareness training, capturing over 130 SYD employees, directly responsible for engaging and managing suppliers. This training included information on Human Trafficking risks at Sydney Airport and refreshed awareness of the 10 key modern slavery risk categories identified through the Pillar Two work in 2024.

For indirectly employed individuals, SYD collaborates with its contractors to assess and understand existing controls to manage risks. Current measures include communicating our sustainability and human rights expectations through contractual requirements, oversight of a supplier's organisational risk and promoting awareness of relevant complaint mechanisms, including the Whistleblower hotline.

Actions implemented to manage and oversee modern slavery risk

The overall framework for managing modern slavery risk has not materially changed from earlier reporting periods. Highlights for this reporting period included – introduction of an external technology partner to support supplier compliance oversight, and onboarding. We also expanded training and a member of the Procurement team joined the UN Global Compact Network Australia collaborative working group.

Policy framework

As noted in previous reporting periods, SYD has established policies, procedures, and codes of conduct to uphold and protect human rights, outlining expectations for directors, employees, contractors, and consultants.

Code of Conduct	The SYD internal Code of Conduct sets the standard for how we work together to operate the airport in a safe, responsible and secure manner. It reinforces SYD's commitment to respect, upholding human rights and rejects all forms of slavery. Employees of SYD receive training in relation to their obligations under the Code of Conduct. This includes mandatory induction and annual refresher training regarding key principles of the Code.
Supplier Code of Conduct	The SYD external Supplier Code of Conduct establishes the minimum standards of behaviour and conduct expected of SYD's suppliers across Safety and Wellbeing, Labour Practices and Human Rights, Diversity and Inclusion, Governance and Compliance, Privacy and Cyber Security, Environmental Management, and Community. The code also encourages suppliers to raise human rights or modern slavery related concerns using SYD's anonymous whistleblower hotline. The code is publicly available via the website, through our external supplier portal. We require Suppliers to review and comply with our Supplier Code of Conduct. Suppliers must make sure their sub-contractors and broader supply chain understand and are familiar with the Code. We are also committed to working proactively with suppliers to align with expectations to the Code.
Fraud and Corruption Prevention Policy	The Fraud and Corruption Prevention Policy outlines our commitment to high standards of ethical conduct and to supporting a culture of ethical behaviour. SYD has no tolerance for fraud, bribery or corruption in any part of our business.
Human Rights Policy	The Human Rights Policy details our commitment to respect and support human rights, including rejection of any form of slavery such as forced and child labour. This policy guides our engagement with suppliers in respect of their human rights practices. We review our Human Rights Policy every two years and update it as required.
Risk Management Policy	The Risk Management Policy identifies roles and responsibilities for risk management and the steps followed to identify, analyse, accept or mitigate risk.
Compliance Management Policy	The Compliance Management Policy details our commitment to a strong culture of compliance and ethical behaviour.
Sustainability Policy	The Sustainability Policy sets our commitment to responsible growth that delivers positive outcomes for our stakeholders, and to respect human rights.
Whistleblower Policy	The Whistleblower Policy and associated program allows employees, contractors and suppliers to raise concerns about known or suspected unlawful, unethical or irresponsible behaviour, including human rights and modern slavery concerns in a confidential manner. Directors and senior management receive training periodically on the process for handling whistleblower complaints they may receive directly and the process for escalation.

Legal – contracts and modern slavery clauses

SYD is committed to managing modern slavery risks across our operations and supply chain. Many of our agreements with airlines, fuel suppliers, operators, tenants and other contracting parties include clauses requiring them to identify and address these risks and to comply with the *Modern Slavery Act 2018* (Cth). These clauses are included in many of our existing agreements, and SYD is progressively incorporating them into new and renewed agreements.

Airport operating licence

Many operational activities at the airport are performed by companies that fall outside of SYD's direct operational control. These activities are performed by ground handling agents, aircraft refueling companies, cargo terminal operators, catering, cabin cleaning and aircraft maintenance providers.

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

A refreshed AOL was issued in 2025, which includes various compliance monitoring activities, including modern slavery obligations. This refreshed version is being progressively rolled out to companies, with all major ground handlers signed in 2025.

Relevant licence holders must notify SYD of:

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

During 2025, there were no reports of modern slavery across SYD's AOL holders.

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

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

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

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

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

Whistleblower reporting process

People wanting to escalate a concern about modern slavery at Sydney Airport, or our Supply Chain can do so via our whistleblower hotline, which is accessible 24/7.

Issues or concerns can also be reported to authorised people within the business including Directors, the Group Executive – Government Relations, Sustainability & Legal, the Group Executive – People & Corporate Affairs (Whistleblower Protection Officer) and members of the Executive Leadership team.

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

In 2025, a campaign was undertaken to raise awareness amongst airport stakeholders in relation to SYD's Whistleblower hotline, to provide precinct workers with access to this anonymous service if they suspect any wrongdoing. The awareness poster was also added to SYD laptops and desktop screen savers and displayed on larger screens in key shared meeting areas.

Modern slavery working group

One way SYD manages modern slavery risks across its operations and supply chain is through the Modern Slavery Working Group. This Group has cross functional members from several key SYD business units including Risk & Compliance, Legal, Finance, Procurement, Planning & Delivery, Commercial, Aviation, Sustainability and Corporate Affairs and is responsible for developing and delivering the annual program of work focusing on 5 areas: risk assessment, training, due diligence, remediation and reporting.

The program is underpinned with reference to SYD's Human Rights Policy developed with reference to the UN Guiding Principles on Business and Human Rights and other international standards.

Consistent with previous reporting period, our Modern Slavery Working Group continues to meet quarterly to monitor regulatory and legislative trends and announcements, assessing effectiveness of SYD's existing initiatives and exploring approaches to strengthen our response to modern slavery risks.

Modern slavery governance

Effective modern slavery governance strengthens our organisation's ethical foundations, reduces regulatory and supply chain risk, and enhances stakeholder (internal and external) trust. SYD's governance approach aims to establish clear accountability, and embed oversight and transparent reporting, across our procurement practices.

This structure assists SYD in protecting vulnerable workers, supporting responsible suppliers, and upholding our commitment to sustainable and ethical business operations. Key forums within this structure are:



Modern Slavery Response Procedure

The SYD Modern Slavery Response Procedure outlines the escalation process when a potential modern slavery risk is suspected or identified in our operations, supply chain or value chain.

This procedure includes the following steps:

1. **Identification of the issue:** The grievance must be identified as a modern slavery issue, which may include forced labour, human trafficking, or unlawful wage with-holding.
2. **Reporting:** Individuals can report the issue through designated channels, which may include internal reporting systems, third-party organisations, or legal channels.
3. **Investigation:** The grievance will be investigated to determine the nature and extent of the issue.
4. **Remediation:** If the grievance is confirmed, remediation steps will be taken to address the issue and protect the affected individuals where possible.
5. **Follow-up:** The grievance process will include follow-up actions until the issue is resolved, and affected individuals are supported. It is essential for the organisation to have clear and accessible grievance procedures to respect the rights of all individuals and provide a clear pathway for resolution.

SYD has undertaken a review of the Modern Slavery Response Procedure in alignment with its continuous improvement programs to retain a fit for purpose process, aligned with SYD's regulatory obligations. No amendments to the procedure were identified in 2025, and the procedure will continue to be monitored for its effectiveness in 2026.

Prequalification and ongoing compliance monitoring

In 2025, SYD introduced an external technology partner to assist in the management and oversight of supplier governance and compliance. This platform includes a supplier profiling assessment. Supplier responses assist SYD with the identification of modern slavery risk in its supply chain.

Applying a risk-based approach, initial prequalification profiling commenced in September 2025, to qualify SYD's high risk suppliers. At the end of December 2025, SYD had registered and assessed over 200 applicable SYD 'high risk' suppliers, including organisational risk. Profiling of our supply chain will continue in 2026 with visibility of supplier compliance in 'real time' and re-profiling undertaken annually.

SYD access cards

A Sydney Airport security access card is required for any person working at the airport who requires access to the terminals or airfield. A key element of this process is confirming a person's identity and their right to work in Australia.

- SYD issued Aviation Security Identification Cards (ASICs)

Airport workers are required to confirm their identity with evidence in person at the SYD ID and Access Services Centre to obtain an access card relevant to the nature of their work at the airport or for SYD. As a part of the application process, government-issued photo identification is required, and documents are checked by the SYD team using the Australian Government's Visa Entitlement Verification Online system. This confirms the applicant's right to work in Australia. Applications are also reviewed and approved by the Department of Home Affairs.

Identity check processes for SYD-issued access cards were strengthened in 2019. Where an applicant for all levels of access has lived overseas for more than six months in the past five years, they are required to supply a police check from the country where they resided, in addition to standard Australian government requirements.

Landside Terminal Cards are issued to anyone working at the airport that does not require access to restricted areas (i.e. airside beyond security checkpoint) and require government-issued photo identification.

- Third party issued Aviation Security Identification Cards (ASICs)

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

These access and identity controls are not designed to detect modern slavery or assess working conditions. Collectively, they support workforce visibility and traceability by confirming identity and work eligibility, which can help deter and reduce the risk of exploitative arrangements being concealed onsite. This is one control that assists SYD to reduce modern slavery risk in its operations and supply chain.

Training

In December 2025, over 130 SYD staff responsible for managing suppliers, participated in a training session led by Procurement, with A21 and Pillar Two supporting the delivery with a focus on airport-specific signs of modern slavery, particularly human trafficking, and modern slavery risks in Sydney Airport's supply chain. The session provided practical guidance on escalation, referrals, and reporting procedures at SYD and beyond, aligning with the public awareness campaign running across all terminals.

To enhance on-site awareness, airport-specific signs and indicator posters were refreshed and placed inside staff bathroom stalls and strategic locations across the terminals and corporate offices.

Additionally, SYD's security contractor implemented training for approximately 1100 front-line security staff covering modern slavery risks, red flags, real-world examples, guiding principles for response, and internal procedures for handling suspected cases. This training has now been embedded into Security's Sydney Airport induction and annual training programs.

Internal audit

In 2025, SYD continued to employ a risk-based methodology for internal audits, systematically investigating any indicators or risks associated with modern slavery. Audits conducted in 2025 to assess potential modern slavery risks included a Supplier Performance Audit of our third-party security partner, as well as a review of the design and governance of the Airport Operating Licence, which serves as the framework for enforcing minimum operating standards among third parties at Sydney Airport. While these audits highlighted areas for enhancement in key processes and controls managed by both SYD and external partners, no indicators or risks related to modern slavery were identified.

Modern slavery due diligence

Modern slavery due diligence involves the delivery of proactive measures to enable SYD to remain focused on human rights, particularly in the form of forced labour, human trafficking and exploitation. This process is an essential part of an organisation's compliance program and alignment with legal frameworks, such as the Modern Slavery Act and ethical business practices.

SYD's Modern Slavery Due Diligence is executed via its procurement and contract management functions and delivered across six key activities:

- Governance:** SYD's Modern Slavery Working Group meets quarterly (or more frequent as required), to oversee SYD's modern slavery risk, strategies, action plans, assurance programs and opportunities to improve the way SYD manages and oversee risk. Formal agendas and meeting minutes are recorded to maintain a structured and transparent governance approach.
- Policy Development:** SYD has policies (outlined above) that set expectations and reinforce SYD's commitment to respect human rights and reject all forms of slavery. Our expectations are communicated to suppliers and other external stakeholders through contractual obligations, Airport Operating Licence (AOL) requirements (where applicable), training programs, supplier onboarding and ongoing contract management practices.
- Risk Assessment:** In 2024, SYD engaged Pillar Two to identify where heightened risks of modern slavery are in SYD's supply chain. A key component of this risk assessment was identification of specific goods and services procured by SYD which may expose SYD to heightened modern slavery risk. Pillar Two built on this work in 2025, supporting SYD to integrate consideration of identified key modern slavery risk categories into SYD's supplier pre-qualification process and questionnaires.
Introduction of an improved modern slavery supplier profiling assessment within the external Supplier qualification platform, has provided SYD with valuable data to identify, manage and address modern slavery risk.
- Supplier Engagement:** SYD's engagement with external suppliers presents opportunities to address human rights and modern slavery risks through procurement processes and ongoing contract management governance activities. These activities include internal reviews to assess levels of contractual compliance and adherence to ethical standards.
- Monitoring and Reporting:** SYD has systems in place to monitor supply chain risk through its internal assurance programs and supplier profiling activities. Reporting and assurance programs will continue in 2026 to continuously improve the management of risk controls for modern slavery.
- Remediation:** Where instances of modern slavery are identified, SYD has an effective Response Procedure to respond, investigate any grievance and whistleblower issues as they arise. If an issue is identified, it must be escalated to the appropriate SYD representatives, concerns dealt with immediately and effectively as appropriate, including additional support to those affected.

Key improvement actions delivered in 2025 included enhancement of risk control measures and expanded Supplier screening technology platforms to assess and govern Supplier organisational risk, impacts to SYD and broader Cyber, Safety and Sustainability risks.

UN Global Compact Network

During the reporting period, a Procurement team member who also sits on the Modern Slavery Working Group participated in the UN Global Compact Network Australia. Participation strengthens capability to identify, manage and assess modern slavery risks and keeps SYD informed of important best-practice and regulatory developments.

Assessing the effectiveness of SYD's actions

We assess effectiveness through quarterly Working Group reviews, training and desktop reviews of suppliers. SYD's risk management framework is also used to assess the effectiveness of our modern slavery management systems and controls.

Where modern slavery risks have been identified, the process for overseeing these risks will continue into 2026, in alignment with improved supplier / third-party categorisation, assurance oversight to oversee all existing controls, to effectively manage and mitigate risk via structured supplier management frameworks and improved supplier profiling assessments.

How we review and learn

- Quarterly Working Group reviews, with outcomes tracked
- Internal and desktop reviews of Modern Slavery Response Procedures
- Supplier profiling and risk categorisation
- The use of modern-slavery clauses in contracts, and AOL agreements
- Modern slavery awareness training

What we recorded in 2025 (activity baselines)

- Approximately 1,100 security screening officers trained
- 200 suppliers profiled
- No modern slavery notifications from AOL holders

Strengthening modern slavery response

Building on Pillar Two's supply chain modern slavery risk mapping in 2024, process improvements have continued in the areas of risk mapping, updated procurement processes and ongoing training to better address risks and impacts.

Building on Pillar Two's review in 2024, process improvements have continued in the areas of risk mapping, updated procedures and ongoing training to better address risks and their impacts. These steps will help SYD to further align with the UNGP's best-practice and introduction of technology solutions, providing valuable data for analysis and improvement programs.

Effectiveness of the Modern Slavery Response Procedure

Desktop testing of the Modern Slavery Response Procedure in 2025, identified further opportunities to improve the procedure's effectiveness and continues to remain fit for purpose in the management and escalation of grievance and whistleblower reports. The procedure will be further refined in 2026 to maintain its effectiveness for oversight of this risk and subsequent reporting.

Consultation with reporting entities

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

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

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

Partnerships and stakeholder engagement

Australian Federal Police

Sydney Airport continued to engage with the Australian Federal Police (AFP) during the reporting period, including receiving AFP input (through the National Human Trafficking Coordination Crime Command and the Australian Centre to Counter Child Exploitation) on key messages for the "Can You See Me?" campaign delivered with A21, which addresses forced marriage, child exploitation and online exploitation, areas where reports to the AFP have significantly increased. This engagement helps inform awareness messaging on modern slavery risks within the airport environment.

UN Global Compact and Global Compact Network Australia

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

The SYD Modern Slavery Working Group Chair attends ongoing Global Compact Network Australia Modern Slavery Community of Practice seminars and working group sessions. These sessions provide valuable insights into global and Australian regulatory updates including current progress on the introduction to Australian modern slavery due diligence regulations and their potential impact to organisations managing human trafficking and modern slavery risks.

Compliance with mandatory reporting criteria

Mandatory criteria	Reference in this statement
1. Identify the reporting entity	Inside cover
2. Describe structure, operations and supply chains	Inside cover, pages 2 and 3
3. Describe risks of modern slavery in operations and supply chains	Pages 4 and 5
4. Actions to assess & address risks (including due diligence & remediation)	Pages 6, 7, 8, 9 and 10
5. How effectiveness is assessed	Page 11
6. Consultation with owned / controlled entities	Page 12
7. Any other relevant information	Pages 7, 8, 9, 10 and 12
8. Mandatory reporting criteria	Page 13

SYD