



QANTAS MODERN SLAVERY AND  
HUMAN TRAFFICKING STATEMENT 2023  
(CANADA)





## About This Statement

In this Statement a reference to modern slavery refers to forced labour and child labour as defined in section 2 of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)*, as well as the eight types of serious exploitation as defined in the Australian *Modern Slavery Act 2018 (Cth) (Australian MSA)*, namely: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

This Modern Slavery Statement (Statement), is made under the Canadian Supply Chains Act. It sets out the actions taken by the Qantas Group to assess and address modern slavery risks in our operations and supply chains during the year ended 30 June 2023 (FY23).

Qantas Airways Limited (Qantas) is an Australian public company (ABN 16009661901), registered at 10 Bourke Rd, Mascot NSW, Australia. This Statement is made for Qantas and

contains information on both Qantas and its controlled entities (Qantas Group). This includes wholly owned subsidiaries, as well as other entities over which Qantas has control under the Australian Accounting Standards. A list of the controlled entities, which do not meet the threshold for reporting entities under the Supply Chains Act but have been included for transparency, is provided in Appendix 1.

The information set out in this Statement is provided as a consolidated description for the Qantas Group, except where information is identified as relevant to specific entities within the Group. References to the 'Qantas Group', 'Group' and the terms 'we' and 'our' are used in this Statement to refer collectively to the Qantas Group. Unless otherwise indicated, figures included in this Statement are accurate as at 30 June 2023.

Additional information about consultation with owned and controlled entities is set out in section 6.

This Statement is an amended version of the Statement filed under the Australian MSA and s54(1) of the United Kingdom (UK) *Modern Slavery Act 2015 (UK MSA)*. This Statement was approved by the Qantas Board on behalf of Qantas Airways Limited on 18 April 2024 and is signed by the CEO and a Director of the Qantas Board, as required by the Supply Chains Act.

We acknowledge the Traditional Custodians of the land on which we work, live and fly. We pay respect to Elders past, present and emerging.

## CEO Message



As CEO and Managing Director, I am conscious that our responsibility to respect human rights goes beyond public statements of commitments and is measured by concrete actions.

The past financial year was one of immense challenge as the Qantas Group continued its recovery from the pandemic. We more than doubled the amount of flying we did compared to the previous year and we welcomed almost 3000 new employees to the Group.

Throughout the challenges of safely rebuilding our operations, we maintained our focus on strengthening our modern slavery risk management.

Our increased level of flying drove a similar increase in our supplier spend to \$12.3 billion across 5,300 organisations. While two thirds of that is spent within Australia, our global supply chain and operations makes managing human rights risks, including modern slavery, complex.

Over the past year, the Group has continued to improve our understanding of the risks in our supply chains, including through site visits to a number of key suppliers, and completed a deep dive review into our fuel value chain to ensure compliance with our policies

We developed a framework to guide our response in the event modern slavery is discovered within our supply chain, and we're continuing to prioritise training for our people to help them identify the warning signs.

We also participated in two roundtable discussions as part of the Australian Federal Government's McMillian Review of the

Australian Modern Slavery Act and we look forward to further consultation with stakeholders to progress its recommendations.

While we have identified a number of initiatives to improve our program, we know that meaningful change cannot be achieved in isolation and requires a collective response.

This year we will be looking at how we can strengthen partnerships with industry peers and stakeholders to incorporate lessons from their experiences to help combat modern slavery. We will continue to raise awareness and undertake capability building activities with our suppliers to support improvements in their approach. And we will continue to build more trusting relationships across our value chain so we can better work together to address modern slavery.

I am pleased to sign and present this Statement, which was approved by the Qantas Board on 18 April 2024. In accordance with the requirements of the Supply Chains Act, and in particular its section 11, I attest that I have reviewed the information contained in this Statement for Qantas. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Statement is true, accurate and complete in all material respects for the purposes of the Supply Chains Act for the reporting year FY23.

Vanessa Hudson,  
Managing Director and CEO,  
Qantas Group, 18 April 2024

*I have the authority to bind Qantas Airways Limited.*



## Key Areas of Action

During FY23, we progressed key actions to enhance our modern slavery response.



### CONDUCTED SITE VISITS TO SELECTED SUPPLIERS IN THAILAND AND EUROPE

We continued to prioritise direct engagement with selected suppliers, to better understand modern slavery risks in our supply chain. We conducted site visits to two "Tier 2" suppliers in Thailand and one supplier in Europe to understand their modern slavery risk management, build their capacity, and undertake awareness-raising activities, including incorporating guidance on human rights principles outlined in the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs), the Dhaka Principles for Migration with Dignity, and our own Supplier Requirements and Supplier Code of Conduct.

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### UNDERTOOK A DEEP DIVE INTO POTENTIAL ADVERSE HUMAN RIGHTS IMPACTS IN OUR FUEL VALUE CHAINS

We worked with a specialist business and human rights advisory firm to undertake a deep dive review of potential adverse human rights impacts involved in both the conventional and sustainable fuel value chains. This included considering how we could be involved in adverse human rights impacts such as modern slavery in these value chains, in line with the UNGPs. We are using the results to help inform our supplier due diligence and risk assessment in this area.

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### DEVELOPED A MODERN SLAVERY RESPONSE PLAN

We developed a detailed Modern Slavery Incident Response Principles and Guidelines document to guide our response to potential modern slavery allegations relating to our operations and supply chain. The document details key steps we may take to investigate a modern slavery allegation, understand our potential level of involvement, and provide for or cooperate in remediation where appropriate.

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### ENHANCED OUR THIRD-PARTY DUE DILIGENCE APPROACH

We expanded the scope of our third-party due diligence questionnaire (DDQ) to include additional modern slavery indicators and also developed an alternate approach to due diligence of potential business partners (as opposed to suppliers) and piloted this with a potential new airline partner. We translated our DDQ and our Supplier Code of Conduct into a prominent foreign language to facilitate engagement with suppliers. We revised and expanded the expectations we set for our suppliers around modern slavery and broader human rights issues in our Supplier Code of Conduct and Supplier Requirements.

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## Section 1: Introduction

Founded in 1920, Qantas is the oldest continuously-operating airline in the world and the only airline with a network that directly connects Australia to every inhabited continent. As a business with an international footprint, we understand the importance of taking meaningful action to manage potential modern slavery risks across our operations and supply chains.

This is Qantas' first report under the Supply Chains Act and is based on the Qantas Group's fourth Statement under the Australian MSA, and eighth in line with the requirements of the UK MSA. As such, it includes references to prior statements filed under the Australian MSA and UK MSA.

This Statement sets out our approach and actions to manage modern slavery risks in our global operations and supply chains throughout FY23. It outlines the practical steps we have taken and are taking, highlights our key achievements, and identifies areas where we plan to undertake further work.

Although this Statement focuses on our work to manage modern slavery risks, we recognise that we have a responsibility to respect all internationally recognised human rights. Our commitment to respect human rights, including rights related to freedom from slavery, is set out in our Human Rights Policy Statement.

We are committed to continually improving both our modern slavery risk management and our approach to reporting under the Supply Chains Act.

Steps we have taken to strengthen the quality of reporting in our 2023 Statement include the following:

- Continuing to report on our progress against key commitments.
- Including additional information about our supply chain spend, including below tier one level.
- Reporting in detail on new actions taken in FY23, including around supplier engagement, training and work to refine our policies and processes.
- Sharing our reflections and lessons learned in key areas, such as undertaking due diligence in challenging contexts and engaging with suppliers about trusted and accessible grievance mechanisms.

### PROGRESS AGAINST OUR OBJECTIVES

In our FY22 Statement, we highlighted a range of planned initiatives to strengthen our approach to modern slavery risk management. In FY23, we made important progress across these commitments as outlined in the following table.

Initiatives	We said we would	Our progress in FY23
<b>Policy and Governance</b>	✔ Continue to embed modern slavery clauses in our agreements and precedent contracts.	We updated our Supplier Requirements to include additional clauses capturing specific practices relating to modern slavery, including around the withholding of identity or immigration documents; charging of recruitment fees; safeguarding employees' rights; and access to grievance mechanisms.
<b>Risk Assessment and Due Diligence</b>	✔ Re-assess the Group's most salient human rights issues to inform our overall strategy.	In 2018, we completed our first salient human rights assessment and across FY22 and FY23 we engaged a specialist business and human rights advisory firm to undertake a review of our salient human rights issues (see page 38). This work informed the identification of five salient human rights issues for Qantas (outlined in this Statement), which we aim to use to help us focus our human rights risk management. Our refreshed salient human rights issues were published in our 2023 Sustainability Report.
	➔ Extend the scope of the Supply Chain Assurance program to include remaining unassessed supplier base (rather than only new and renewing suppliers).	The investment in this specialised program of work continued throughout FY23. Approximately 1,000 higher priority unassessed suppliers have now been assessed. These supplier assessments triggered over 350 potential human rights risks, of which approximately 240 suppliers were subject to further assessment in line with our risk based approach. This work has continued into FY24.
<b>Training and Awareness</b>	✔ Implement training to support identification and management of modern slavery risks.	We continued to provide a range of training to our personnel across the Group, including tailored face-to-face sessions with our Group Procurement team and with Jetstar Asia staff in Singapore. We also developed an online modern slavery training e-learning module which will be launched in FY24.

Initiatives	We said we would	Our progress in FY23
<b>Grievance Mechanisms and Remediation</b>	➔ Develop a supplier engagement strategy to raise awareness and improve accessibility of our Whistleblower reporting channels for our suppliers and their workers.	We engaged with selected suppliers during FY23 to understand their approach to grievance mechanisms and raise awareness of the importance of these mechanisms being trusted and accessible. We also updated our Supplier Code of Conduct and Supplier Requirements to emphasise our expectations for suppliers in this area.
	➔ Explore how we can better provide trusted and accessible grievance mechanisms, including by modifying our Whistleblower program to better address modern slavery grievances.	We are continuing to consider scope for further work in this area, following the development of our Modern Slavery Incident Response Principles and Guidelines document.
	✔ Strengthen our remediation process and response protocols.	We developed a Modern Slavery Incident Response Principles and Guidelines document to guide our response to any potential modern slavery incidents or allegations relating to our operations and supply chain. It details key steps we may take to investigate a modern slavery allegation, understand our potential level of involvement, and provide for or cooperate in remediation where appropriate.
<b>Collaboration and Stakeholder Engagement</b>	✔ Engage relevant internal stakeholders in our salient human rights assessment.	As part of our review of our salient human rights issues, we convened a Group-wide, cross-functional workshop to identify potential examples of relevant adverse human rights impacts, the themes of which were subsequently validated in a series of internal stakeholder consultation sessions. Our refreshed salient human rights issues were published in our 2023 Sustainability Report and are also included in this Statement.

✔ Complete ➔ Partially Complete – Continue in FY24

### LOOKING AHEAD TO FY24 AND BEYOND

We will maintain our focus on transparently disclosing our actions to address the Group's potential modern slavery risks in our global operations and value chains, and continue to look for ways to further improve and mature, including:

- Continuing to develop the actions that underpin the management of our salient human rights issues, including in relation to modern slavery.
- Collaborating with our Inflight Services team to establish a risk-based supplier site visit program, building capability and awareness of specific modern slavery risk indicators for integration into existing site-visit assessments.
- Implementing our automated modern slavery DDQ to include additional modern slavery risk indicators including adapting the underpinning risk model to ensure it is reflective of the evolving risk environment.

- Developing an approach to incorporate human rights considerations into due diligence of strategic commercial partnerships and potential investment opportunities, linked with our Sustainability Strategy.
- Continuing to expand our supplier engagement, including through visits to supplier sites and other awareness-raising activities.
- Exploring scope for engagement with airline peers in our region and globally.
- Launching our online modern slavery awareness training module for employees.

We will also continue to progress the work on initiatives that have a status of partially complete.



## Section 2: Our Structure, Operations and Supply Chains

Qantas (the Group parent), headquartered in Sydney, is Australia's largest domestic and international airline and is a publicly listed company traded on the Australian Securities Exchange (ASX: QAN). Qantas has a range of subsidiary businesses that all, in one form or another, support the overall operations of the airline Group.

The Group primarily consists of four operating segments, which work together as an integrated portfolio:

- Qantas Domestic.
- Qantas International (including Qantas Freight).
- Jetstar Group.
- Qantas Loyalty.

The Group's main business is the transportation of customers using two complementary airline brands – Qantas and Jetstar. Our airline brands operate regional, domestic and international air passenger services. This involves a range of operational activities and functions, both in-house and contracted, including pilot and cabin crew operations, aircraft engineering and maintenance, catering, ground handling, cleaning services, and other operational airline support services (see page 10).

The key hubs for our airline business are located in Australia, New Zealand, Singapore, the UK and the United States of America (USA). In these locations, we have commercial offices with teams performing corporate functions, such as finance, commercial, sales and marketing, as well as employees to support flying operations, such as cabin crew, engineering and freight.

In addition to the core business of transporting passengers, the Group's broader portfolio of business operations includes freight and an Australian road feeder service for international cargo, frequent flyer and business rewards programs, and online retail. The Group also has interests in associated businesses, which are described on page 9.

### IN FY23

**221,274**

Qantas domestic passenger flights

**35,420**

Qantas flights to or from Australia

**13,361**

Dedicated freight flights

**84,434**

Jetstar domestic passenger flights, inclusive of New Zealand domestic flights

**16,582**

Jetstar flights to or from Australia

**11,361**

Jetstar Asia passenger flights



### Illustrative Comparison of Volume of Flights Operated FY22/F23



#### OUR CUSTOMERS

We provide services to a diverse range of customers based in Australia and overseas. Our customers range from passengers travelling on any of our Group airlines to our Loyalty and Freight corporate customers and online retail customers. We also hold contracts with the Australian Government and its agencies to provide various services.



#### Airline

45M+ Customers carried on Group aircraft



#### Loyalty

Over 15M Frequent Flyer members



#### Online Retail

282,650 unique online retail customers and 454,580 orders



#### Freight

~1,040 major customers and carried 280M kgs of freight



OUR STRUCTURE

The table below provides more information about our key operations and businesses.

Overview of our Operations and Brands

Operations	Overview	Businesses
Airline	Our main airline business transports customers using two complementary brands — Qantas and Jetstar. Our airline brands operate regional, domestic and international passenger services using 326 aircraft.	
Loyalty	Our Loyalty program undertakes activities connected to earning or redeeming Qantas Points across our broad range of business areas through commercial partnerships, including Qantas Wine, Qantas Marketplace (previously known as Rewards Store), Qantas Hotels and Holidays, Qantas Insurance and Money, Qantas Business Rewards and retail partnerships (e.g. Woolworths, BP, ANZ, Westpac).  Most of these operations are in Australia, but some activity occurs in New Zealand. More information about Qantas Loyalty is included on page 17.	
Freight	Qantas Freight is Australia's largest air freight services business, using 18 dedicated freighter aircraft as well as passenger aircraft belly space across the Qantas Group fleet to ship cargo to over 350 destinations domestically and globally every year. With 22 cargo handling terminals globally and with an extensive network of trusted business partners, including road transport operators, Qantas Freight offers an integrated end-to-end air freight solution. In FY23, Qantas Freight served over 1,000 customers, and carried 280 million kilograms of freight.	
Associated Businesses	Qantas Loyalty also manages the Qantas Group's interests in Vii, Taylor Fry and TripADeal.  Vii is a wholly owned subsidiary which acts as a technology services provider specialising in gift cards and loyalty solutions. Vii's customer base is predominately Australian, but includes some international transactions in the UK, US, New Zealand and Japan.  Taylor Fry is a majority owned subsidiary of Qantas, in which Qantas holds a 51 per cent controlling interest. The remainder of the shares in Taylor Fry are held by the employees. Taylor Fry is an actuarial and analytics services provider that operates in Australia and New Zealand. The Group does not have operational or day-to-day control of Taylor Fry.  TripADeal is a majority owned subsidiary of Qantas, in which Qantas holds a 51 per cent controlling interest. The remainder of the shares in TripADeal are held by its founders and other investors. TripADeal is an online travel agent offering bucket list tours, cruises and hotel escapes.	
Support Services	Supporting our flying operations are a number of operational business areas, including Engineering and Maintenance, Flight Training, Safety, Health, Security, and Customer Services, as well as Group corporate support functions, such as Sustainability, Treasury, Legal, Strategy, Corporate Affairs, Finance, Procurement, Human Resources, Risk, Compliance, and Technology. Most of these functions are conducted from Australia; however, we have corporate support teams located in New Zealand, Singapore, Japan, Hong Kong SAR, China, USA and the UK.	

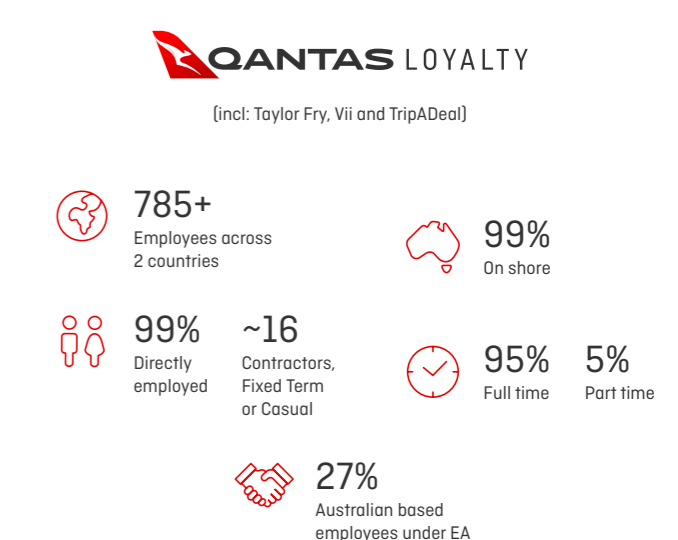
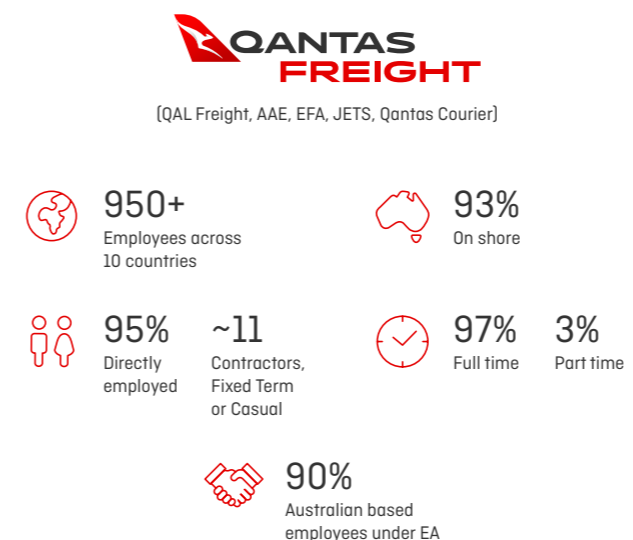
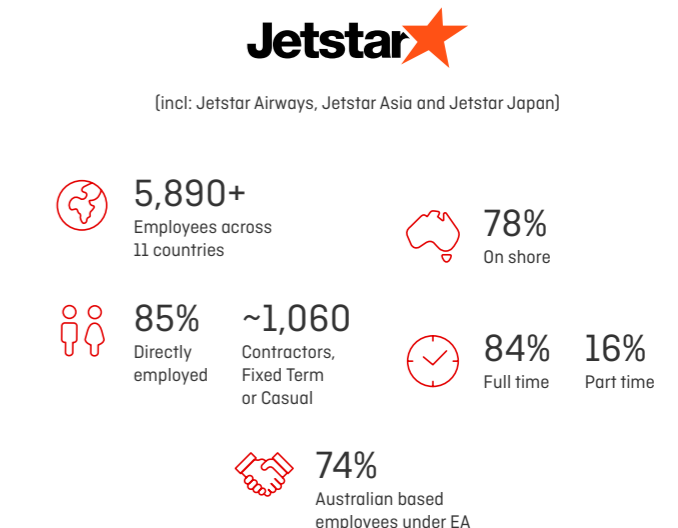
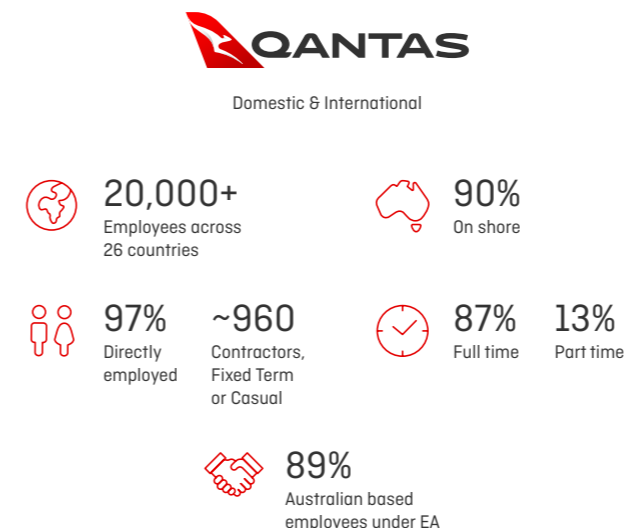
OUR WORKFORCE<sup>1</sup>

Our global workforce consists of more than 27,000 employees across 27 countries, of whom 95 per cent are directly employed by a Group entity, either by an individual contract or under enterprise agreements (EA) and in accordance with relevant national employment legislation.

Within Australia, 81 per cent of our employees hold operational roles, such as pilots, cabin crew, engineering and maintenance, customer service, freight operations, and safety. The remaining 19 per cent of our employees provide operational support, in areas such as aircraft load control, meteorology, flight planning services, or deliver corporate services, such as risk and compliance, finance, legal, treasury, and human resources.

Our operations also include a proportion of indirect workers who deliver services under contracts between the Group and specialist providers, whereby we are one of many clients. These indirect workers include contractors, contingent workers and outsourced labour hire resources that support our business in areas such as cabin crew, ground handling, baggage services, catering, cleaning, security services, IT, and payroll services.

During the reporting period, we continued recruitment to expand our workforce. Since borders re-opened, we have recruited 2,400 pilots and cabin crew, as well as staff for other areas of our operations.



ACROSS OUR WORKFORCE

46% of our people identify as female      54% of our people identify as male  
 <1% prefer not to nominate      1.4% of our people identify as Aboriginal or Torres Strait Islander

<sup>1</sup> Total number of employees of wholly owned entities of the Qantas Group, as well as Jetstar Asia Airways Pte Ltd, and majority owned entities Holiday Tours, Travel Ltd and Taylor Fry holdings Pty Ltd and TripADeal Pty Ltd.

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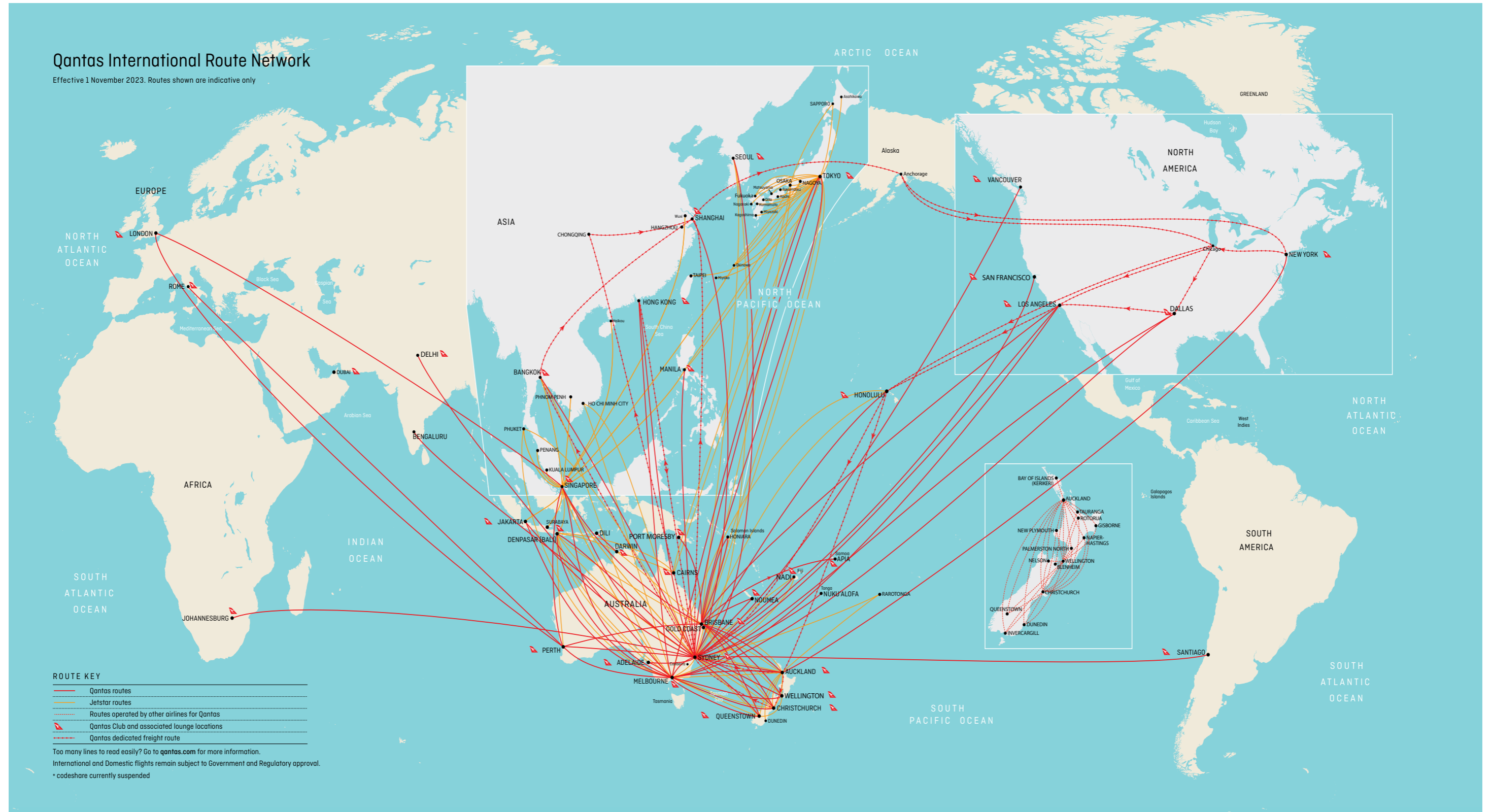


OUR OPERATIONS

FY23 saw the Qantas Group more than double the amount of flying compared to FY22. We expect to continue to grow in FY24, including by adding around one million seats to our international network.

During the reporting period, we:

- Launched four new domestic routes.
- Resumed routes to key international destinations including Tokyo and Narita, Santiago, Hong Kong, San Francisco and New York (via Auckland).
- Expanded into 10 new international routes, including from Sydney to destinations such as Bengaluru, Samoa, Tonga, Rarotonga, Seoul and New York via Auckland. We also started flights from Melbourne to Jakarta and Dallas Fort Worth, and new services from Brisbane to Samoa and Auckland; and
- Brought back four widebody aircraft into our fleet and received 10 new aircraft across Qantas and Jetstar.



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**OUR GLOBAL SUPPLY CHAIN**

The Group procures services, goods for resale, and goods not for resale, through a diverse global supply chain.

The majority of our procurement across the Group is undertaken through our centralised Group Procurement function, which supports a consistent, Group-wide approach to modern slavery risk management in relation to our suppliers.

Our Group Procurement team lead the strategic sourcing, supplier selection and onboarding processes. Once on-boarded, the business unit that has engaged the supplier is responsible for oversight and governance, including management of risks identified during the Supply Chain Assurance process.

In FY23, Qantas' overall supplier spend almost doubled from \$6.5 billion in FY22 to \$12.3 billion. This increase is in line with the resumption of services and the expansion of our operations and business activity as we emerge from the major impacts of the pandemic.

Consistent with this increase in spend, our supply chain network continued to evolve after the global impacts of COVID over recent years. In FY23, our direct global supply chain consisted of approximately 5,300 direct suppliers, compared to approximately 5,000 in FY22.

Across these suppliers, just over 80 per cent of our spend is concentrated with our top 100 suppliers. This concentration of

spend with a smaller number of suppliers supports us to build strong, long-term relationships with key suppliers, which can assist us to better understand a range of risks associated with our supply chain.

While our overall spend increased, our procurement spend categories remained similar to FY22, with a shift away from procurements of certain products, such as our FlyWell packs, masks, gloves, and rapid antigen tests, and a significant increase in key categories such as fuel, food and beverage, people and inflight goods and services. In addition, across FY23 we spent \$13.1 million across 30 First Nations suppliers. Our First Nations business network encompasses a diverse range of categories and services including food and beverage, cyber security, laundry, marketing, promotional goods, contract labour, medical assistance (flu shots), consulting, facility maintenance and construction projects.

The charts on page 15 and page 16 illustrate key supplier spend information including the countries where we have the highest concentration of spend, the volume of suppliers in those countries and our spend by category. It also includes information on our procurement spend with suppliers located in Canada. This information supports our understanding of our evolving modern slavery risk profile. More information about the countries our suppliers source from is included in the risks section of this Statement (see page 25)

**MANAGING THE CONTINUED IMPACTS OF COVID**

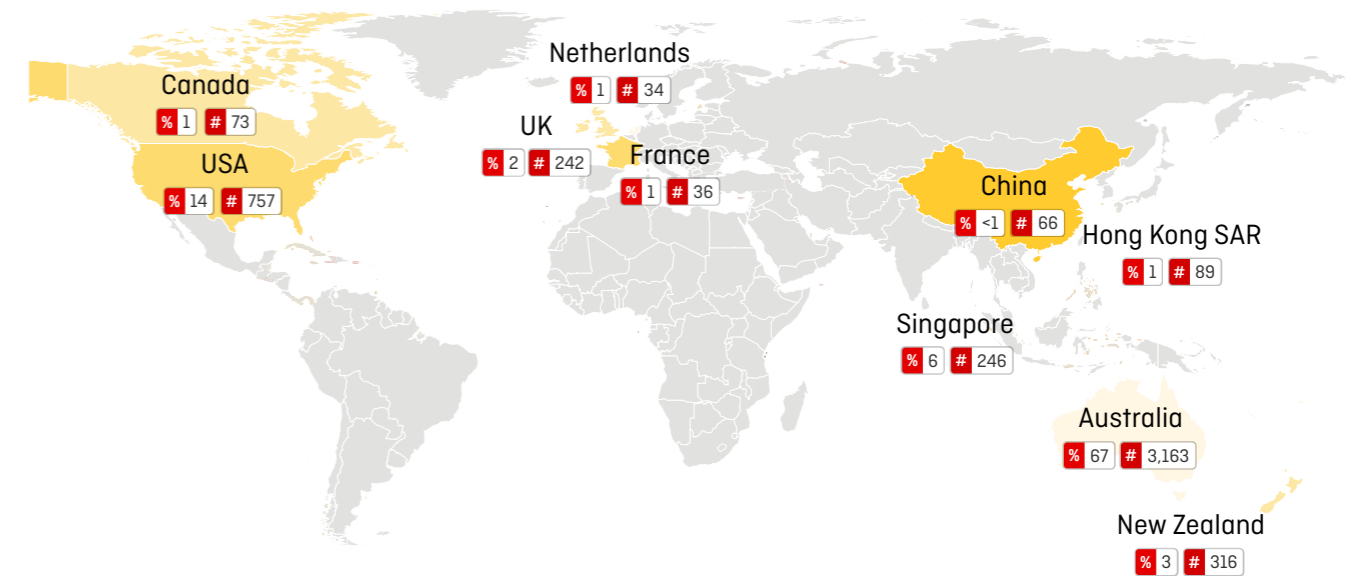
Our international footprint means we were particularly exposed to the impacts of the COVID pandemic, which continued to have an effect our business and supply chains throughout FY23.

Our overall business activity increased, including as we sought to re-engage suppliers as our operations resumed, and in our supply chains, suppliers in some areas continue to report difficulties sourcing sufficient numbers of workers as a result of parts of the working population returning home during the pandemic. We understand that the broader impact of the pandemic resulted in worker shortages across global supply chains, which, in some circumstances, may heighten risks of exploitative practices, such as excessive working hours. Our suppliers have reported that with the easing of COVID restrictions, workers shortages are less prevalent.



**OUR GEOGRAPHIC SPEND — TOP 10 COUNTRIES**

This map illustrates the top 10 countries of our overall procurement spend and the concentration of our tier one suppliers in those countries. The coloured shading of these 10 countries illustrates the estimated prevalence of modern slavery in those countries, according to Walk Free Global Slavery Index World Map 2023<sup>2</sup>.



**KEY**

<b>%</b> Percentage	Represents the percentage of Qantas' overall global procurement spend in each of the top 10 countries of spend, as per our Accounts Payable system.
<b>#</b> Number	Represents the total number of tier one (direct) suppliers engaged by Qantas in each of the top 10 countries of spend as per our Accounts Payable system.
<b>Country</b>	Has been determined based on the supplier address located in our Accounts Payable system.
<b>Coloured Shading</b>	Represents the estimated prevalence of modern slavery by country (noting estimated prevalence per 1,000 population for the 10 countries with the highest prevalence).

**Total spend: \$12.3B** 66% Total spend in Australia, including \$13.1 million with First Nations Suppliers

**Total number of suppliers<sup>3</sup>: 5,291** 83% Spend with the top 100 suppliers

96% Spend with the top 500 suppliers

<sup>2</sup> Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation. Available from: <https://walkfree.org/global-slavery-index/>. For clarity this map is not indicative of every country of our procurement spend and Qantas acknowledges spend may occur in countries that are not indicated on this map, and which may have varying levels of modern slavery risk.

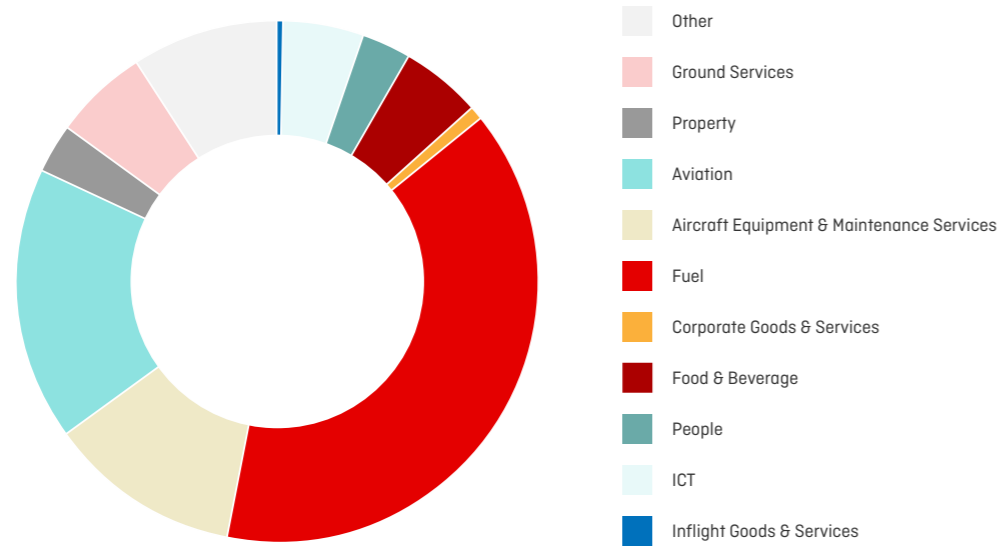
<sup>3</sup> Total suppliers are reported at the parent level; however, the Supply Chain Assurance program includes assessment of suppliers at the child level. In this Statement, country location is based on the supplier address located in our Accounts Payable system. We acknowledge this may not necessarily reflect the country from where the product or service is sourced, which may change the risk profile. The data represented in this table was accurate as of 30 June 2023; however, reported data will continually fluctuate with normal sourcing activity including new suppliers, deactivation of suppliers, sourcing needs and spend patterns and activity.





WHAT WE SOURCE

This visual explains our procurement sourcing footprint over FY23, including identifying the key categories of our spend and the types of goods and services that fall under each category<sup>4</sup>.

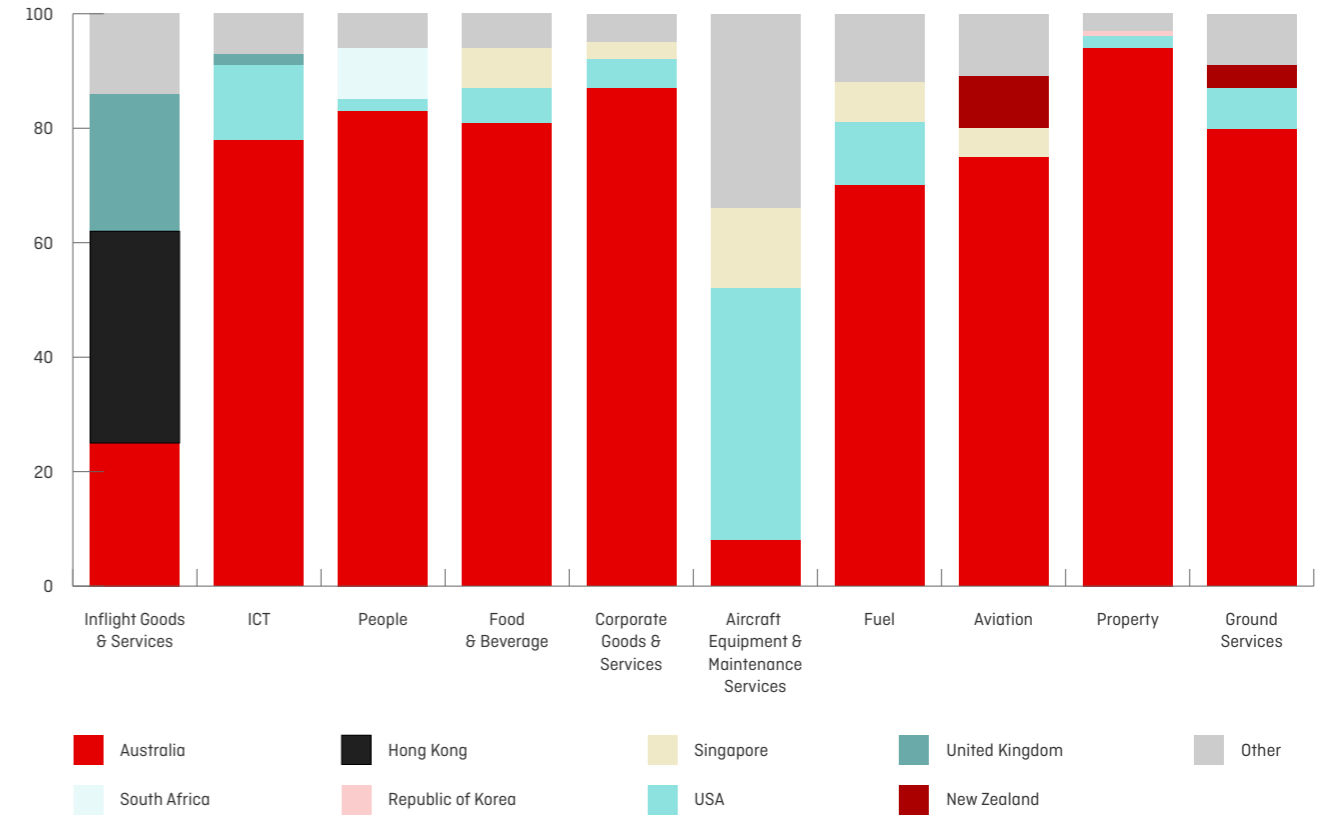


Category	Share of spend	Summary of category
<b>Inflight Goods &amp; Services</b>	<1%	Inflight Goods and Services involve the purchases of items to facilitate positive inflight experiences for passengers during their travel journeys, such as passenger amenity kits, headsets, sleeper suits, blankets and pillows, as well as rotatable items such as glassware, teapots, cutlery and containers.
<b>Information and Communication Technology (ICT)</b>	5%	ICT covers managed service costs for outsourced services, including end user computing, infrastructure, cloud, network, communications, mobility and application support. ICT also includes project and external supplier costs for IT project development and system fees.
<b>People</b>	3%	The People category incorporates all professional services that support the growth and development of our employees, combined with consulting, contract and recruitment services.
<b>Food &amp; Beverage</b>	5%	The Food and Beverage category refers to any food or drinks consumed by our customers onboard aircraft and in our lounges.
<b>Corporate Goods &amp; Services</b>	1%	Corporate Goods and Services refers to products and services used by our staff, such as office supplies, general day to day operations, such as uniforms and clothing, and medical spend.
<b>Fuel</b>	39%	The Fuel category covers all air and ground-based fuel used to service transportation needs, domestically and internationally.
<b>Aircraft Equipment &amp; Maintenance Services</b>	12%	This category consists of equipment, components and materials used on aircraft and associated maintenance (for example aircraft parts, systems, engines, hydraulics and cabin interior and inflight entertainment electronics).
<b>Aviation</b>	17%	The Aviation category includes aviation charges incurred by airlines for their operations, including overflight and route navigation charges.
<b>Property</b>	3%	The Property portfolio includes building design services, construction, fit outs, facilities maintenance, waste management, cleaning and utilities. These services are applicable to both Qantas Group owned and leased properties and includes passenger and freight terminals, offices, hangars, catering facilities and call centres.
<b>Ground Services</b>	6%	Ground Services encapsulates the parts, services and equipment used to service aircraft while parked at an airport terminal, and includes flight simulator services, security, company vehicles and hired vehicles.
<b>Other</b>	9%	This category covers the different types of financial transactions made by the Group in categories such as: <ul style="list-style-type: none"> <li>— <b>Other Loyalty:</b> Costs associated with fulfilling customer orders as a result of the redeeming of frequent flyer points, e.g. use of gift cards through the Qantas Marketplace.</li> <li>— <b>Marketing and Promotions:</b> Marketing and Promotions refers to the end-to-end activities involved in researching customers, then using these insights to tailor strategies to attract new customers and better engage with existing customers.</li> <li>— <b>Fleet Procurement:</b> Fleet Procurement relates to the purchasing and hire of aircraft fleet to fly customers to their destinations.</li> <li>— <b>Banking and corporate finance, carbon offset transactions and miscellaneous spend.</b></li> </ul>

<sup>4</sup> Percentages have been rounded and may not add to 100%. Spend for Taylor Fry and TripADeal are excluded.

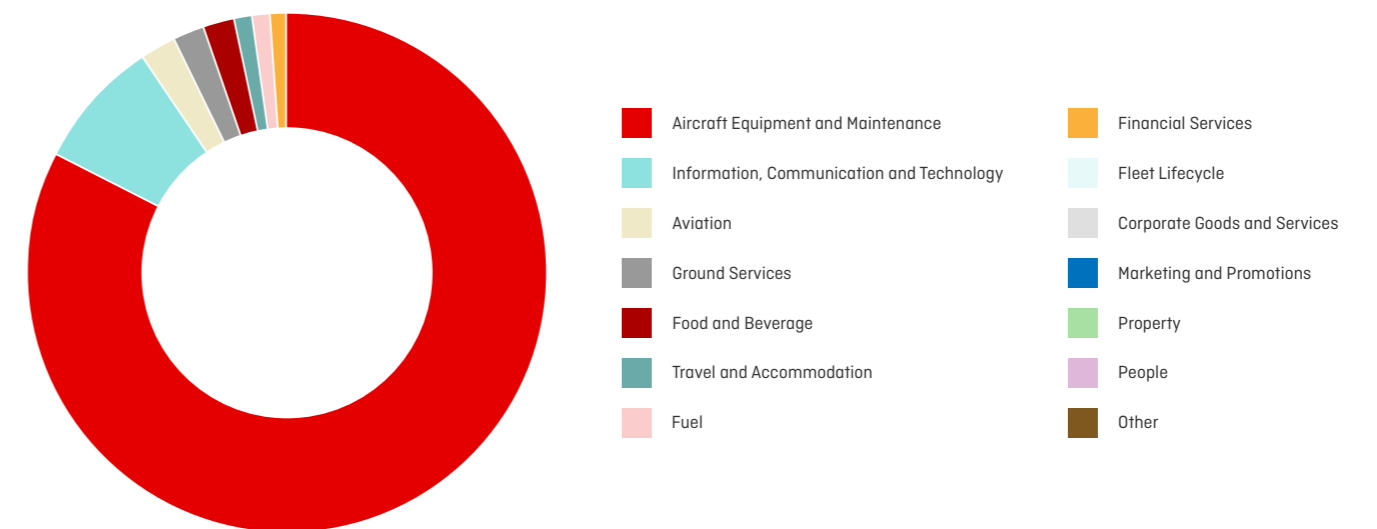
OUR TOP SOURCING COUNTRIES<sup>5</sup> BY CATEGORY (%)

Our geographic sourcing footprint can vary by category. This variation provides important context for our modern slavery risk profile (described in the next section). For example, in some cases we may procure goods associated with a potentially higher risk of modern slavery from suppliers located in countries that also have a comparatively higher prevalence of modern slavery. As outlined in the risks section, suppliers located in one country may also have operations or sub-suppliers in other countries, which can also affect our modern slavery risk profile.



OUR SOURCING FOOTPRINT IN CANADA

Analysis of our Accounts Payable system data has identified that over FY23, the Group transacted with 73 tier one suppliers with a country location nominated as Canada. Further analysis identifies that in the same period, the total spend with these suppliers was approximately AUD\$100 million with 89% of spend in Canada occurring across the categories of Aircraft Equipment and Maintenance and ICT. The visual below displays the categories of procurement spend across our tier one suppliers located in Canada.<sup>5</sup>



<sup>5</sup> Country location is based on the supplier address located in our Accounts Payable system.



**UNDERSTANDING OUR SUPPLY CHAIN: QANTAS LOYALTY**

Qantas Loyalty procures goods for resale by Qantas Wine and Qantas Marketplace, as well as services to support revenue generation through white label products such as credit cards and insurance through Qantas Insurance and Qantas Money. More general goods and services to support Qantas Loyalty's operations are predominately acquired through the Qantas Group, with some additional IT services acquired directly and our call centre services acquired on separate contracts.

**WHERE WE SOURCE FROM:**

Qantas Wine has approximately 460 suppliers of food and alcohol products, predominantly in Australia, with three suppliers based in France, two in Italy, one in Japan and one in New Zealand (NZ). The origin of the products purchased by Qantas Wine includes products originating from Australia, Argentina, Austria, Belize, France, Chile, China, Cuba, England, Germany, Greece, Ireland, Italy, Jamaica, Japan, Mexico, USA, Netherlands, NZ, Poland, Portugal, Scotland, Spain and Sweden.

Qantas Marketplace has approximately 204 suppliers, also predominantly in Australia, with 23 based in NZ (location information is based on the legal entity with which we contract, not origin of product). All of our white label partners are Australian companies (e.g. Auto & General), or Australian branches of global companies (e.g. Citibank).

Qantas Loyalty also contracts with 96 IT service providers, 36 in USA, 45 in Australia, two in Germany, two in India, four in UK, one in the Czech Republic, one in Singapore, one in Switzerland, one in Poland, one in Malta, one in Ireland and one jointly Turkey/USA. Our contact centre services are provided through a third-party service provider (TTEC). TTEC is an Australian legal entity; however, our contact centres are

predominately based in the Philippines (Manila and Duma), with an additional small onshore call centre in Gosford (NSW). The case study below outlines more detail on how we engage with TTEC.

**OUR ENGAGEMENT WITH TTEC**

TTEC has a team of approximately 500 workers supporting the Qantas account from the Philippines, and as well as their own internal policies and principles on human rights and modern slavery, which promote the respect and protection of workers' rights including fair working conditions and wages, TTEC is required to follow our Supplier Code of Conduct. Our Loyalty team works closely at an operational level with workers, interacting on a daily basis to support delivery of service to our customers. We also have formal engagement sessions with TTEC Management and receive monthly reports on key performance indicators, overtime levels and work volume, as well as regular reports on attrition and staff engagement, which supports us to identify and address any potential issues.

In addition to this engagement, we undertake site visits, typically on a quarterly basis, and when onsite we hold focus groups with agents (often without leadership in the room), enabling us to obtain feedback from workers. Undertaking site visits and engaging directly with workers provides valuable on the ground insights into the working environment. For example, in one of the focus sessions, workers raised with us that on Saturdays there was not a workforce management person on shift during the morning, which meant that often the team were not able to distribute the calls fairly across the sites. We escalated this issue with TTEC Management, which resulted in roster adjustments to address the issue. TTEC also operates a confidential helpline available in all countries for its employees, suppliers and the broader public, and encourages the reporting of concerns, including anonymously, without fear of retaliation.

**QANTAS LOYALTY RETAIL CUSTOMERS — UNIQUE CUSTOMERS FOR THE YEAR**



Australian website

**191,871**



New Zealand website

**5,075**



Qantas Wine website

**75,195**



Qantas Wine call centre

**10,506**



Wine and Marketplace Customers (Au and NZ)

**282,647**

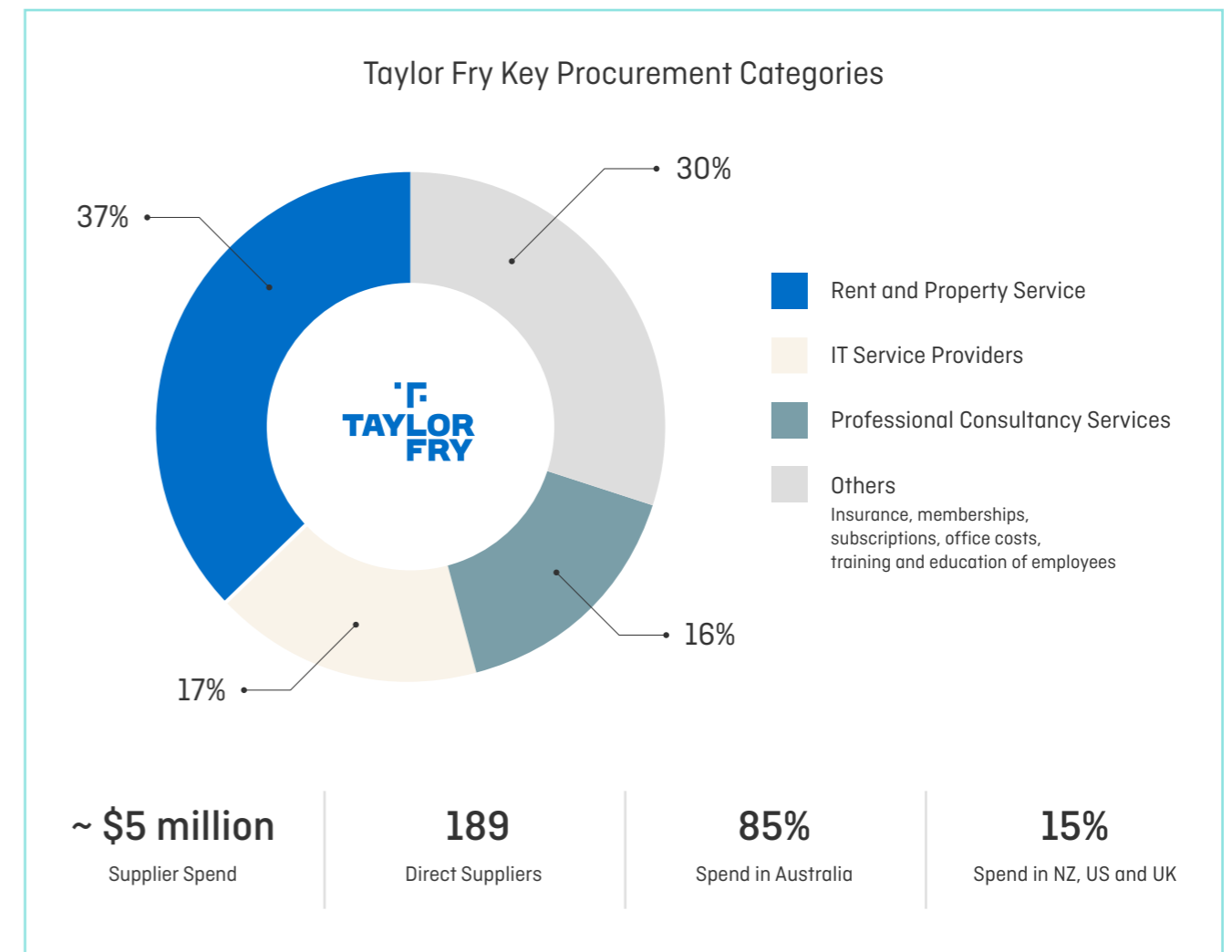
**BUILDING OUR UNDERSTANDING OF OUR ASSOCIATED BUSINESSES' SUPPLY CHAINS**

Qantas Loyalty also manages the Group's interests in certain associated businesses, which are described in the table on page 9 and include Taylor Fry (an actuarial and analytics services provider). At 30 June 2023, Taylor Fry had 115 direct employees located in Australia (105) and New Zealand (10). The nature of our associated businesses' operations means that they may operate independently from the wider Group and use different supply chains.

We understand the importance of working to address any modern slavery risks that may be associated with these businesses, including by integrating them into our wider modern slavery risk management response. For example, Taylor Fry personnel are not subject to Group policies and procedures and it does not procure through the Group Procurement function. Taylor Fry undertakes its own sourcing activity and across its own supply chain has 189 direct suppliers. In FY23, Taylor Fry's procurement spend was \$5million<sup>6</sup> predominantly across four countries. The nature of the suppliers ranges from IT service providers (44), rent and property related services (29), office supplies (9), consultants (15) and a number of other service-based suppliers. Of Taylor Fry's 189

suppliers, 140 are Australian, 38 are in NZ, five are in the US, four in the UK, one in Germany and one in Ireland.

Taylor Fry only sources non-resale products and services to support its business operations. While, as a professional services business, the risk of modern slavery in its operations is assessed as low, we recognise that procurement of IT and property services more generally can involve modern slavery risks, including the provision of cleaning and facilities management services for corporate offices and the prevalence of potential forced labour or child labour risk that may exist deeper in supply chains associated with the raw materials used in IT equipment. Across FY23, our Business Integrity and Compliance team continued to support Taylor Fry to undertake initial due diligence activities of selected direct suppliers, via our third-party risk management platform, Exiger, focusing on higher risk categories of procurement such as property. This activity has helped Taylor Fry to better understand its modern slavery risk profile and to support the company's approach to managing modern slavery risks. Additionally, across FY23, Taylor Fry has collaborated with various stakeholders across Qantas to support the uplift of key policies, and work is underway to develop a bespoke ethical sourcing policy.



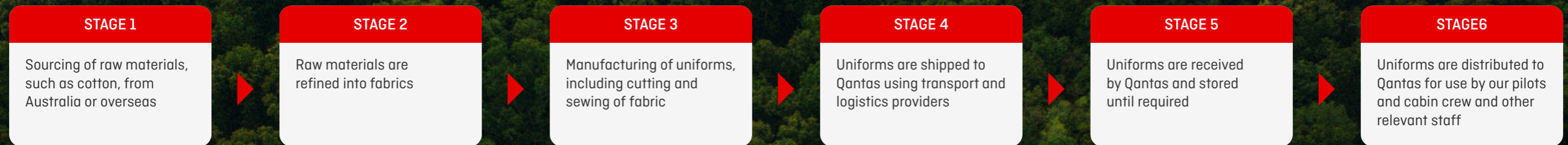
<sup>6</sup> Restating FY22 total supplier spend from \$17.6m to \$4.2m, this is exclusive of taxes (\$10m), superannuation (1.5m) and dividend paid (\$1.9m).



UNDERSTANDING OUR EXTENDED SUPPLY CHAIN BEYOND TIER ONE

Modern slavery risks in supply chains can often occur below the level of our direct suppliers (tier one), which can make it more difficult to identify and manage these risks. The indicative<sup>7</sup> visuals below represent some of the key elements of the supply chains involved in our procurement across three key goods: uniforms, sustainable aviation fuel, and aircraft.

Uniform Supply Chain



Sustainable Aviation Fuel (SAF) Supply Chain



Aircraft Supply Chain



<sup>7</sup> It is important to note, this visual is intended as an indicative example only and is not representative of the end to end supply chain, or the people and processes involved.



## Section 3: Risks of Modern Slavery Practices in Our Operations and Supply Chains

### UNDERSTANDING OUR RISK PROFILE

The aviation sector operates in a complex and rapidly evolving global environment, and the Group undertakes a diverse range of business activities.

In this context, we understand that our modern slavery risk profile will continue to shift over time and will be influenced by internal and external factors, both in our operations and across our supply chains.

This includes social, economic and geopolitical factors, conflict and civil unrest, as well as environmental factors such as climate change or natural disasters. The expansion of the Group to include new associated businesses, as well as broader structural factors may also affect our modern slavery risk profile.

In line with the UNGPs, we understand 'modern slavery risks' as meaning the potential for our business to cause, contribute to, or be directly linked to modern slavery.

We assess modern slavery risks using the lens of 'risk to people' in addition to risk to our business. For example, although many of the potential risk areas identified in the table on page 24, are areas where our expenditure is comparatively low, the risk to people may be comparatively higher than other areas of our supply chain.

The adjacent breakout box explains how businesses might cause, contribute or be directly linked to modern slavery under the UNGPs and includes a series of hypothetical examples relevant to the aviation sector to help show the potential risk of our involvement in modern slavery.

### WHAT ARE MODERN SLAVERY RISKS?

The UNGPs are the authoritative global standard for how businesses should manage their involvement in potential and actual adverse impacts on human rights. They set out a three-part continuum of involvement, to support businesses to understand how they may be involved in potential and actual adverse human rights impacts, such as modern slavery. We have considered how this continuum may be applied across the airline industry and our operations and supply chains.

**CAUSE:** Businesses may be involved in modern slavery where their actions or omissions directly result in modern slavery occurring. For example, an airline could cause modern slavery if it intentionally subjected workers to serious exploitation, such as debt bondage or forced labour.

**CONTRIBUTE:** Businesses may contribute to modern slavery where their actions or omissions significantly facilitate or incentivise modern slavery to the extent that the exploitation would have been unlikely to occur without them. For example, an entity may contribute to modern slavery if it sets a deadline for a supplier to deliver products at a reduced cost or in a timeframe that it knows the supplier will be unable to meet without exploiting workers.

**DIRECTLY LINKED:** Businesses may be directly linked to modern slavery where their products, services or operations are directly linked to harm carried out by a third party, such as a supplier. For example, an airline may be directly linked to modern slavery if components in the aircraft it operates are manufactured by suppliers in the extended supply chain using materials produced using forced labour.

The nature of businesses' involvement in modern slavery or other human rights harm also determines the manner in which businesses are expected to respond, including in relation to remediation.



### HOW WE IDENTIFY POTENTIAL RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

We recognise that the level of modern slavery risk in our operations and supply chains is influenced by a range of factors, including geographic, sector, and product specific factors, and we incorporate these considerations into our risk assessment processes.

We work to proactively identify potential modern slavery and broader human rights risks across our global operations and supply chains, performing environmental scanning to identify modern slavery trends, relevant changes in global legislation, thematic issues in investor discussions and civil society commentary. More information about how we assess our risks is set out in the below diagram and, in the table on page 24, we outline the categories of products and services that we procure, in which we have identified the potential risk of modern slavery in our supply chains may be more prevalent.

### POTENTIAL RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

The following page provides an example of potential modern slavery risk areas we consider as relevant across the airline industry and which, therefore, may be present across our global operations and supply chains. It also demonstrates how we understand these potential risks through the UNGPs' cause, contribute, directly linked continuum of involvement. We have not identified any significant changes to our risk profile over FY23 and consider we have a strong suite of controls in place to manage these risks.

### MODERN SLAVERY RISKS AND LABOUR RIGHTS ISSUES RELATED TO OUR EMPLOYEES

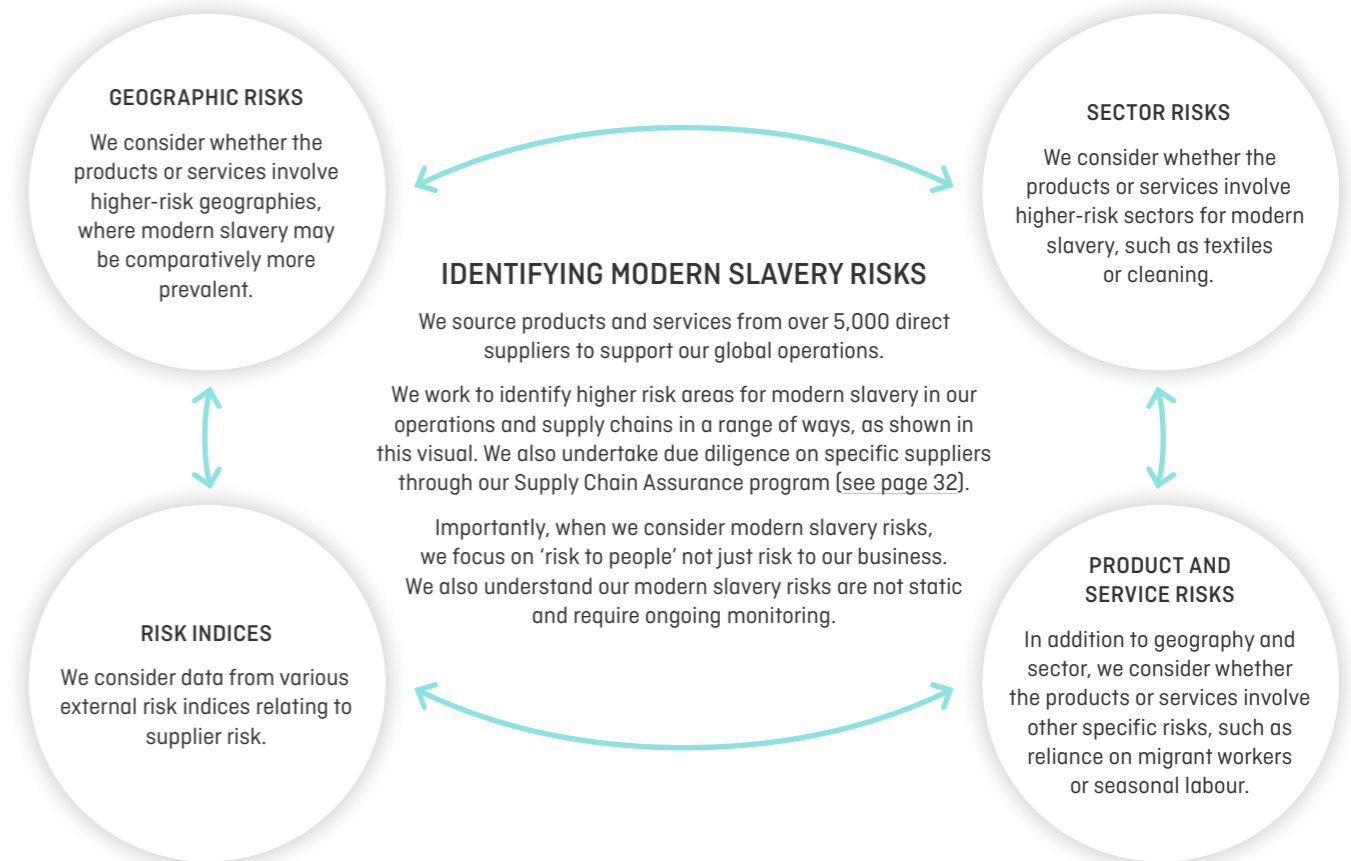
We consider our direct workforce to involve a negligible risk of modern slavery, which is effectively mitigated by our existing human resources processes and controls.

Our employees are directly engaged under contracts or enterprise agreements made under the provisions of Australian or relevant national employment legislation and are supported by a robust policy framework which aims to ensure a safe and fair working environment.

In light of our understanding that broader labour exploitation may lay the foundations for modern slavery, we also recognise the rights of our employees to freedom of association with unions and collective bargaining, and the Group has established channels for engaging with respective unions. There are approximately 56 industrial instruments across the Group and representation from 13 unions.

### CONTEXT OF THE OUTSOURCING DECISION BY QANTAS

In September 2023, the High Court upheld the findings of the Federal Court that Qantas' decision to outsource the remainder of its ground handling function in 2020 was a breach of the Fair Work Act. We deeply regret that the circumstances in 2020 necessitated difficult decisions across much of our workforce, including the retrenchment of the 1,700 workers involved. While the Group would never engage in any conduct that it knew or suspected was unlawful and while the Federal Court originally found that there were valid and lawful commercial reasons for the outsourcing, the Court could not rule out that Qantas also had an unlawful reason — namely, avoiding future industrial action. The process with the Federal Court on appropriate compensation has commenced. The company is determined to and begun an internal review process to learn from this unfortunate event.





POTENTIAL RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Potential modern slavery risks in our operations



HUMAN TRAFFICKING

The risk that we may be *directly linked* to or, without appropriate controls in place we may *contribute* to, modern slavery should our airline services be used by third parties to transport modern slavery victims internationally or within countries. We also recognise that airline services may be used by offenders for illicit labour trafficking involving debt bondage or to travel overseas for the sexual exploitation of persons in travel and tourism. We recognise that these risks are likely to increase as domestic and international travel resumes. We work collaboratively with relevant authorities and agencies to combat this issue.



PEOPLE

The risk that we may be *directly linked* to or, without appropriate due diligence, contractual controls and monitoring processes, we may *contribute* to modern slavery involving our indirect workforce. While we have assessed the risk of modern slavery involving our direct employees as low, we recognise contracted or contingent workers, including those provided by third party labour hire and in certain geographic locations may be more vulnerable to modern slavery, including where these workers are lower-skilled and/or temporary or migrant workers. This may include workers in areas such as aircraft and on-premise cleaning, call centre support, and catering.

Potential modern slavery risks in our supply chain



FUEL

The risk that we may be *directly linked* to modern slavery through our procurement of fuel to service our operations. Approximately 39 per cent of our total procurement spend in FY23 related to fuel, including air and ground-based fuel to service our domestic and international transport needs. While the complexities of the multi-layered fuel value chain mean the Group has minimal visibility or leverage over the extended fuel supply chain, we understand that adverse impacts could occur across the fuel supply chain, including at the extraction stage.



ICT

The risk that we may be *directly linked* to modern slavery through our procurement of ICT hardware and support services. Approximately five per cent of our total procurement spend in FY23 relates to managed service costs for outsourced services, such as end user computing, infrastructure, cloud, network, communications, mobility and application support, and project and external supplier costs for IT project development and system fees. While we undertake due diligence on our suppliers, we recognise there are heightened modern slavery risks in the ICT sector including for example the prevalence of forced labour and child labour risks deeper in the ICT hardware supply chain that can be challenging to identify and address.

Categories of products and services and the risks of modern slavery

This table outlines the key procurement categories that we have assessed may be associated with a potentially higher risk of modern slavery. This table builds on our FY22 Statement, by including fuel as a higher risk procurement category, following a deep dive of the potential adverse human rights risks associated with the fuel supply chain undertaken in the reporting period. While the complexities of the multi-layered fuel value chain mean Qantas has minimal visibility or leverage over the extended fuel supply chain, we understand that adverse impacts are likely to occur deeper in global supply chains. Our work to better understand and consider how we could be involved in these adverse human rights impacts in line with the continuum of involvement set out in the UNGPs is further outlined on page 39 and we outline our range of controls in place to manage our broader modern slavery risks in Section 4 of this Statement.

Product / Service Category	Example of Product or Service	% Total Supplier Spend	Primary Country of Spend	Source Country <sup>8</sup> in FY23 may include	Modern Slavery Risk Factors	Common Forms of Modern Slavery (hypothetical examples)
ICT	IT and Communications hardware and support desk services.	5%	Australia, USA, UK	China, India, USA	High risk geographies, Use of migrant workers, Use of seasonal labour, High risk raw materials, Use of low skilled labour	Children overseas could be exploited through the worst forms of child labour in the mining of minerals used in IT and Communications hardware.
People	Services provided by contractors/ contingent labour, including telesales and service centres.	3%	Australia, South Africa, USA	Philippines, Fiji, South Africa	Use of migrant workers, Use of seasonal labour, Use of low skilled labour	Call centre workers could be exploited through debt bondage if they are charged excessive recruitment fees by a third-party labour hire company, which they are unable to repay.
Food & Beverage	Catering – in-flight and lounges.	5%	Australia, Singapore, USA	Australia, NZ	Use of migrant workers, Use of seasonal labour, Use of low skilled labour	Fruit and vegetables used in catering meals could be harvested by migrant workers in Australia exploited through debt bondage.
Corporate Goods & Services	Apparel – uniforms for pilots, cabin crew, ground staff, engineering, freight and other. General merchandise – promotional products e.g. model aircraft.	1%	Australia, USA, Singapore	China, Hong Kong (SAR), Singapore	High risk geographies, Use of migrant workers, Use of seasonal labour, Use of low skilled labour	Apparel sourced from overseas could be manufactured by factory workers exploited through forced labour.
Inflight Goods & Services	Customer products: amenity kits, sleeper suits, blankets, pillows, headsets.	<1%	China, Hong Kong (SAR), Australia, UK	China, Thailand	High risk geographies, Use of migrant workers, Use of seasonal labour, Use of low skilled labour	Inflight goods could be transported to Australia on shipping vessels crewed by seafarers who are exploited through forced labour and may be restricted from leaving their vessels.
Fuel	Conventional and Sustainable Aviation Fuel	39%	Australia, USA, Singapore	Conventional: Singapore, Thailand, South Korea SAF: Finland, China	Use of migrant workers, Use of seasonal labour, Use of low skilled labour	Agricultural workers could be exploited through forced labour on plantations producing feedstock for SAF. Migrant workers engaged to construct an onshore oil drilling plant could be exploited through debt bondage.

KEY

- High risk geographies
- Use of migrant workers
- Use of seasonal labour
- High risk raw materials
- Use of low skilled labour

<sup>8</sup> Source country refers to the country location of the supplier address recorded in our Accounts Payable system, we recognise that the supplier may also operate in or source from other countries.

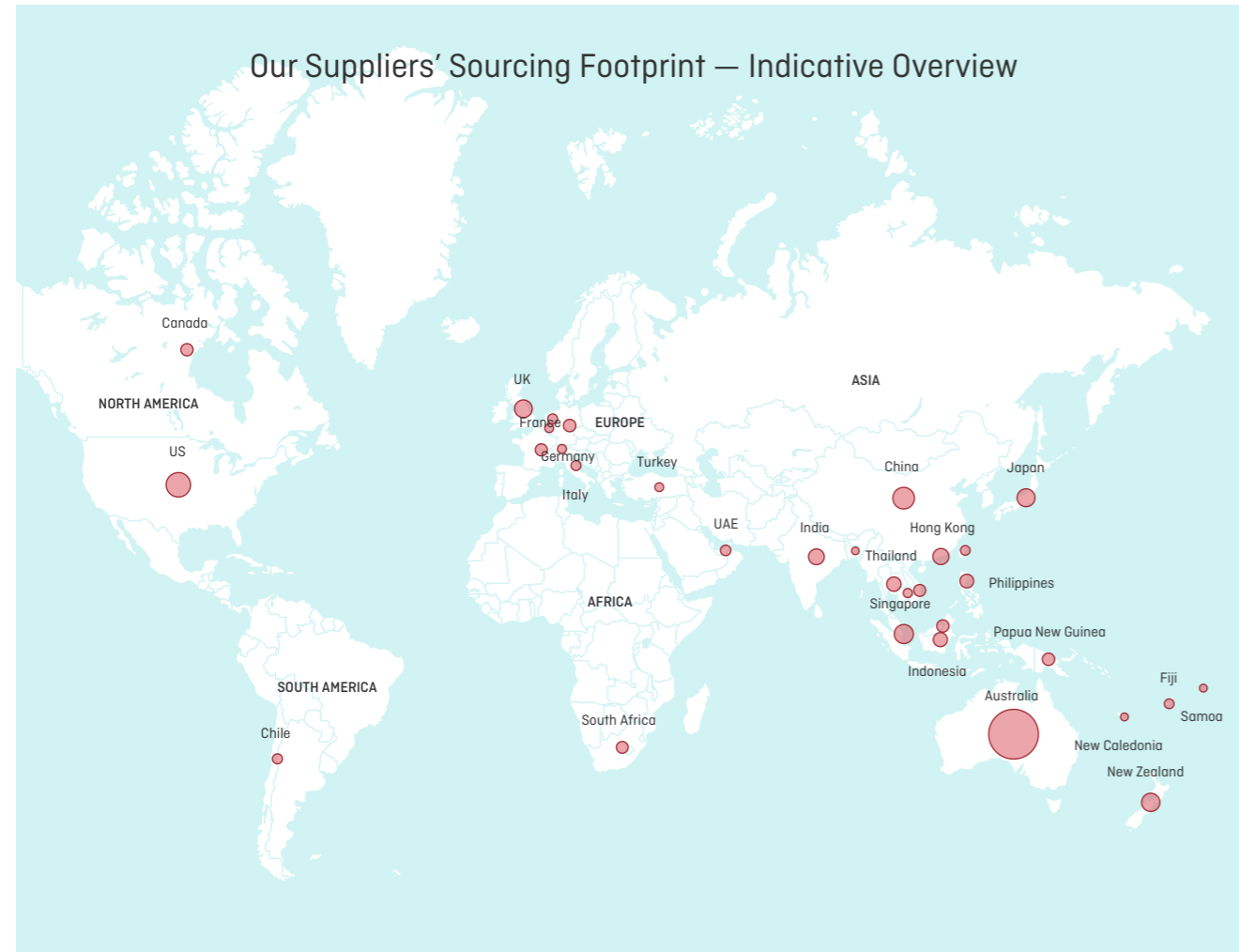
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UNDERSTANDING OUR GEOGRAPHIC EXPOSURE TO MODERN SLAVERY RISKS AT TIER TWO AND BELOW

As outlined on page 16, our tier one suppliers are located in a range of countries around the world. In some cases, these suppliers also source goods and services from third countries to support their operations and the delivery of goods and services to Qantas. Understanding where our suppliers source from supports us to understand the potential risk of modern slavery connected with the product or service being procured, and informs our broader human rights risk profile. For example, a supplier in a country reported to have a lower prevalence of modern slavery may source from a third country where the reported modern slavery risks are higher.

In recognition that modern slavery can occur at any level of the supply chain, but may be more likely to occur below tier one, as described on page 33, we collect information in our due diligence process on the countries from where products and services are delivered to the Group, which, in some instances includes third countries used by our suppliers. We have analysed the information collected to identify potential source<sup>9</sup> countries and produce the map below. The map indicates Australia remains the key sourcing country; however, it provides an illustrative example of how the geographical footprint of our supply chain expands at tier two level and below.



<sup>9</sup> Source country refers to the country/s identified across the multi-staged due diligence process and is based on information provided by the sourcing business unit or by our tier one supplier nominating the countries of their operations and/or the countries from where they will source the products or services to deliver to the Group. In some instances this may include tier two and below. This map is not intended as a complete representation of all source countries and is reliant on accuracy of information provided in the due diligence process. **Note:** This information is limited to suppliers that have triggered a potential human rights risk in our due diligence process.

## Section 4: Actions Taken to Assess and Address Identified Modern Slavery Risks

### OUR APPROACH TO MANAGING MODERN SLAVERY RISKS

The Group seeks to proactively identify, assess and address risks of modern slavery, in our operations and supply chains. This includes consideration of potential forced labour and child labour indicators in our due diligence and risk assessment processes.

During the reporting period, we did not identify any actual instances of forced or child labour in our operations or supply chains, however we understand that forced labour and child labour may be deeply embedded in global supply chains and is therefore challenging to detect. This has meant that we have not undertaken any steps to remediate identified instances of forced or child labour in our operations or supply chains. However, we understand that companies' actions to remediate specific instances of forced or child labour, as well as broader actions taken to prevent these practices occurring, may have unintended consequences for impacted families. We are continuing to build our understanding in this area, including considering how we can most effectively take into account potential impacts on vulnerable families as part of our forced and child labour risk management.

We have aligned our modern slavery response with the UNGPs and the key principles of the UN Universal Declaration of Human Rights (UDHR) and International Labour Organisation (ILO) Core Labour Standards. We are a signatory to the United Nations

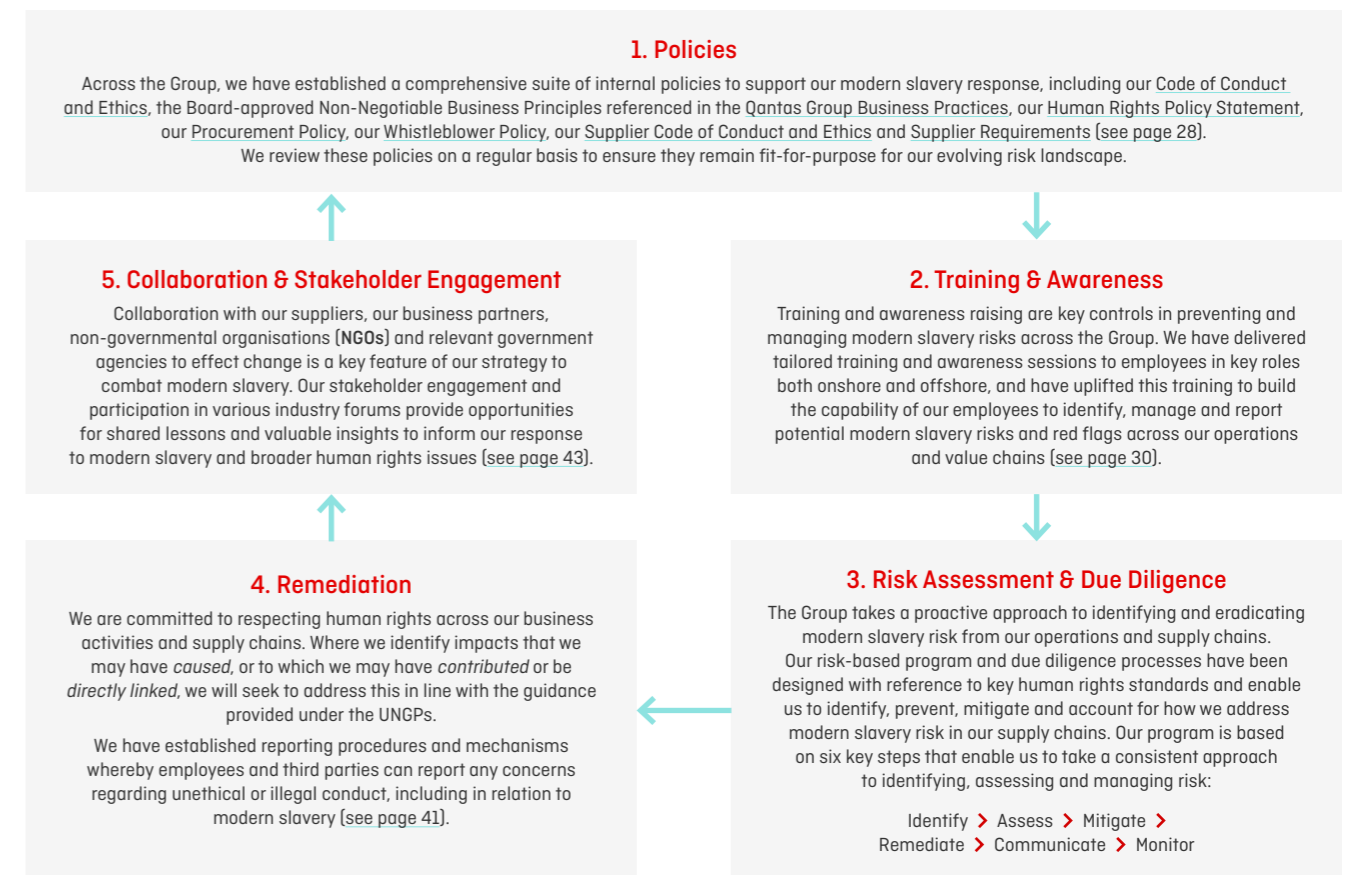
Global Compact (UNGC), the 10 key principles of which include commitments to human rights and labour rights, including the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

Our modern slavery response and actions to assess and address modern slavery risks in our operations and supply chain are based on five key foundations:

- Policies.
- Training and Awareness.
- Risk Assessment and Due Diligence.
- Remediation.
- Collaboration and Stakeholder Engagement.

While the five foundational elements which form the basis of our modern slavery response are well embedded, we are continually refining and seeking opportunities to improve our approach to managing modern slavery risk. Our work across these five foundational areas is supported by our strong governance framework.

The following sections outline our governance framework and explain our work across each of these five foundation areas. During FY21, our work to manage modern slavery risks was restricted by the necessary standdown of the majority of our employees. In FY22, we focused on strengthening our modern slavery risk management as we worked to recover from the pandemic. In FY23, we were able to further expand our approach and this section explains the key steps we have taken.





**ACCOUNTABILITY AND GOVERNANCE**

Our governance framework underpins our response to modern slavery and broader human rights risks, including by providing a clear structure for accountability. Sustainability, which includes the respect for human rights, is now one of the four key foundations for the Qantas Group, and one of the seven focus areas of our corporate strategy.

Our management of modern slavery risks in our operations and supply chains is assessed and managed consistently within our established, enterprise-wide risk framework. The Business Integrity and Compliance function leads the risk assessment, while accountability for managing the risk is embedded in the business, as described below.

The Qantas Board is engaged with and periodically briefed on the Group's modern slavery and wider human rights risk management. This includes bi-annual submissions to the Board's Audit Committee (responsible for the oversight of such risks) which provide updates on the Supply Chain Assurance program, including modern slavery risk. The Board also receives an annual Group Policy Framework update, which includes an overview from Group Business Integrity and Compliance and incorporates a global environmental scan, including human rights legislative developments, trends and themes, as well as relevant actions taken by the Group during the year. We are considering opportunities to deepen our engagement and further enhance Director education on this topic.

Further information relating to the risk management framework can be found in the Governance section of the Group's corporate website.

Qantas has established a comprehensive suite of policies to support our modern slavery response and outline our commitment to respect human rights. Our policies clearly articulate the standards we expect from our people, our suppliers and our business partners, including in relation to preventing and addressing modern slavery. This section describes our key policies relevant to modern slavery, forced labour and child labour and how they are implemented across the Group.

We are committed to continually improving and refining these policies to ensure they remain fit for purpose. During FY23, we made a range of updates to key policies to support our ongoing modern slavery risk management. These include:

- **Qantas Group Code of Conduct and Ethics:** The previous version of the Code focused on the responsibility of Qantas personnel to identify and report suspected instances of modern slavery in our operations and supply chain. Consistent with our commitment to respect human rights, we expanded this section to clarify that we expect our personnel to identify and report any potential human rights risks (not just modern slavery) that may arise through our business activities and relationships and ensure due diligence is undertaken to assess these risks. We published our updated Code of Conduct and Ethics in June 2023.

- **Supplier Code of Conduct:** We updated our Supplier Code of Conduct to further emphasise our commitment to respect human rights and our expectation that our suppliers work to implement the principles in the UNGPs. We also expanded the provisions in the Supplier Code of Conduct relating to issues such as hazardous child labour, withholding of identity documents and charging of recruitment fees, and ensuring suppliers provide channels for people to raise concerns and have access to effective remedy. The updates also underscore that we expect suppliers to implement processes to identify risks to people in their operations and supply chain and take steps to prevent and remediate any harm. The updated Supplier Code of Conduct was published in November 2022 and made publicly available on the Qantas website.
- **Supplier Requirements:** We enhanced the obligations we place on suppliers in relation to modern slavery by identifying seven core requirements for suppliers, which we also expect them to pass on to their own suppliers. These requirements relate to the use of modern slavery practices, minimum working age, withholding of identity documents, payment of wages and working hours, freedom of association, and access to grievance mechanisms. The Supplier Requirements are available on the Qantas website.

**Qantas Board**  
Responsible for oversight of the Group's corporate governance framework and ensuring responsible, ethical and sustainable business practices, including in relation to human rights issues such as modern slavery.

**Audit Committee**  
Responsible for oversight of the effectiveness of the Group's risk management and internal control framework, and the review and monitoring of risk management programs, including in relation to human rights issues such as modern slavery.

**CEO and Group Leadership Team**  
Responsible for the endorsement and leadership of the Group's strategy to address human rights issues such as modern slavery.

**Supply Chain Assurance Leadership Council**  
Responsible for oversight of the effective implementation of the Supply Chain Assurance program, including modern slavery risk management and escalations. Key members include: Chief Financial Officer, General Counsel and Group Executive Office of the CEO, Chief Financial Officer for Jetstar Group, and other senior leaders responsible for the risk areas within scope of the Supply Chain Assurance program. This Council was re-established during FY22 and was formerly called the Supply Chain Assurance Steering Committee.

**Supply Chain Assurance Working Group**  
Responsible for driving work to optimise supply chain risk management, including modern slavery, delivered via the Supply Chain Assurance program. The working group is chaired by Group Procurement and members include risk subject matter experts (SME) in the areas of Corruption, Modern Slavery, Environment, Privacy, Cyber Security and Work Health & Safety.

**Business Integrity and Compliance**  
Responsible for setting the strategy and leading the Group's modern slavery program on a day-to-day basis, and providing SME advice on human rights issues, including modern slavery risk management. Reports to the General Counsel and Group Executive, Office of the CEO.

**Business Units**  
Accountable for implementing actions to address modern slavery and other human rights risk is cross-functional across the different business areas of the Group. Business units are responsible for identifying and reporting potential modern slavery risks and managing modern slavery risks relevant to their business area, with support from Business Integrity and Compliance. Group Procurement supports any supplier contractual escalations.

Policy	Relevance to Modern Slavery	How we implement this Policy
<b>Human Rights Policy Statement</b>	The Human Rights Policy Statement provides the foundation of our approach to human rights and ensures our employees understand the standards set for the Group. It also outlines the standards we expect of those in our supply chain and our business partners. The Human Rights Policy Statement explicitly prohibits engaging in child labour and forced, bonded or compulsory labour, or any other form of modern slavery. It highlights that where we identify that we have caused, contributed or are directly linked to adverse human rights impacts, we will seek to address, remediate or co-operate with remediating these impacts in line with our commitments under the UNGPs.	The Human Rights Policy Statement is publicly available on the Qantas website and published on internal communication platforms. The Statement encourages reporting of any concerns regarding unethical or illegal conduct, including in relation to human rights. Reports can be made internally through established reporting channels, as well as through the Whistleblower program.
<b>Qantas Group Code of Conduct and Ethics</b>	The Qantas Group Code of Conduct and Ethics is our principal corporate governance policy. It is approved by the Qantas Board and governs the conduct of our personnel. It outlines the minimum requirements and responsibilities necessary to achieve the Non-Negotiable Business Principles. Relevant to modern slavery, the Code of Conduct and Ethics outlines our rejection of any form of modern slavery (which includes forced labour and child labour) or labour exploitation in our operations and value chain and includes requirements for personnel to conduct the business of the Group with the highest level of ethics and integrity, and to respect and support human rights.	The Qantas Group Code of Conduct and Ethics is publicly available on the Qantas website and is published on internal communication channels. We also provide training to our employees on the Code of Conduct and Ethics upon onboarding and as part of our ongoing mandatory training framework. Any identified breach of the requirements set out in the Code of Conduct and Ethics will be investigated and may result in disciplinary action.

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Policy	Relevance to Modern Slavery	How we implement this Policy
<b>Board approved Non-Negotiable Business Principles, referenced in the Qantas Group Business Practices Document</b>	The Business Practices Document provides an overview of our behaviours, values and business practices and highlights the standards to be upheld by all personnel. The eight Non-Negotiable Business Principles include commitments relevant to modern slavery, such as proactively managing risks and acting with honesty and integrity and upholding ethical standards. The Business Practices Document includes a specific section on respecting human rights, including by rejecting forced, bonded or compulsory labour, and that we condemn all forms of exploitation of children and support the elimination of exploitative child labour, and expect that our people consider our risks of involvement in actual or potential human rights impacts and report potential risks to Business Integrity and Compliance. We reviewed the Business Practices Document during the reporting period to reflect broader policy changes and help ensure it remains fit for purpose.	The Business Practices Document is publicly available on the Qantas website and is published on internal communication channels. Any identified breach of the requirements set out in the Business Practices Document will be investigated and may result in disciplinary action.
<b>Whistleblower Policy</b>	The Whistleblower Policy outlines the operation of the Qantas Whistleblower program. This includes information about how to make a disclosure, which could potentially include modern slavery-related complaints	The Whistleblower Policy is publicly available on the Qantas website and published on internal communication channels. Tailored training is provided to those involved with the program, and information regarding the policy is embedded in numerous training courses, including those provided upon onboarding and as part of our ongoing mandatory training framework.
<b>Supplier Code of Conduct</b>	The Supplier Code of Conduct establishes our expectations of suppliers, and their supply chain, in providing goods and services to the Group. This includes our expectation that suppliers ensure that no forced labour, involuntary labour, or child labour is used. We also require our suppliers to take measures to verify that all workers are of legal age and ensure that no person under the age of 18 undertakes hazardous work that would likely jeopardise the physical or mental health, safety or development of the person. We published our updated Supplier Code of Conduct in November 2022, which included clear articulation of our expectation for suppliers to respect human rights, and prohibit all forms of modern slavery, and further detailed our expectations in regard to labour standards such as wages, mandatory benefits and prohibition of withholding of workers' identity documents, and charging of recruitment fees.	Our Supplier Code of Conduct is published on the Qantas website. We expect our suppliers to ensure the Supplier Code of Conduct is communicated to all their sub-contractors, in the local language and in a manner that can be understood. Supplier compliance with the Code of Conduct may also be assessed through audits and self-assessments. Any potential breaches are investigated by Qantas and may result in a range of actions, up to and including suspending provision of services by the supplier.
<b>Supplier Requirements</b>	The Supplier Requirements apply to all suppliers and set out the standards we expect from suppliers and their personnel (including their sub-suppliers). The Supplier Requirements impose a range of legally binding obligations on suppliers, including a requirement not to use child and/or forced or involuntary labour or permit the trafficking in persons for the purposes of forced labour; and that the Supplier not employ children who are younger than 15 years of age or who fall below the local legal minimum working age, whichever age is the highest. As outlined above, we updated our Supplier Requirements during the reporting period.	The Supplier Requirements are publicly available on our Corporate site and are communicated to suppliers during the onboarding process. Our standard contract clauses require suppliers to comply with the Supplier Requirements, as well as our Group Compliance Statement, which includes specific modern slavery clauses. Any potential breaches are investigated by Qantas and may result in a range of actions, up to and including suspending provision of services by the supplier.

**MODERN SLAVERY TRAINING AND AWARENESS**

Training and awareness-raising are core components of our approach to managing modern slavery risks. During FY23, we continued to refine and expand our training and awareness approach for both our people and our suppliers.

**GENERAL AWARENESS TRAINING**

All Group personnel must complete general human trafficking awareness training when they join the Qantas Group and on a periodic basis. We developed this training using guidance material for airlines about human trafficking, produced by the International Air Transport Association (IATA). Key content includes an overview of how human trafficking is relevant to airlines and an explanation of human trafficking red flags. In FY23 we also undertook awareness raising activity to coincide with World Human Trafficking Day, releasing Group-wide communiques across a variety of channels. We also worked with our Cyber-Safety team to raise awareness of the intersection of technology and trafficking in persons, including methods used by cyber criminals to traffic and exploit people via online channels.

**TARGETED TRAINING FOR PROCUREMENT**

In addition to our general training, we provided a targeted modern slavery training session to members of our Group Procurement Function. This ~45 minute session was attended by approximately 50 procurement staff. Content included an overview of modern slavery, an explanation of Qantas' requirements for suppliers around modern slavery, key supply chain red flags, and practical guidance to support engagement with suppliers. A post training survey identified that 62% of respondents learned something new about modern slavery (comments referenced the spectrum of what constitutes modern slavery and surprise regarding the prevalence and nature of modern slavery risk in Australia) and indicated the training material was very relevant to their role and would be valuable in supporting them in their role.

**TAILORED TRAINING FOR JETSTAR ASIA STAFF**

Our extensive geographical footprint means some team members may be located in regions where there is a comparatively higher reported prevalence of modern slavery. During the reporting period, we provided a tailored modern slavery training session to Jetstar Asia staff. The 1.5 hour session was attended by approximately 40 participants, including the Jetstar Asia CEO and leadership team as well as staff in operational roles. The session provided an opportunity to discuss key modern slavery red flags, as well as issues such as challenges undertaking supplier due diligence in certain contexts (see case study on page 37).

**FACE-TO-FACE TRAINING FOR AIRCREW**

In FY23, we continued the roll out of face-to-face training on human trafficking risks to coincide with the resumption of our flying operations and the return to work of our people. This training focuses on building awareness of indicators of human trafficking, to help our cabin crew and pilots recognise potential trafficking victims who may be travelling passengers and to apply victim-centred response protocols. The training occurs on an initial and recurrent basis at periodic intervals. Since the implementation of the training in FY22, approximately 13,460 of our people (cabin crew and pilots) have completed the face-to-face training.

**E-LEARNING MODULE**

During the reporting period we finalised content for a new modern slavery e-learning module. We developed this training internally to help ensure it is specifically tailored to our operating context.

The module forms part of a wider compliance training program and includes information about types of modern slavery practices including forced and child labour and their prevalence, groups who may be vulnerable to exploitation, and how to spot and report modern slavery red flags. The module also includes a series of knowledge check questions, including the examples on the following page.

During FY24, the training will be made available to all employees via our Workday learning system.

**SUPPORT FOR OUR SUPPLIERS**

We engage with selected suppliers to support them to build their understanding of modern slavery and broader labour rights issues, this included both virtual and on-site engagement. For example, during FY23 we visited two supplier sites in Thailand (see case study on page 35) and one in Europe. As part of these supplier visits, we engaged with factory owners and managers to raise awareness of issues such as working hours and recruitment fees and our stance in relation to both.





**MODERN SLAVERY E-LEARNING: HYPOTHETICAL SCENARIOS**

Hypothetical real world scenarios can play a key role in helping training participants understand and apply the material to their workplace contexts. The examples below form part of our modern slavery e-learning module, which we developed during the reporting period.

You work in Procurement and are visiting a supplier who is looking to provide products to the Qantas Group. You learn that the suppliers' workforce is largely made up of migrant workers from various countries across South East Asia and that they are housed onsite in accommodation provided by the supplier and all meals are provided. You are quite proud as you have managed to get the supplier to lower their costs by a reasonable amount and the product and price now match what you are looking for in the deal and you are ready to award the contract.

**? What should you do?**

You work for Jetstar, checking in passengers for international flights. Two passengers arrive to be checked in. One of the passengers is holding both passports and is answering all the questions on behalf of both passengers. When you ask the second passenger a direct question, she answers in what appears to be a rehearsed way. You're suspicious the second passenger could be a victim of human trafficking.

**? What should you do?**

You work flexibly and today leave the office at 8pm. On your way out, you notice a young child alone in the lobby. You can see that the child is wearing a uniform for a cleaning company.

**? What should you do?**

You work in Cabin Crew and while waiting to board a flight home, you get chatting to a local who provides services to the Qantas Group at that airport. They tell you that they're having issues with their employer and they haven't been paid their overtime or superannuation for over a year.

**? What should you do?**



**RISK ASSESSMENT AND SUPPLIER DUE DILIGENCE**

The Group takes a proactive approach to identifying and managing modern slavery risks in our operations and supply chains through our risk assessment and supplier due diligence processes.

Our Supply Chain Assurance program, launched in 2018, is led by Group Procurement and standardises the way that the Group identifies, assesses and manages modern slavery risks in our supply chains. Importantly, this program helps us to understand how our suppliers are producing or sourcing the goods and services we procure, and enables us to make an informed assessment as to suppliers' human rights standards, practices and management of modern slavery risk, including identification of potential forced labour and child labour indicators in their operations.

We recognise that the most significant risks of modern slavery including forced labour and child labour may be present at tier two or below in our supply chain, where we have less visibility of working conditions and sub-supplier practices. Our established due diligence processes ensure that, for procurement categories which we have assessed as being associated with a higher prevalence of potential modern slavery, we look beyond tier one. For example, where a supplier may provide inflight products, such as amenity kits, headsets, sleeper suits or blankets, we perform due diligence on the tier one supplier and the tier two (or below) manufacturer, including requiring the source manufacturer to provide a social audit report. This enables us to assess the standards, practices and working conditions of the factory where the products are manufactured, even where we do not hold a direct contract with the source manufacturer.

During FY23, the number of suppliers assessed via the Supply Chain Assurance program more than doubled compared with FY22, this being attributable to a range of factors including:

- Our increased procurement spend arising from the resumption of services and expansion of operations and business activity across FY23.
- The continued work of, and investment in, the dedicated project team led by Group Procurement, to progress the program of work to assess suppliers who previously had not been subject to assessment (see page 35).
- The review of and changes to some risk triggers in certain procurement categories bringing a wider range of suppliers in scope for assessment.

This has resulted in a natural increase in the volume of supplier risks triggered, and we will continue to monitor the impact of this expanded scope on the program, to ensure that we are continuing to prioritise our efforts to focus on those areas that may have a higher prevalence of modern slavery, and also consider our leverage to influence sustainable change.

During FY23, we evaluated five new suppliers as medium risk; however, in the same period, we re-evaluated 11 suppliers previously assessed as medium risk to low risk, following implementation of corrective actions and other control environment improvements or, in some instances, where sourcing activity ceased. Regarding these supplier ratings, none of the medium ratings were due to potential forced labour or child labour risks. Our risk assessment process is not static and reassessment of risk may occur at varying intervals in response to information provided (e.g. provision of audit reports, or evidence of completion of corrective actions), changes in the control environment, or other external factors.

**Supply Chain Assurance Statistics for FY23**

2,600+ <sup>10</sup> Suppliers assessed through Supply Chain Assurance program	926 Suppliers subject to preliminary risk assessment	94 Suppliers progressed to advanced due diligence/desktop review
5 <sup>11</sup> New suppliers assessed and monitored as medium risk	11 <sup>12</sup> Suppliers reassessed from medium to low risk	16 <sup>13</sup> Suppliers monitored at medium risk 30 June 23

<sup>10</sup> This number includes both parent and child entities, and includes new and recontracting suppliers, as well as some suppliers assessed through the Unassessed Supplier Project (refer page 35).  
<sup>11</sup> Currently there are zero suppliers at tier one in our supply chain assessed as having a residually high modern slavery risk.  
<sup>12</sup> This number includes suppliers that were assessed as medium and subsequently reassessed in the reporting period following the completion of corrective actions, or new information that enabled a re-evaluation of the risk profile.  
<sup>13</sup> This is the total number of suppliers assessed as medium risk and includes suppliers assessed both within and outside this reporting period.



OUR MODERN SLAVERY RISK ASSESSMENT AND SUPPLIER DUE DILIGENCE ECOSYSTEM

Our modern slavery risk assessment and supplier due diligence ecosystem have been designed to align with our broader, Group-wide risk management framework. This alignment helps to ensure consistency in the application and common understanding of risk management across the Group. The six key pillars – identify; assess; mitigate; remediate; communicate; and monitor – are well embedded and, collectively, form our approach to managing human rights risk within our supply chain. These six pillars are outlined below.

**1 IDENTIFY**

The initial supply chain assessment includes questions that assess key modern slavery risk criteria, such as the location(s) where the product or service is both manufactured and provided, the sector, the category of product or service and how it is to be used by the Group. Where a potential human rights risk is identified (including in relation to modern slavery), our Group Procurement team enters the supplier details into our third-party technology platform (Exiger) and the supplier risk is referred to the Business Integrity and Compliance risk SME for triage. We utilise a range of tools to strengthen our risk assessment program, including indices

from reputable third-party providers and the Global Slavery Index and Exiger draws on a variety of data feeds including corporate records (e.g Lexus nexus, Buerau Van Dijk), regulatory sources, watchlists (e.g world compliance, info4c) and open web or media paywalled content, all of which inform our broader assessment. We also consider information and resources made available through organisations such as the Global Compact Network Australia, the Transparency International Corruption Perceptions Index, and the UK Government Modern Slavery Registry.

**2 ASSESS**

Exiger has been designed to assess potential human rights risks by applying weighting and scoring methodology against universally recognized human rights risk indices (such as civil and political rights, labour standards, access to remedy and business integrity), tailored to our operating environment. The initial assessment of risk is based on three key inputs: the responses to the initial triage questionnaire described in the previous step; the output of Exiger’s negative screening capability; and a subsequent preliminary risk assessment which is completed by the sourcing business unit. Where a potential modern slavery risk is evaluated as medium or above, or where deemed appropriate due to the potential risk (for example this may include instances where the risk model has returned a low risk, but the product or service may be in a procurement category we consider as being associated with a potentially higher risk of modern slavery), the supplier is subjected to a modern slavery desktop assessment. This assessment is undertaken by a modern slavery risk SME in the Business Integrity and Compliance function and requires the supplier to answer more in-depth questions in respect of its operations, including the countries and site/s from

where the product or service is manufactured or provided. Our DDQ asks specific questions in relation to the ages of workers and whether children are permitted onsite and also includes questions on employment practices such as whether workers are required to pay deposits associated with their employment or whether the Supplier holds identification documentation (passports, visas, identity cards) on behalf of workers. The supplier is required to provide supporting evidence, such as relevant internal policies and procedures, independent site/factory audit reports and evidence of labour practices (overtime, wages, worker conditions). In some instances, the Group will sponsor an independent audit of the supplier’s operations or undertake a site visit (see page 35). In some countries, we may experience challenges working with suppliers to complete our supply chain assessment questionnaire due to language and cultural barriers. Geopolitical factors may also affect suppliers’ willingness to engage with us. The due diligence case study on page 37 outlines examples of how we approach due diligence in challenging contexts.

**3 – 5 MITIGATE / REMEDIATE / COMMUNICATE**

In line with the UNGPs, we favour working with suppliers to resolve or substantially mitigate issues identified through our risk assessment and supplier due diligence processes. We recognise the importance of using our leverage to drive change to supplier practices and understand that immediately ending supplier relationships can have potential adverse effects on the livelihood of the supplier’s employees and the most vulnerable

families. Achieving change in supply chains takes time, is not always a linear process and can be complex, which is why we seek to share our expertise to support suppliers to build their capability to meet international standards, including in relation to modern slavery (see the case study on page 36). Further information about our Group specific remediation processes is set out in the following section.

**6 MONITOR**

Suppliers that are referred to Exiger and subsequently approved for onboarding, are subjected to continuous monitoring regardless of risk rating. This monitoring activity provides auto-generated alerts of any publicly available negative news screening across a range of categories that

include human rights violations, corruption, legal breaches and allegations of misconduct. This enables us to review and, if necessary, undertake appropriate action with the supplier in a timely manner.

**MONITORING RISK IN OUR SUPPLY CHAIN: COTTON**

Cotton is a commonly used fibre in our uniform apparel items as well as other inflight products such as sleeper suits, linen, blankets and pillows. Although our spend on these items is only approximately two per cent of our overall annual procurement spend, we know that spend is not an indicator of potential modern slavery risk. As part of our ongoing monitoring of suppliers, we scan external sources for potential changes in operating risk. In the reporting period, the Australian Government issued a Ministerial Statement in relation to the findings of the Office of the High Commissioner for Human Rights’ (OHCHR) report on the Xinjiang Uyghur Autonomous Region<sup>14</sup>.

Whilst none of the factories manufacturing products for Qantas are located in the Xinjiang Uyghur Autonomous Region,

in response to the Ministerial Statement we proactively engaged our key apparel and textile suppliers to reaffirm that none of the raw materials it processes originates from this region. This activity also served to reaffirm our expectations of supply partners in relation to sustainable sourcing and, in some instances, provided us an opportunity to learn more about our suppliers’ approach to managing potential modern slavery risks associated with cotton and other raw materials. For example, one of the suppliers identified it is monitoring research and analysis by credible third-parties to support it to track and manage risks relating to state-sponsored forced labour, and to refine its risk assessment and due diligence processes to address these risks.

<sup>14</sup> Qantas acknowledges that these findings are opposed by the Government of the People’s Republic of China who issued a response which was released together with the OHCHR report.



**ASSESSING MODERN SLAVERY AND BROADER HUMAN RIGHTS RISKS RELATING TO OUR UNASSESSED SPEND**

When launched in 2018, our Supply Chain Assurance program focused on assessments of all new and re-contracting suppliers managed through our central procurement function. To date, more than 10,000 assessments have been performed across our supplier base.

In FY22, we worked to identify and review unassessed suppliers onboarded prior to 2018. Our Procurement team, Risk SMEs and the Supply Chain Assurance Working Group collaborated to develop a segmentation model to prioritise assessments of these suppliers, which drew on key criteria such as country, category, value of spend and tenure with the Group. A cross-functional project team was subsequently established in April 2022, to assess these suppliers, with an initial focus on the higher priority suppliers identified using the segmentation model. The project team is supported by an external consultancy firm.

This specialised program of work continued throughout FY23, during which the team assessed approximately 1,000 high priority previously unassessed suppliers. These assessments triggered over 350 potential human rights risks, of which approximately 240 suppliers were subject to a form of further assessment, in line with our risk-based approach. This included undertaking advanced due diligence via desktop review of suppliers in procurement categories such as corporate goods and services (e.g. branded items for promotional purposes such as model aircraft, cups and apparel), inflight goods and services (e.g. rotatable galley insert equipment such as waste bins and aluminium foil trays) aircraft equipment and maintenance (such as aircraft spare parts and maintenance services) and freight (e.g. freight forwarders and logistics).

The program is continuing in FY24, where the focus is now on assessing the remaining unassessed suppliers. The Supply Chain Assurance Leadership Council is continuing to provide oversight of this work, with the outputs also reported to the Board Audit Committee and the Board.



**ENGAGING WITH OUR SUPPLIERS THROUGH SITE VISITS**

Visiting suppliers' sites provides us with valuable opportunities to understand their operations on the ground and build relationships with key staff. Our supplier site visits are not audits and we recognise that the pre-announced nature of these visits means suppliers have an opportunity to prepare for our visit.

We continued to prioritise direct engagement with selected suppliers to better understand modern slavery risks in our supply chain during FY23. We conducted site visits to two "Tier 2" suppliers in Thailand and a direct supplier located in Europe to understand their modern slavery risk management and build their capacity, including by undertaking awareness-raising activities, (e.g., the corporate responsibility to respect human rights in line with the UNGPs and the Dhaka Principles for Migration with Dignity), as well as emphasising our own expectations outlined in our Supplier Requirements and Supplier Code of Conduct, and discussing the importance of access to trusted grievance mechanisms.

The site visits to the Tier 2 suppliers in Thailand were undertaken by representatives from our Business Integrity and Compliance team and our Inflight Services team. The first supplier site uses migrant workers from the region and our visit provided an opportunity to engage with the supplier face-to-face at factory-owner level about the recruitment agency it uses, as well as ascertain information on the recruitment agency in the origin country and discuss potential risks in this area. We obtained copies of the factory's agreement with its recruitment agency, its approved Government application to hire foreign workers, various documents outlining transactional services and fees, as well as viewing a number of worker contracts and obtaining a copy as an example. The second site did not use migrant workers; however, advised they may utilise labour hire agencies to support local recruitment activities. Our engagement with the factory manager focused on recruitment practices, and issues such as working hours. We viewed relevant documentation onsite and obtained copies of some documents from the supplier. We are analysing the documentation provided by both suppliers and anticipate further engagement with these suppliers in FY24. These site visits supported us to contextualise our risk management approach and provided valuable insights into the on-the-ground practices of our tier two suppliers, including practices that may be legally permissible under local law, but may conflict with other standards or our own Supplier Requirements. The face-to-face engagement enabled us to spend time exploring these practices in a collaborative and sensitive way, and build trust and commitment to further engage with the suppliers. We will continue to work with our tier one and tier two suppliers, as well as other stakeholders as appropriate, to better understand these issues.

The site visit in Europe was to visit both the headquarters of a key global supplier as well as one of their factories. This visit provided us with an opportunity to engage with senior leaders of the company, including to better understand their human rights policies and broader approach to human rights risk management both within the company and their supply chains and also to reaffirm our own expectations of our suppliers. At the factory, we observed how technology and automation had been introduced, which ultimately supported a reduction in labour and overall working hours.

**CASE STUDY UPDATE: ENGAGEMENT WITH SUPPLIER**

In our FY22 Statement, we outlined our engagement with a supplier to address a range of issues identified during a social audit of a factory manufacturing headsets. This included providing guidance on development of a workforce capacity plan to reduce overtime levels, as well as methods to manage and monitor regular working hours. During the reporting period, we learned from our supplier that despite the capability building activity and initial positive improvement in overtime levels at the factory, there had thereafter been an upward trend in overtime levels. We engaged with the supplier to understand the contributing factors, and our supplier explained that as the opportunity for workers to work overtime (and earn more money) decreased, this had led to some workers choosing to leave for alternate employment and that while remaining workers were voluntarily working more overtime, the overtime was not excessive. Listening to our supplier, highlighted three key learnings: the challenges suppliers may face when agreed actions to address issues

may have other consequences; that achieving change is not always a linear process; and the importance of contextualising a response to any potential areas of risk, for example in this instance the impact of the pandemic related labour shortages coincided with efforts to reduce overtime. During our ongoing engagement with the supplier in FY24 we learned that the overtime levels are again improving, and we will continue to monitor this situation with our supplier.

Our engagement with this supplier has also included providing education on emerging global legislative developments, and the newly recognised Universal Human Right to a clean, healthy and sustainable environment and what this could mean for businesses. Our supplier continues to demonstrate a willingness to learn and also share their learnings with others in the value chain, for example the supplier expressed they would like to share learnings from our discussions on social responsibility (which included modern slavery risk management) with other airlines.





**UNDERTAKING DUE DILIGENCE IN CHALLENGING CONTEXTS**

As an international airline, we have a complex and diverse global footprint. We operate across a range of countries, engage a wide array of suppliers around the world, and partner with other airlines flying to over 1,300 destinations.

We work to apply our due diligence processes to these different contexts, to help us manage modern slavery and broader human rights risks. In some cases, this requires us to tailor our processes to respond to challenging contexts relating to our countries of operation, our suppliers, and our business partners.



**DUE DILIGENCE ON POTENTIAL COUNTRIES OF OPERATION**

Before commencing a new international route, we undertake detailed risk assessments and planning which cover a range of issues. Where appropriate, this can include consideration of modern slavery and broader human rights risks. For example, during the reporting period we made a decision not to proceed with opening an international route for one of our Group airlines, and although not the sole determining factor, the decision considered the human rights context in that country. Assessing the human rights implications of new routes can be challenging and we recognise that potential positive human rights impacts cannot offset potential negative human rights impacts. For example, flying into a higher risk country may contribute to the flow of goods and people to and from the country but our footprint may affect existing human rights impacts, or expose stakeholders to potential risks. The extent of our footprint in countries can also vary significantly, which may affect relevant human rights risks. For example, in some instances we may have a high volume of flights, operate crew hubs and engage personnel on the ground to support our operations. In other instances, our presence may be much lower, for example where we operate low volume services or the port is a recognised diversion location only. In recognition that the social, economic and geopolitical context of countries are fluid and change over time, we monitor, review and may adjust our operational footprint as circumstances change.



**DUE DILIGENCE ON OUR SUPPLIERS**

We have a standardised supplier risk assessment process which facilitates the consistent application of our due diligence processes. However, in some circumstances we experience challenges in engaging with certain suppliers being unwilling to participate in our standard process. In such instances, we may need to adapt and tailor our approach. For example, we may look at alternate sources of information including exploring company record registers and may undertake targeted and context specific modern slavery risk related due diligence geopolitical with the sourcing business unit. During the reporting period, we also translated our Supplier Code of Conduct and third-party modern slavery due diligence questionnaire into a prominent foreign language used by a number of our suppliers. Whilst some of the suppliers still declined to complete the questionnaire, following the translation of our Supplier Code of Conduct, these suppliers agreed to sign a declaration to comply with the requirements in the Code.

During the reporting period, we revised our DDQ to further tailor the questions to our modern slavery risk profile. For example, we significantly expanded the number of questions asked about subcontracting and recruitment agencies, which we recognise can pose modern slavery risks. We also included specific questions relating to issues such as translation of contracts into languages understood by workers and expanded questions relating to forced and bonded labour, as well as child labour to include questions on age verification processes and access to grievance channels. We will continue to implement the revised DDQ over FY24.



**DUE DILIGENCE ON OUR BUSINESS PARTNERS**

Securing effective results from due diligence on business partners can be challenging, including where we may have limited leverage. During the reporting period, we designed and piloted a revised approach to due diligence with a prospective airline partner to help us better understand potential modern slavery and broader human rights risks relevant to the airline's business activities and relationships. As part of this process, we explained our commitment to human rights and asked the prospective airline partner to respond to a series of questions about its human rights risk management. This included questions about whether the prospective airline partner has a human rights policy and the steps it takes to implement the policy, as well as questions about its human rights due diligence processes and potential human rights risks associated with its business activities, such as modern slavery and human trafficking. We also considered third party reporting about the modern slavery and broader human rights risks associated with the airline's operational footprint. This activity highlighted that adopting a tailored approach in certain circumstances can support more effective risk management, including by identifying potential human rights risks and impacts relevant to the specific nature of a partnership (per the UNGPs continuum of involvement). We will look to incorporate the learnings from the alternate due diligence process in future assessments involving business partners (as opposed to suppliers).

**REFRESHING OUR SALIENT HUMAN RIGHTS ISSUES**

Qantas is committed to respecting all internationally recognised human rights. As part of this commitment, we work to identify and address any involvement we may have in actual and potential human rights impacts across our operations and value chain.

As an international airline group, we have a diverse global footprint. We recognise the importance of undertaking effective human rights due diligence, including for our operations, business partners and suppliers in higher-risk environments. We also understand that at-risk and vulnerable groups may be particularly affected by adverse human rights impacts.

We completed our first salient human rights assessment in 2018, and across FY22 and FY23 we engaged an independent business

and human rights advisory firm to undertake a review of our salient human rights issues. Our salient human rights issues are the areas where we consider the most severe adverse human rights impacts could occur across our business activities and relationships. The review involved a Group-wide, cross-functional workshop to identify potential examples of relevant adverse human rights impacts, the themes of which were subsequently validated in a series of internal stakeholder consultation sessions. We then worked with Pillar Two to assess the indicative severity of these potential adverse human rights impacts by evaluating their scale, scope and remediability in line with international standards and frameworks. This work informed the identification of five salient human rights issues for Qantas, which we aim to use to help us focus our human rights risk management.

**Our Salient Human Rights Issues**



**RESPECTING LABOUR RIGHTS IN OUR SUPPLY CHAINS**

We source a range of products and services to support our business from diverse and complex global supply chains. We understand that supply chain workers can be vulnerable to a range of human rights impacts, including modern slavery. We set clear expectations for our direct suppliers and have processes to assess supplier risks and respond to modern slavery incidents and allegations. While this is a complex area, we are also working to better understand our broader value chain.



**PRESERVING A CLEAN, HEALTHY AND SUSTAINABLE ENVIRONMENT**

We are committed to minimising our impact on the planet – in the air and on the ground – so that future generations can continue to experience the wonder of travel. We recognise human-induced climate change is a significant issue for the aviation industry and we are committed to supporting the aims of the Paris Agreement to reduce global emissions. We seek to reduce our impact on the planet and local communities through our de-carbonisation efforts and by managing our waste and protecting against pollution.



**SECURING CUSTOMER AND STAFF PRIVACY**

We understand that how we use and manage the personal data of customers and staff matters. The aviation sector is dependent on data, systems and networks and we operate in an environment of ever-evolving cyber threats. We work to ensure customer and staff data is handled fairly, ethically and responsibly and that we maintain the security and value of this personal information.



**SAFEGUARDING CUSTOMER SAFETY AND WELFARE**

As an airline, safety is core to all that we do. We seek to safeguard the safety and welfare of our customers at all times, both in the air and on the ground. We also aim to treat everyone with respect and dignity and understand that people using our services have diverse needs and backgrounds.



**PROVIDING SAFE, RESPECTFUL AND INCLUSIVE WORKING ENVIRONMENTS FOR OUR PEOPLE**

Our people are the core of our business and we focus on enabling them to be and do their best in a safe and inclusive culture. We are committed to the safety of our people at all times. We also value our people's diverse lived experience and support inclusive and respectful work environments through action in areas such as gender equity, reconciliation and LGBTI+ inclusion.



**ASSESSING MODERN SLAVERY AND BROADER HUMAN RIGHTS RISKS IN OUR FUEL VALUE CHAIN**

As an airline, we rely on aviation fuel to operate. We source two forms of aviation fuel. Conventional fuel is derived from petroleum based products, while sustainable aviation fuel (SAF) is produced using feedstock such as canola oil.

Importantly, the sourcing of aviation fuel in both these categories involves complex global value chains which pose a range of challenges to assessing and managing potential human rights risks, such as modern slavery. For example, it can be difficult to achieve visibility of the conventional aviation fuel value chain past refinery stage, due to the potential blending of crude oil extracted from different geographies. Similarly, the co-processing of feedstock by SAF providers can complicate efforts to identify the supply chains involved. Both categories of fuel may also be co-mingled in airport storage tanks with fuels sourced by other airlines.

During the reporting period, we worked with an independent specialist business and human rights advisory firm to undertake a deep dive review of potential adverse human rights impacts

involved in both the conventional fuel and SAF value chains, including modern slavery. Through this process, we identified 10 key areas where potential adverse human rights impacts could occur. These areas include the labour exploitation of workers involved in activities such as shipping, the production of feedstock, and the construction and operation of oil facilities. We also identified other areas where potential human rights impacts could occur, including in relation to the environment and impacts on local communities in the supply chain.

For each of these 10 areas, we undertook desktop research to understand the evidence base for how adverse human rights impacts could occur and considered how we could be involved in these adverse human rights impacts in line with the continuum of involvement set out in the UNGPs.

Going forward, we are using the results of this work to inform our human rights risk management across our fuel value chain, including incorporation of human rights related questions in due diligence questionnaires associated with our SAF investment activity. We are also exploring opportunities for collaboration with stakeholders to progress joint approaches.



**REPORTING AND REMEDIATION**

We value a *speaking up culture* where our people and our suppliers feel safe to raise concerns about modern slavery and other human rights issues.



**OUR COMMITMENT**

We are committed to respecting human rights across our business and supply chains.

As set out in our [Human Rights Policy Statement](#), where we identify adverse human rights impacts (such as modern slavery) that we may have *caused*, or to which we may have *contributed*, we will seek to address these impacts in line with the guidance provided under the UNGPs, including by providing for or cooperating in remediation. We also recognise we may play a role in remediation where we identify that we are *directly linked* to an adverse human rights impact.



**OUR PROCESSES**

We have established reporting procedures and mechanisms where employees and third parties (including suppliers and their workers) can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery and the use of forced labour or child labour. Employees can report to their manager or, if they wish to remain anonymous, employees and third parties (including suppliers and their workers) are able to report through our independently-managed Whistleblower channels, via phone and email, via our online portal, or by contacting an eligible recipient as named in our Whistleblower Policy. If we receive a modern slavery-related complaint through these processes, we will investigate the report applying our Modern Slavery Incident Response Principles and Guidelines, which draw on the expectations set out in the UNGPs (see page 41) (while also ensuring the requirements of Whistleblower legislation are met, where applicable). This would involve taking steps to verify the allegations, while protecting the confidentiality and safety of the complainant. We understand that modern slavery investigations can be complex, and we would also seek to draw on external expertise, including from human rights experts, where appropriate.



**COMPLAINTS RECEIVED DURING FY23**

Qantas continues to promote its Whistleblower program as an avenue for reporting matters of concern regarding the Qantas Group, including for human rights-related issues. Breaches of internal policies and behavioral matters were the main nature of allegations made via our Whistleblower channels in FY23. While none of the matters raised via our Whistleblower program in FY23 were related to human rights, we did receive and respond to five reports regarding matters occurring within our supply chain. Regardless of whether an investigation is able to substantiate an allegation, improvement opportunities may be identified and implemented, such as enhancements to training or processes. We continue to seek opportunities to make our Whistleblower program an accessible and trusted channel to report matters of concern for all personnel within the Qantas Group and across our value chain.



**BUILDING TRUST IN OUR GRIEVANCE MECHANISMS**

All reports received through the Whistleblower program are treated confidentially and with regard to the protection of the complainant. Our Whistleblower program is promoted to our employees through our mandatory training courses, via periodic employee communications and through information available on our internal company intranet sites. The Whistleblower Policy is also publicly available on the Qantas website and contains information on how to make a report. We are continuing to consider how we can further enhance the effectiveness of our Whistleblower program.



**OUR SUPPLIER EXPECTATIONS**

Our Supplier Code of Conduct requires our suppliers to have their own Whistleblower policy or equivalent process, as well as a grievance management process for their employees and suppliers. We continue to consider how we can best reach workers in our supply chain to increase awareness of and improve the accessibility of our Whistleblower reporting channels, including taking steps to understand how grievance channels are operationalized by our suppliers, and the challenges in embedding mechanisms deeper in the supply chain. During FY23, we enhanced the requirements in our Supplier Code of Conduct to further clarify our expectations for suppliers to ensure there are channels for people to raise concerns and access remedy, and that where potential harm is identified it is investigated and addressed.



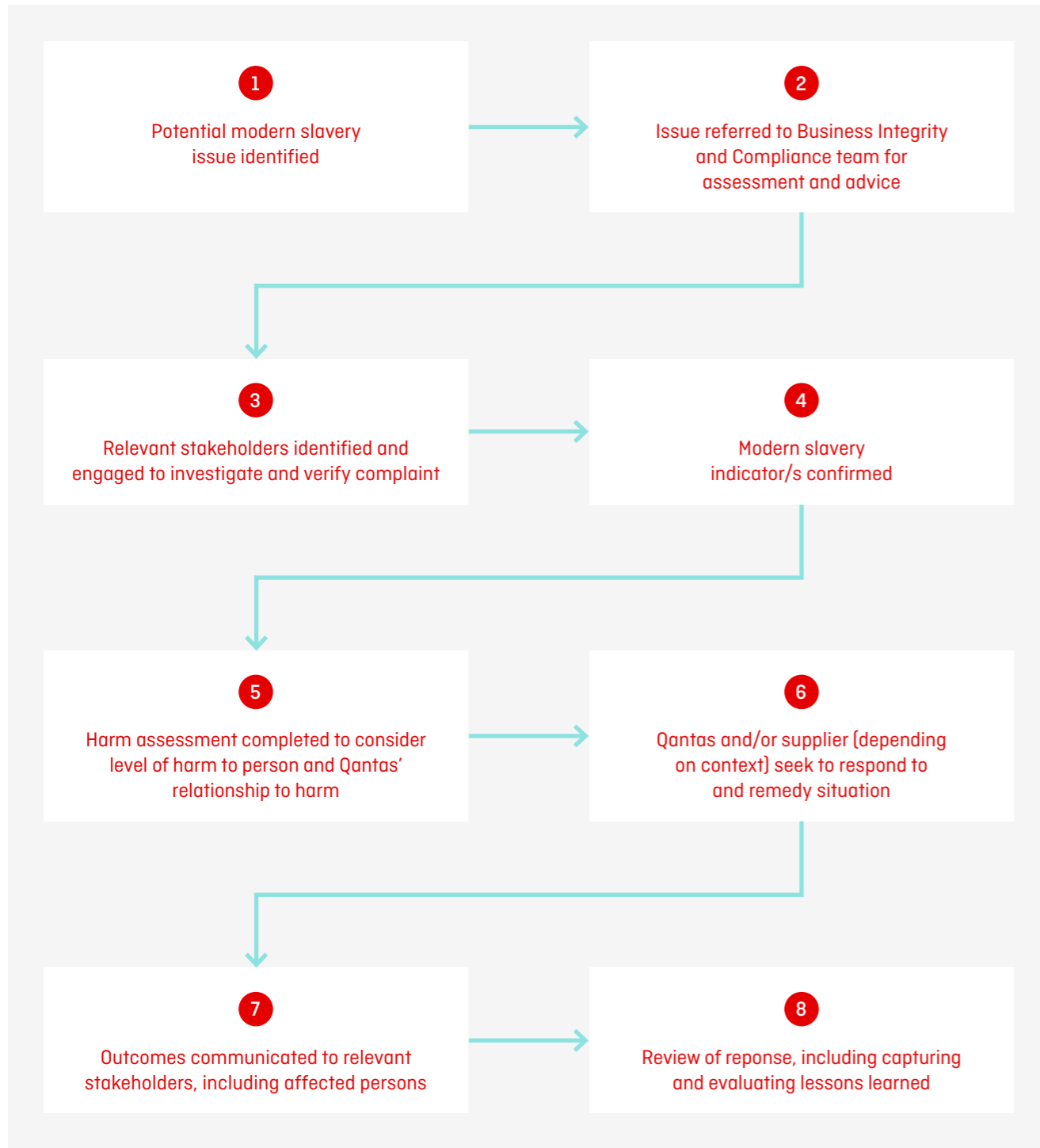
**DEVELOPING OUR MODERN SLAVERY INCIDENT RESPONSE PRINCIPLES AND GUIDELINES**

In FY23, we developed detailed Modern Slavery Incident Response Principles and Guidelines (MSIRP). This 10 page framework identifies key steps the Group may take to manage and respond to a potential case of modern slavery identified in our operations or value chains. We recognize that the actions taken to manage modern slavery, forced labour or child labour risk may impact on suppliers workers, including their families and, we are continuing to build our understanding of this area and how these considerations integrate with our broader modern

slavery response protocols and our commitments to provide for or cooperate in remediation in line with our level of involvement, in line with the UNGPs.

The development of the MSIRP was informed by the UNGPs and other relevant standards. The adjacent flowchart sets out the key steps from our MSIRP.

The MSIRP is managed and overseen by our Business Integrity and Compliance team, which is responsible for implementing our modern slavery response. As part of the implementation of the MSIRP, we are continuing to provide training to our people about how to identify and report modern slavery red flags (see page 30).



**ENGAGING WITH LAW ENFORCEMENT TO SUPPORT HUMAN TRAFFICKING INVESTIGATIONS**

Due to their global connectivity, airlines carry a risk that their services may be used by third parties to facilitate human trafficking (a form of modern slavery) and the sexual exploitation of children in travel and tourism. The Australian Government estimates that only one in five modern slavery victims exploited in Australia are identified. This means that it is important our people are equipped to safely identify and report modern slavery red flags.

If our people identify human trafficking or other modern slavery-related concerns in relation to passengers transiting through airports, we report these concerns to authorities, as appropriate.

We also work to support investigations into suspected human trafficking and child sexual exploitation. This can include providing information to investigating authorities in response to formal requests. For example, during the reporting period, we assisted both Australian and overseas law enforcement agencies with requests for information in relation to potential human trafficking matters. We also engaged with the Australian Federal Police (AFP) on its "Look-A-Little-Deeper" training and awareness program to explore how this might be relevant in the aviation industry context. In FY24 we will be exploring further opportunities for collaboration with the AFP and broader industry participants, recognising the collective role that we have to identify and solve for this issue.

**ENGAGING WITH OUR SUPPLIERS TO PROMOTE TRUSTED AND ACCESSIBLE GRIEVANCE MECHANISMS**

As part of our broader supplier governance processes, we engaged with selected suppliers during FY23 to understand their progress in addressing issues identified in areas such as excessive work hours, non-payment of mandated social insurances and health and safety non-conformances. We also used this engagement as an opportunity to raise suppliers' awareness about the importance of trusted and accessible grievance mechanisms and learn more about the challenges and opportunities faced by suppliers in this space.

Key themes raised by suppliers during these discussions included:

- Challenges practically in meeting requests from multiple customers to promote different and bespoke customer-run grievance mechanisms to workers
- Situations where workers may choose to leave their positions when issues are experienced (where they have the freedom to do so), rather than choosing to use a grievance mechanism to make a formal complaint and

discussion on the factors that may influence a decision to leave such as a workers' perception that relevant supplier or customer-run grievance mechanisms are not trusted nor accessible, or other cultural contexts;

- The sophistication of grievance mechanisms and other reporting channels varies significantly and can range from 'open-door policies', physical 'suggestion boxes' to instant messaging mobile apps such as 'WhatsApp' and 'WeChat' to dedicated, independently run SpeakUp channels.

Our engagement with these suppliers has highlighted the importance of customers working with their suppliers to identify practical steps that can be implemented to foster the development of trusted and accessible grievance mechanisms. We will continue to engage with our suppliers in this area over FY24, including by monitoring responses to our revised DDQ which has been expanded to understand what grievance channels exist and ways that workers can report issues of concern.





COLLABORATION AND STAKEHOLDER ENGAGEMENT

In recognition that no singular organisation, business or person can tackle modern slavery in isolation, collaboration is a key component of our modern slavery response. We understand that to effect positive and sustainable change requires collective cross-sectoral and multi-agency action and we seek opportunities to collaborate with a wide range of stakeholders, including suppliers, business partners, civil society and relevant government agencies, as appropriate. This enables us to share lessons and insights, identify and contribute to the development of good-practice responses, help shape effective legislative responses, and to support meaningful, sector wide progress in combating modern slavery.

During the reporting period, we continued to participate in multi-stakeholder forums and collaborate on human rights issues (including modern slavery) with the following groups.



We are a signatory to the United Nations Global Compact, the world's largest corporate sustainability initiative. We are also an active member of the UN Global Compact Network Australia (UNGCNA) and the UNGCNA's Modern Slavery Community of Practice. During the reporting period, we engaged on issues such as remediating modern slavery incidents and evolving global developments relevant to modern slavery. We also participated in a consultation session arranged by the UNGCNA to inform the statutory review of the Australian MSA as well as a session with the UN Special Rapporteur on Contemporary Forms of Slavery.



Qantas maintains dialogue with the Australian Government and its agencies on a broad range of issues. During the reporting period for example, we engaged with the Australian Centre to Counter Child Exploitation (ACCCE) to collaborate on the prevention and deterrence of child exploitation involving travel by air. We also engaged with the Australian Federal Police on its 'Look-A-Little-Deeper' program and will continue to leverage this program in our broader response including collaboration on an industry pilot program. We attended the three-day Attorney-General's Department Modern Slavery Conference, a valuable engagement opportunity bringing together, national and international governments, regulators, non-government organisations, corporates, civil society, people with lived experience, modern slavery experts, academics and practitioners. This conference highlighted the importance of collaboration and partnership to address modern slavery, and the criticality of incorporating the perspective of persons with lived experience and considering the voice and agency of workers in addressing and responding to modern slavery.



International Civil Aviation Organisation (ICAO) is a specialised agency of the United Nations that establishes internationally aligned aviation standards to realise safe, secure and sustainable air operations, including efforts to prevent human trafficking. We have historically participated in government consultation regarding proposed ICAO measures to combat human trafficking.



Qantas is an International Air Transportation Association (IATA) member. We actively contribute to the development of international standards and practices for global airlines, including in relation to human trafficking. We have leveraged the IATA guidance on human trafficking provided to airlines in the development of our human trafficking training program (see page 30). We continue to explore opportunities to engage with IATA and other airlines on human trafficking initiatives.

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## Section 5: Assessing the Effectiveness of Our Actions

### Assessing the effectiveness of our actions to manage modern slavery risk is key to our continuous improvement

For the Group, being effective in managing modern slavery including forced labour and child labour risks means that we can affect positive change through our processes and actions and be able to demonstrate and communicate how we do so. Our Business Integrity and Compliance function is primarily responsible for considering the effectiveness of our actions.

We see the core components of an effective response to modern slavery as including the following:

- Robust standards that set clear expectations for workers in our operations and supply chains, and are meaningfully communicated to workers, suppliers and other stakeholders.
- Meaningful risk assessment and broader due diligence processes that enable the accurate and timely identification and prevention or mitigation of potential modern slavery risks, including potential forced labour and child labour indicators.
- Trusted and accessible grievance mechanisms to facilitate the reporting and remediation of modern slavery-related complaints.

Credibly tracking the effectiveness of actions in a modern slavery or broader human rights context is complex. We recognise that high level key performance indicators and metrics may not always provide a meaningful representation of effectiveness. In light of these challenges, we are committed to continuing to refine our approach to assessing effectiveness, including through engagement and collaboration with key industry peers and external human rights experts. In FY24, an internal audit of our Supply Chain Assurance program is planned<sup>15</sup>, the scope of which will include the end-to-end process across Procurement and each risk area in scope of the program (including modern slavery). Additionally, a separate internal audit focussing on modern slavery assurance is under consideration, with the scope and timing yet to be finalised. This will enhance our understanding of our effectiveness by providing a mechanism for us to review our progress to date and opportunities for improvement.

#### ASSESSING EFFECTIVENESS: EXTERNAL FEEDBACK

Feedback from external stakeholders assists us to understand and monitor our effectiveness, including by enabling us to understand how we compare to key peers and where there are opportunities for improvement in our response.

During the reporting period, Monash University's Modern Slavery Research program assessed the Statements submitted by ASX100 companies in FY21. The Qantas Group's

Statement received an 'A' rating, improving on our rating from the previous year. Additionally, in June 2023, the Australian Council of Superannuation Investors (ACSI) released the outcomes of its review of the FY22 Modern Slavery Statements submitted by ASX200 companies. Qantas scored in the top quartile and we have further engaged with ACSI to understand how we can apply the report findings and continue to enhance our reporting in this area.

CORE COMPONENT OF OUR RESPONSE	INDICATIVE ASSESSMENT CRITERIA / KPIs	HOW WE ASSESS OUR EFFECTIVENESS	KEY OUTCOMES
<b>Robust standards that set clear expectations for workers in our operations and supply chains and are meaningfully communicated to workers, suppliers and other stakeholders.</b>	<ul style="list-style-type: none"> <li>— Our policy frameworks are fit for purpose and meaningfully implemented.</li> <li>— Our modern slavery risk management response aligns with good practice across sectors and responds to new and emerging issues.</li> </ul>	<ul style="list-style-type: none"> <li>— Periodically reviewing key policy frameworks to assess whether they are fit for purpose.</li> <li>— Considering feedback from suppliers, investors and other stakeholders, including credible benchmarks, to identify opportunities for improvement.</li> </ul>	<ul style="list-style-type: none"> <li>— We updated our Supplier Code of Conduct and Supplier Requirements to more clearly outline our expectations with regard to human rights issues, including modern slavery (see page 29).</li> <li>— We translated our Supplier Code of Conduct and our DDQ into another prominent foreign language, and also revised our DDQ (see page 37).</li> <li>— We reviewed the results of relevant modern slavery statement benchmarks, to understand key reporting trends and opportunities to enhance our Statement, including meeting with ACSI.</li> </ul>
<b>Meaningful risk assessment and broader due diligence processes that enable the accurate and timely identification and prevention or mitigation of potential modern slavery risks.</b>	<ul style="list-style-type: none"> <li>— Our risk assessment processes accurately identify our modern slavery risks.</li> <li>— Our due diligence processes enable us to identify and manage modern slavery risks relating to suppliers and other third parties.</li> <li>— Our training programs equip our people to understand and manage modern slavery risks, including safely reporting concerns.</li> </ul>	<ul style="list-style-type: none"> <li>— Periodically refreshing our salient human rights issues to help ensure they continue to reflect our risk profile.</li> <li>— Revising our risk triggers, as required, to respond to the evolving risk environment.</li> <li>— Monitoring the number of suppliers re-evaluated from medium to low risk following implementation of corrective actions, to identify where we have effected sustainable change.</li> <li>— Tracking completion rates for our training and monitoring feedback from participants.</li> </ul>	<ul style="list-style-type: none"> <li>— During the reporting period, we continued to work with an independent specialist business and human rights advisory firm to refresh our salient human rights issues (see page 38).</li> <li>— We undertook a deep dive review of potential adverse human rights impacts such as modern slavery involved in both the conventional and sustainable fuel value chains.</li> <li>— Revised our risk triggers, bringing additional categories of procurement into scope.</li> <li>— 11 suppliers in the reporting period were re-evaluated from medium to low risk for human rights.</li> <li>— A post training survey of a face-to-face training session identified that 62% of respondents learned something new about modern slavery and that the material was both very relevant and valuable to their role.</li> </ul>
<b>Trusted and accessible grievance mechanisms to facilitate the reporting and remediation of modern slavery-related complaints.</b>	<ul style="list-style-type: none"> <li>— Relevant stakeholders trust and are able to access our grievance mechanisms.</li> <li>— Any modern slavery related complaints received are appropriately identified and investigated.</li> <li>— Where we identify we have caused or contributed to human rights harm, we provide for or cooperate in remediation.</li> </ul>	<ul style="list-style-type: none"> <li>— Monitoring the number of modern slavery and broader human rights complaints received, to help us understand whether our grievance mechanisms are trusted and accessible.</li> <li>— Reviewing the operation of our grievance mechanisms, including through internal audits.</li> </ul>	<ul style="list-style-type: none"> <li>— We developed a detailed Modern Slavery Incident Response Principles and Guidelines document to guide our response to potential modern slavery allegations relating to our operations and supply chain (see page 41).</li> <li>— We engaged with selected suppliers to raise awareness about the importance of trusted and accessible grievance mechanisms and opportunities and challenges faced by suppliers in this area</li> </ul>

15 At the time of writing, this audit was in progress, however as it this activity is outside the reporting period, it will not be covered in this Statement.





## Section 6: Consultation with Reporting Entities and Owned or Controlled Entities

This Statement was developed through a Group-wide consultation process. This included consultation with the reporting entity covered by the Statement, Qantas, as well as owned and controlled entities across the Group.

In addition to the consultation process to develop the Statement, all entities across the Group, while not reporting entities under the Supply Chains Act, work closely on an ongoing basis to implement and monitor our modern slavery risk management approach, including through our supply chain assurance activity.

### OUR WHOLE-OF-GROUP CONSULTATION PROCESS

The Business Integrity and Compliance function led a whole-of-Group consultation process to develop this Statement. This consultation process involved the key teams that work together to mitigate and manage potential modern slavery risk in our operations and supply chains, including our Procurement, Legal, People, Industrial Relations, Loyalty, Risk and Corporate Governance functions. These functions provided input to the development of this Statement, and a draft was made available for their review prior to publication.

This cross-functional consultation helped to ensure the Statement reflects our Group-wide approach to modern slavery and facilitates ongoing engagement from key internal stakeholders on our response to modern slavery.



## Appendix 1: List of Reporting Entities and Owned or Controlled Entities<sup>3</sup>

<b>AAL Aviation Limited<sup>1</sup></b> (83 008 642 886) The principal activities during the period were that of a non-operative holding company.	<b>Phone a Flight Pty Ltd<sup>2</sup></b> (41 608 735 664) The principal activities during the period were that of a dormant non-operative company.	<b>QF BOC 2008-2 Pty Limited<sup>2</sup></b> (35 100 510 727) The principal activities during the period were that of an aircraft leasing company.
<b>Airlink Pty Limited<sup>1</sup></b> (76 010 812 316) The principal activities during the period were to provide passenger air transportation services.	<b>Q H Tours Ltd<sup>1</sup></b> (81 001 262 433) The principal activities during the period were that of an investment holding company.	<b>QF Dash 8 Leasing No. 4 Pty Limited<sup>2</sup></b> (91 135 258 445) The principal activities during the period were that of an aircraft leasing company.
<b>Australian Air Express Pty Ltd<sup>1</sup></b> (74 054 307 336) The principal activities during the period were the provision of freight ground operation services.	<b>Qantas Airways Domestic Pty Limited<sup>2</sup></b> (52 123 140 152) The principal activities during the period were that of an Air Operator Certificate holding company.	<b>QF Dash 8 Leasing No. 5 Pty Limited<sup>2</sup></b> (31 149 204 713) The principal activities during the period were that of an aircraft leasing company.
<b>Australian Airlines Limited<sup>1</sup></b> (85 099 625 304) The principal activities during the period were that of a dormant non-operative company.	<b>Qantas Asia Investment Company Pty Ltd<sup>1</sup></b> (26 125 048 044) The principal activities during the period were that of an investment holding company.	<b>QF Dash 8 Leasing No. 6 Pty Limited<sup>2</sup></b> (35 164 390 238) The principal activities during the period were that of an aircraft leasing company.
<b>Australian Regional Airlines Pty. Ltd.<sup>1</sup></b> (25 006 783 633) The principal activities during the period were that of a non-operative holding company.	<b>Qantas Courier Limited<sup>1</sup></b> (32 003 890 328) The principal activities during the period were to provide domestic freight services within New Zealand.	<b>QF ECA 2008-1 Pty Limited<sup>2</sup></b> (71 133 356 475) The principal activities during the period were that of an aircraft leasing company.
<b>Eastern Australia Airlines Pty. Limited<sup>1</sup></b> (77 001 599 024) The principal activities during the period were to provide passenger air transportation services.	<b>Qantas Domestic Pty Limited<sup>1</sup></b> (21 134 556 255) The principal activities during the period were to provide cabin crew services.	<b>QF ECA 2008-2 Pty Limited<sup>2</sup></b> (73 133 356 420) The principal activities during the period were that of an aircraft leasing company.
<b>Express Freighters Australia (Operations) Pty Limited<sup>1</sup></b> (54 119 093 999) The principal activities during the period were the employment, training and provision of personnel.	<b>Qantas Freight Enterprises Limited<sup>1</sup></b> (55 128 862 108) The principal activities during the period were that of a non-operative holding company.	<b>QF ECA A380 2010 No.1 Pty Limited<sup>2</sup></b> (14 145 079 312) The principal activities during the period were that of an aircraft leasing company.
<b>Express Freighters Australia Pty Limited<sup>1</sup></b> (73 003 613 465) The principal activities during the period were to provide freight air transportation services.	<b>Qantas Frequent Flyer Limited<sup>1</sup></b> (12 129 456 908) The principal activities during the period were that of a non-operative holding company.	<b>QF ECA A380 2010 No.2 Pty Limited<sup>2</sup></b> (78 145 079 205) The principal activities during the period were that of an aircraft leasing company.
<b>Impulse Airlines Holdings Proprietary Limited<sup>1</sup></b> (67 090 590 024) The principal activities during the period were that of a non-operative holding company.	<b>Qantas Frequent Flyer Operations Pty Limited<sup>1</sup></b> (22 132 484 210) The principal activities during the period were that of a non-operative holding company.	<b>QF ECA A380 2010 No.3 Pty Limited<sup>2</sup></b> (61 145 079 134) The principal activities during the period were that of an aircraft leasing company.
<b>Jetstar Airways Pty Limited<sup>1</sup></b> (33 069 720 243) The principal activities during the period were to provide passenger air transportation services.	<b>Qantas Ground Services Pty Limited<sup>1</sup></b> (43 137 771 692) The principal activities during the period were to provide airline ground services.	<b>QF ECA A380 2010 No.4 Pty Limited<sup>2</sup></b> (42 145 079 054) The principal activities during the period were that of an aircraft leasing company.
<b>Jetstar Asia Holdings Pty Limited<sup>1</sup></b> (86 108 623 123) The principal activities during the period were that of an investment holding company.	<b>Qantas Group Accommodation Pty Ltd<sup>1</sup></b> (32 152 774 457) The principal activities during the period were that of an Online Travel Agent for hotels and selling flight and accommodation packages.	<b>QF ECA A380 2011 No.1 Pty Limited<sup>2</sup></b> (11 145 078 931) The principal activities during the period were that of an aircraft leasing company.
<b>Jetstar Group Pty Limited<sup>1</sup></b> (64 003 901 353) The principal activities during the period were to provide cabin crew services.	<b>Qantas Group Flight Training (Australia) Pty Limited<sup>1</sup></b> (45 128 258 677) The principal activities during the period were to provide flight training services.	<b>QF ECA A380 2011 No.2 Pty Limited<sup>2</sup></b> (19 146 437 774) The principal activities during the period were that of an aircraft leasing company.
<b>Jetstar International Group Australia Pty Limited<sup>2</sup></b> (17 152 774 395) The principal activities during the period were that of an investment holding company.	<b>Qantas Group Flight Training Pty Limited<sup>1</sup></b> (29 128 258 104) The principal activities during the period were to provide flight training services.	<b>QF EXIM B787 No.1 Pty Limited<sup>2</sup></b> (53 166 786 321) The principal activities during the period were that of an aircraft leasing company.
<b>Jetstar Services Pty Limited<sup>1</sup></b> (19 107 638 326) The principal activities during the period were to provide airline ground services.	<b>Qantas Information Technology Ltd<sup>1</sup></b> (99 000 005 372) The principal activities during the period were to provide information technology services.	<b>QF EXIM B787 No.2 Pty Limited<sup>2</sup></b> (49 166 786 367) The principal activities during the period were that of an aircraft leasing company.
<b>National Jet Operations Services Pty Ltd<sup>1</sup></b> (33 055 887 575) The principal activities during the period were to provide cabin crew services.	<b>Qantas Road Express Pty Limited<sup>1</sup></b> (56 130 392 111) The principal activities during the period were to provide road transportation services carrying international air cargo.	<b>Regional Airlines Charter Pty Limited<sup>1</sup></b> (21 147 543 806) The principal activities during the period were to provide passenger air transportation services.
<b>National Jet Systems Pty Ltd<sup>1</sup></b> (11 008 279 203) The principal activities during the period were to provide passenger air transportation services.	<b>Qantas Ventures Pty Limited<sup>1</sup></b> (55 622 616 611) The principal activities during the period were that of an investment holding company.	<b>Sunstate Airlines (Qld) Pty. Limited<sup>1</sup></b> (82 009 734 703) The principal activities during the period were to provide passenger air transportation services.
<b>Network Aviation Holdings Pty Ltd<sup>1</sup></b> (081 505 008) The principal activities during the period were that of a non-operative holding company.	<b>Qantas Wheatbelt Connect Pty Limited<sup>1</sup></b> (86 666 462 504) The principal activities during the period were that of an investment vehicle.	<b>TAD Holdco Pty Ltd<sup>1</sup></b> (90 637 674 376) The principal activities during the period were that of a non-operative holding company (the Group's interest in this entity was acquired on 31 May 2022).
<b>Network Aviation Pty Ltd<sup>1</sup></b> (082 007 350) The principal activities during the period were to provide passenger air transportation services.	<b>QF Cabin Crew Australia Pty Limited<sup>1</sup></b> (46 128 382 105) The principal activities during the period were to provide cabin crew services.	<b>Taylor Fry Holdings Pty Limited<sup>2</sup></b> (63 604 441 483) The principal activities during the period were that of an investment holding company.
<b>Network Holding Investments Pty Ltd<sup>1</sup></b> (110 179 818) The principal activities during the period were that of a non-operative holding company.	<b>QF A332 Leasing 1 Pty Limited<sup>2</sup></b> (11 100 511 813) The principal activities during the period were that of an aircraft leasing company.	<b>Taylor Fry Pty Limited<sup>2</sup></b> (29 087 047 809) The principal activities during the period were the provision of actuarial, financial modelling, statistical and analytics services to businesses and governments.
<b>Network Turbine Solutions Pty Ltd<sup>1</sup></b> (20 110 180 008) The principal activities during the period were maintenance of Fokker F100 and Airbus A320 aircraft.	<b>QF A332 Leasing 2 Pty Limited<sup>2</sup></b> (13 100 511 886) The principal activities during the period were that of an aircraft leasing company.	<b>TripDeal Holdings Pty Ltd<sup>2</sup></b> (97 617 898 263) The principal activities during the period were that of a non-operative holding company (the Group's interest in this entity was acquired on 31 May 2022).
<b>Osnet Jets Pty Ltd<sup>1</sup></b> (99 128 559 419) The principal activities during the period were that of a dormant non-operative company.	<b>QF BOC 2008-1 Pty Limited<sup>2</sup></b> (22 100 510 674) The principal activities during the period were that of an aircraft leasing company.	<b>TripADeal Pty Ltd<sup>2</sup></b> (50 149 240 433) The principal activities during the period were providing online travel agent services, specialising in tour-based packages (the Group's interest in this entity was acquired on 31 May 2022).
		<b>VII Pty Limited<sup>1</sup></b> (83 619 963 263) The principal activities during the period were that of an IT Service Provider for gift cards.

<sup>1</sup> These entities are reporting entities for the purposes of the Australian Modern Slavery Act.

<sup>2</sup> These entities are not reporting entities for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

<sup>3</sup> None of these entities are reporting entities for the purposes of the Supply Chains Act. They have been included in this list in the interest of transparency.

