

Modern Slavery and Human Trafficking Statement 2024



About this Statement

This Modern Slavery Statement (**Statement**), is made under the *Australian Modern Slavery Act 2018* (Cth) (**MSA**), s54(1) of the United Kingdom (UK) *Modern Slavery Act 2015* (**UK MSA**) and the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (**Supply Chains Act**). It sets out the actions taken by the Qantas Group to assess and address modern slavery risks¹ in our operations and supply chains during the year ended 30 June 2024 (**FY24 or the reporting period**).

Qantas Airways Limited (**Qantas**) is an Australian public company (ABN 16009661901), registered at 10 Bourke Rd, Mascot, NSW, Australia. This Statement is a joint Statement on behalf of Qantas and its controlled entities (**Qantas Group**) deemed to be reporting entities under the MSA. This includes reporting entities which are wholly owned subsidiaries, as well as other entities over which Qantas has control under the Australian Accounting Standards.

A list of the reporting entities under the MSA and covered by this Statement, and other controlled entities that do not meet the threshold for reporting entities under the MSA but have been included for transparency, is provided in Appendix 5.

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 reporting 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 2024.

Prior to Board approval, this Statement was reviewed by the Group General Counsel, the Chief Corporate Affairs and Communications Officer, and the Acting Chief Sustainability Officer. An independent specialist business and human rights advisory firm also supported the drafting and review process. It was subsequently endorsed by the Qantas Group Managing Director and Chief Executive Officer (**CEO**) and Group Leadership Team (**GLT**). Additional information about consultation with reporting entities and other owned and controlled entities is set out in section 6.

This Statement was approved by the Qantas Board on behalf of all reporting entities (acting as a higher entity under section 14(2)(d) (ii) of the MSA) on 13 December 2024 and is signed by the CEO and a Director of the Qantas Board, as required by the Australian MSA, UK MSA, and Canadian Supply Chains Act.

¹ In this Statement, a reference to ‘modern slavery’ refers to 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. It also refers to the terms ‘forced labour’ and ‘child labour’ as defined in section 2 of the Canadian Supply Chains Act.



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

Photo: QantasLink A220 Minyma Kutjara Tjukurpa flying over Uluru-Kata Tjuta National Park, the lands of the Anangu Traditional Owners.
Photo credit: James D. Morgan via Getty Images

CEO Message



As an international airline group, we see firsthand the benefits of a globally connected world.

Each year, our services help millions of Australians to connect with each other and the world around us, whether to catch up with family and friends, for work, or for leisure. We also recognise that operating in a global economy also carries challenges, including that we may be exposed to modern slavery risks through our operations and supply chains.

As a business, we continue to invest time and effort into strengthening our modern slavery risk management approach as part of our broader work to respect human rights. We also aim to be transparent in how we communicate our work, including sharing our reflections on lessons learned.

This is the Qantas Group’s fifth Statement under the MSA, our ninth in line with the requirements of the UK MSA and our second under the Canadian Supply Chains Act. It sets out our approach and actions to manage modern slavery risks in our operations and supply chains throughout FY24, including our key achievements.

I am particularly proud of our work to engage constructively with our suppliers to help us better understand their risks and build their capacity. We continue to invest in building strong relationships, including through site visits which allow us, among other things, to assess their modern slavery risk management. We are also partnering with our airline peers to take action through the newly established Modern Slavery Aviation Forum.

While we have not identified verified instances of modern slavery during this reporting period, we are continuing to work with a tier two supplier in Thailand to investigate the potential charging of recruitment fees to migrant workers.

We also worked to address two instances involving alleged poor workplace practices (although not meeting the threshold for modern slavery) of two Australian suppliers.

Looking forward, we plan to further strengthen our approach, including by exploring ways to ensure that our grievance mechanisms are trusted by, and accessible to, workers in our operations and supply chains, as well as other stakeholders who may wish to raise modern slavery or broader human rights concerns. We are also reviewing how we can ensure stronger governance of our modern slavery response and, in August 2024, provided a strategic briefing on modern slavery and broader human rights to the Qantas Board.

In accordance with the requirements of the Supply Chains Act, and in particular 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 FY24.

I am pleased to sign and present this Statement, which was approved by the Qantas Board on 13 December 2024.

Vanessa Hudson

Vanessa Hudson
CEO and Managing Director
Qantas Group, 13 December 2024

I have the authority to bind Qantas Airways Limited

Key Areas of Action

During FY24, we progressed key actions to enhance our modern slavery response.



Expanded our Third-Party Due Diligence Approach

We developed and implemented a Due Diligence Questionnaire (DDQ) tailored to our business partnerships, and also implemented a revised DDQ expanding on questions asked in relation to areas such as child labour and age verification processes, use of recruitment agencies, as well as grievance mechanisms.

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Jointly Established the Modern Slavery Aviation Forum

Established a new forum to collaborate with other airlines in Australia and New Zealand to combat modern slavery.

See page 21



Developed a Modern Slavery Indicator Assessment Tool for Supplier Visits

We developed and implemented a new assessment tool to help us better engage with suppliers about modern slavery during site visits.

See page 17



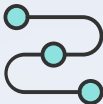
Reviewed the Effectiveness of our Grievance Mechanisms

We partnered with an expert third party business and human rights advisory firm to review the effectiveness of our grievance mechanisms from a human rights perspective.

See page 19

Key Areas of Action in Previous Reporting Periods to Enhance our Modern Slavery Response

FY21²



Reviewed our human rights risk triggers, weighting and assessments to ensure they were reflective of increased vulnerabilities in global supply chains.



Undertook assessment of Personal Protective Equipment (PPE) suppliers as part of our response to the pandemic.



Continued to embed bilateral modern slavery clauses into our precedent contracts for suppliers.



Updated our Code of Conduct and Human Rights Policy Statement.

FY22



Commenced the refresh of our salient human rights issues.



Implemented human trafficking awareness training for our crew.



Launched a project to assess our unassessed supplier base.



Strengthened our governance processes.

FY23



Undertook a deep dive into potential adverse human rights impacts in our fuel supply value chains.



Conducted site visits to selected suppliers in Thailand and Europe.



Developed our modern slavery response plan.



Enhanced our third-party due diligence approach.

2 During 2021 and across 2022, our response was impacted by the pandemic as outlined in our Statement for those reporting periods.

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Section 1: Introduction

Founded in 1920, Qantas is the oldest continuously-operating airline in the world. For more than 100 years we have connected Australians, and the world to destinations near and far. We understand the importance of continuous improvement and taking meaningful action to manage potential modern slavery risks across our operations and supply chains. This includes taking steps to track the implementation of the commitments we made in our FY23 Statement.

Initiatives	We said we would	Our progress in FY24
Risk Assessment and Due Diligence	 Continue to develop the actions that underpin the management of our salient human rights issues, including in relation to modern slavery.	We mapped the current actions across the Group that are relevant to managing each of our identified salient human rights issues. Based on this work, we have assessed that we have appropriate controls in place across each of the salient human rights issues.
	 Collaborate with our Customer Product 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.	We worked with our Customer Product team to prioritise supplier site visits and developed and implemented a modern slavery indicator assessment tool to enhance our capacity to identify and assess potential modern slavery risks during site visits and facilitate constructive follow up engagement with suppliers.
	 Develop an approach to incorporate human rights considerations into due diligence of strategic commercial partnerships and potential investment opportunities, linked with our Sustainability framework.	We developed human rights criteria for inclusion in a range of strategic and commercial due diligence activities, which we will continue to use to inform decisions on potential investment opportunities and acquisitions. In recognition of the need to tailor our due diligence approach to the nature of our business relationships, we also developed and implemented a Business Partnership DDQ, tailored to strategic and/or commercial partnerships, as opposed to supplier relationships.
	 Continue to expand our supplier engagement, including through visits to supplier sites and other awareness-raising activities.	We maintained an active program of visits to supplier sites, including visits to 11 sites in China, two sites in India and one in Thailand. During one site visit, we were able to provide modern slavery training to members of the supplier's senior leadership team, and the following day to some of their employees.
	 Implement 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.	We worked with our third-party risk system provider to implement our revised DDQ and update the risk model. The revised DDQ expands on questions asked in relation to certain practices which we recognise may pose modern slavery risks, for example child labour and age verification processes, use of recruitment agencies, subcontracting, as well as grievance mechanisms. Our risk modelling enables an evaluation of the controls our suppliers have in place to manage potential risks.
Training and Awareness	 Extend the scope of the Supply Chain Assurance (SCA) program to include remaining unassessed supplier base (rather than only new and renewing suppliers).	During FY23 and FY24, we ran a specialised program of work to identify, prioritise and assess suppliers who were onboarded prior to the SCA program launch in 2018. The program concluded in April 2024 and as a result, the majority of our active suppliers have now been assessed.
	 Launch our online modern slavery awareness training module for employees.	We launched the Acting with Integrity online training, which includes a modern slavery awareness module, during the first half of FY24. This training will become required learning for all employees over FY25.
	 Explore how we can better provide trusted and accessible grievance mechanisms, including by modifying our Whistleblower program to better address modern slavery grievances.	We partnered with a third-party business and human rights advisory firm to review the effectiveness of our grievance mechanisms from a human rights perspective.
Grievance Mechanisms and Remediation	 Develop a supplier engagement strategy to raise awareness and improve accessibility of our Whistleblower reporting channels for our suppliers and their workers.	We continued to engage with selected suppliers during FY24 to understand their approach to grievance mechanisms and raise awareness of the importance of these mechanisms being trusted and accessible. We also included questions relating to grievance mechanisms in our new assessment tool for supplier visits. More broadly, we also considered how suppliers interact with our grievance mechanisms as part of the effectiveness review of our grievance mechanisms undertaken during the reporting period.
Collaboration and Stakeholder Engagement	 Explore scope for engagement with airline peers in our region and globally.	We jointly established the Modern Slavery Aviation Forum (MSAF) in 2024 with Virgin Australia and Air New Zealand. The forum aims to facilitate collaboration with peers to address modern slavery and met twice during the reporting period.

 Complete  Partially Complete — Continue in FY25

Looking Ahead to FY25 and Beyond

Initiatives that we aim to deliver across FY25, to further build on our response, include:

- A strategic briefing to our Board on modern slavery and broader human rights risk management;
- Further enhancing our governance structure by identifying an appropriate forum to provide governance and oversight of our modern slavery response outside of the SCA process;
- Progressing work to implement key recommendations from the review of the effectiveness of our grievance mechanisms;
- Continuing to engage with our suppliers to assess their modern slavery risks and build their capacity to manage these risks, including by further embedding use of our modern slavery indicator assessment tool during site visits; and
- Implementing a framework to formalise our due diligence approach for our key commercial (non-supplier) relationships.

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 which operates regional, domestic and international services.

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 in the adjacent table.

Our Structure

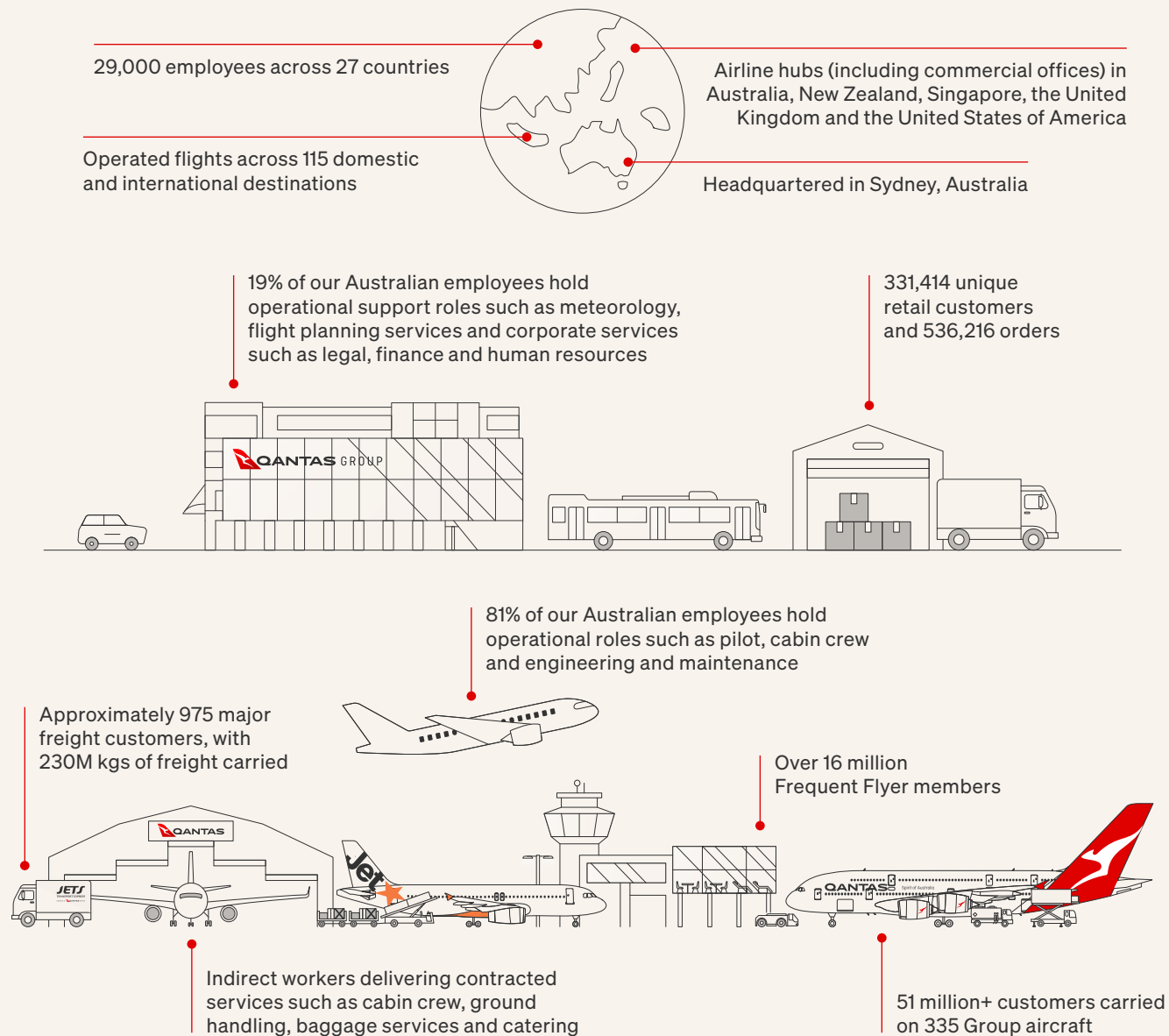
The table below provides more information about our key operations and businesses.

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 335 aircraft.	     
Loyalty	Our Loyalty program undertakes activities connected to earning or redeeming Qantas Points, including Qantas Wine, Qantas Marketplace (previously known as the Rewards Store), Qantas Hotels and Holidays, Qantas Insurance and Money, Qantas Business Rewards and retail partnerships (e.g. Woolworths, BP, ANZ, Westpac). Vii is a wholly-owned subsidiary that acts as a technology services provider specialising in gift cards and loyalty solutions. While Vii’s customer base is predominately Australian, it also includes some international transactions in the UK, US, New Zealand and Japan. TripADeal³ is a wholly-owned subsidiary. It is an online travel business offering package holidays and reports separately under the MSA. Qantas also has a majority shareholding in Taylor Fry, an actuarial and financial services provider that operates in Australia and New Zealand. The Group does not have operational or day-to-day control of Taylor Fry. More information about Qantas Loyalty is included on page 8.	         
Freight	Qantas Freight is Australia's largest air freight services business, using up to 20 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 over 20 cargo handling terminals across Australia and an extensive network of trusted business partners, including road transport operators, Qantas Freight offers an integrated end-to-end air freight solution. In FY24, Qantas Freight served over 975 customers, and carried 230 million kilograms of freight.	    
Support Services	Supporting our flying operations are a number of operational business areas, including Engineering and Maintenance; Flight Training; Safety, Health and Security; and Customer Services, as well as Group corporate support functions such as Sustainability; Treasury; Legal; Strategy; Government, Industry and International Affairs; Finance; Procurement; Human Resources; Risk; Compliance; and Technology. While most of these functions are conducted in Australia, we have corporate support teams located in New Zealand, Singapore, Japan, Hong Kong SAR, China, the US and the UK.	  

3 On 28 June 2024 Qantas purchased the remaining 49 per cent of TripADeal. It is now wholly owned by the Qantas Group. TripADeal will separately publish its Statement for FY24 in December 2024.

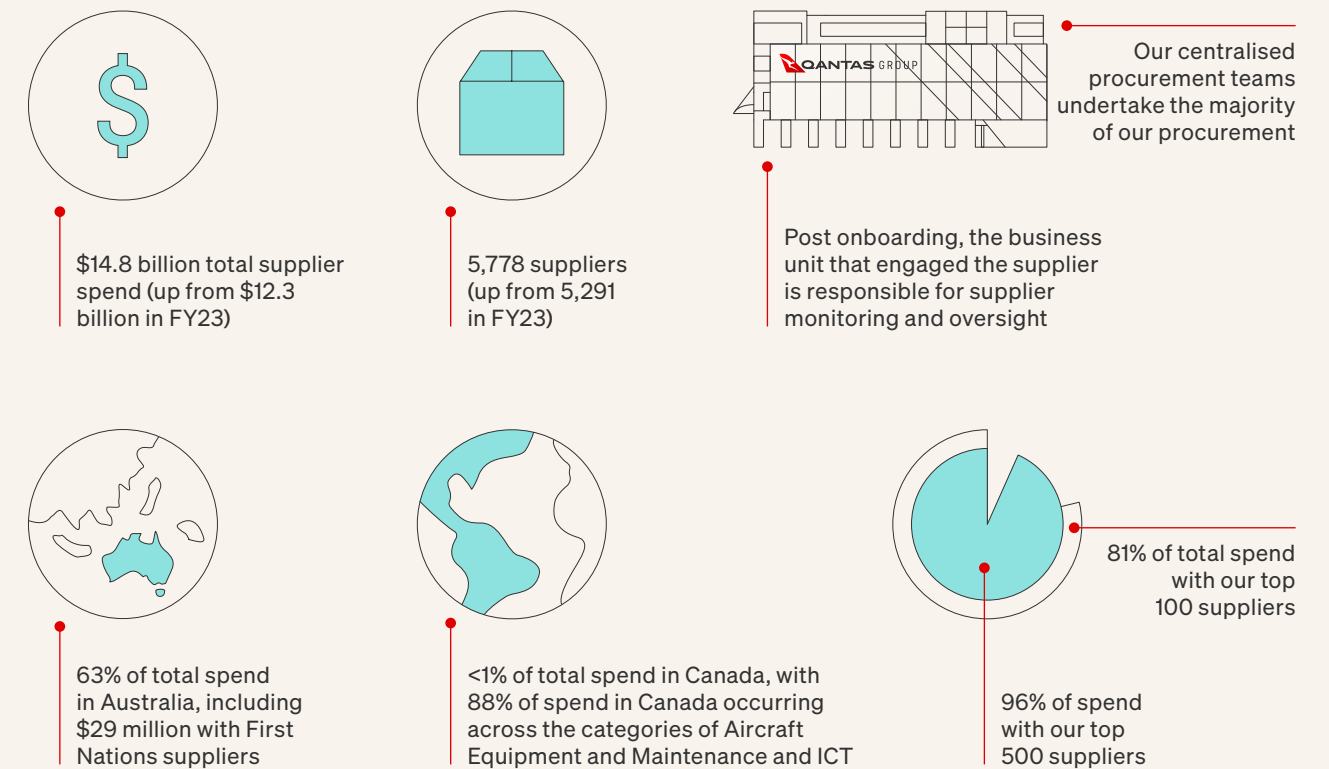
Understanding our Operations



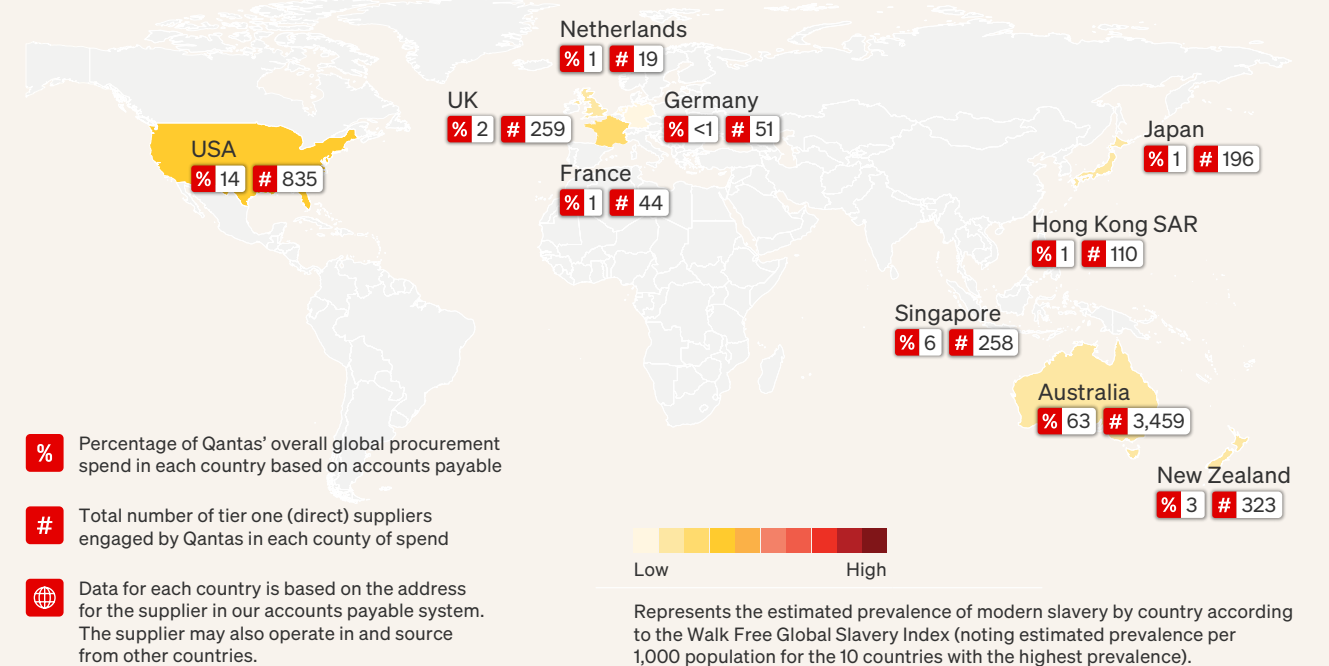
IN FY24



Understanding our Global Supply Chain



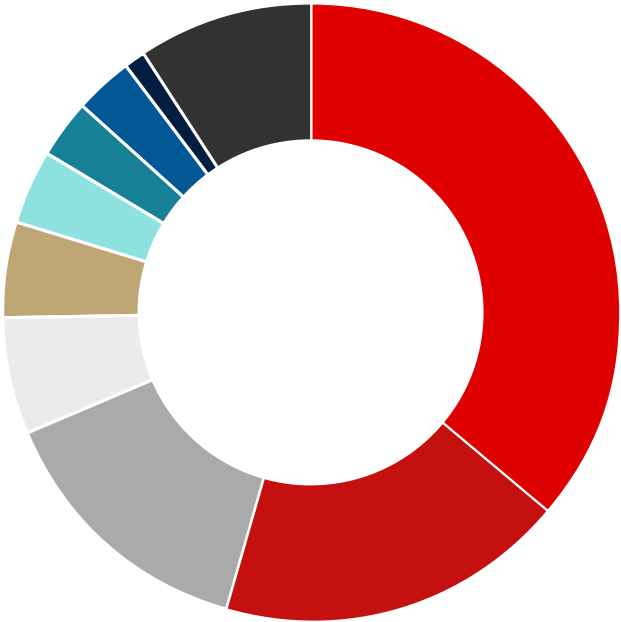
Our Geographic Spend: Top 10 Countries



What We Source

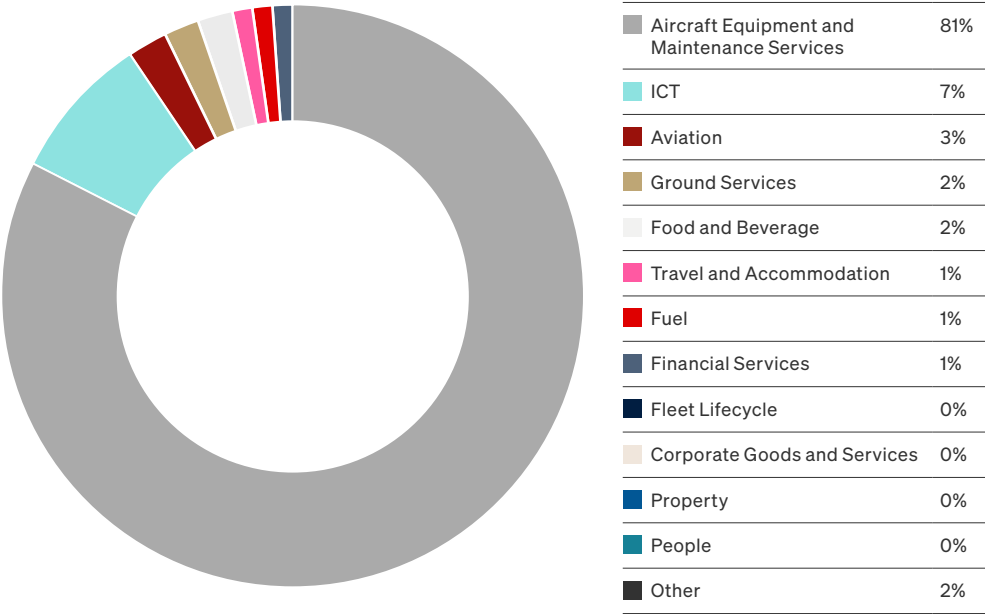
This pie chart explains our procurement sourcing footprint over FY24, including identifying the key categories of our spend and the table below outlines the types of goods and services that all under each category⁴.

Category	Share of spend	Summary of category
Fuel	36%	The Fuel category covers all air and ground-based fuel used to service transportation needs, domestically and internationally.
Aviation	18%	The Aviation category includes aviation charges incurred by airlines for their operations, including overflight and route navigation charges.
Aircraft Equipment and Maintenance Services	14%	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).
Food and Beverage	6%	The Food and Beverage category refers to any food or drinks purchased for consumption by our customers onboard aircraft and in our lounges.
Ground Services	5%	Ground Services encapsulates the parts, services and equipment used to service aircraft while parked at an airport terminal, and also includes flight simulator services, security, company vehicles and hired vehicles.
Information and Communication Technology (ICT)	4%	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.
People	3%	The People category incorporates all professional services that support the growth and development of our employees, combined with consulting, contract and recruitment services.
Property	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.
Corporate Goods and Services	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.
Inflight Goods and Services	<1%	Inflight Goods and Services involve the purchases of items to support passengers 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.
Other	9%	This category covers the different types of financial transactions made by the Group in categories such as: - Other Loyalty: 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 - Marketing and Promotions: 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 - Fleet Procurement: Fleet Procurement relates to the purchasing and hire of aircraft fleet to fly customers to their destinations - Banking and corporate finance, carbon offset transactions and miscellaneous spend.



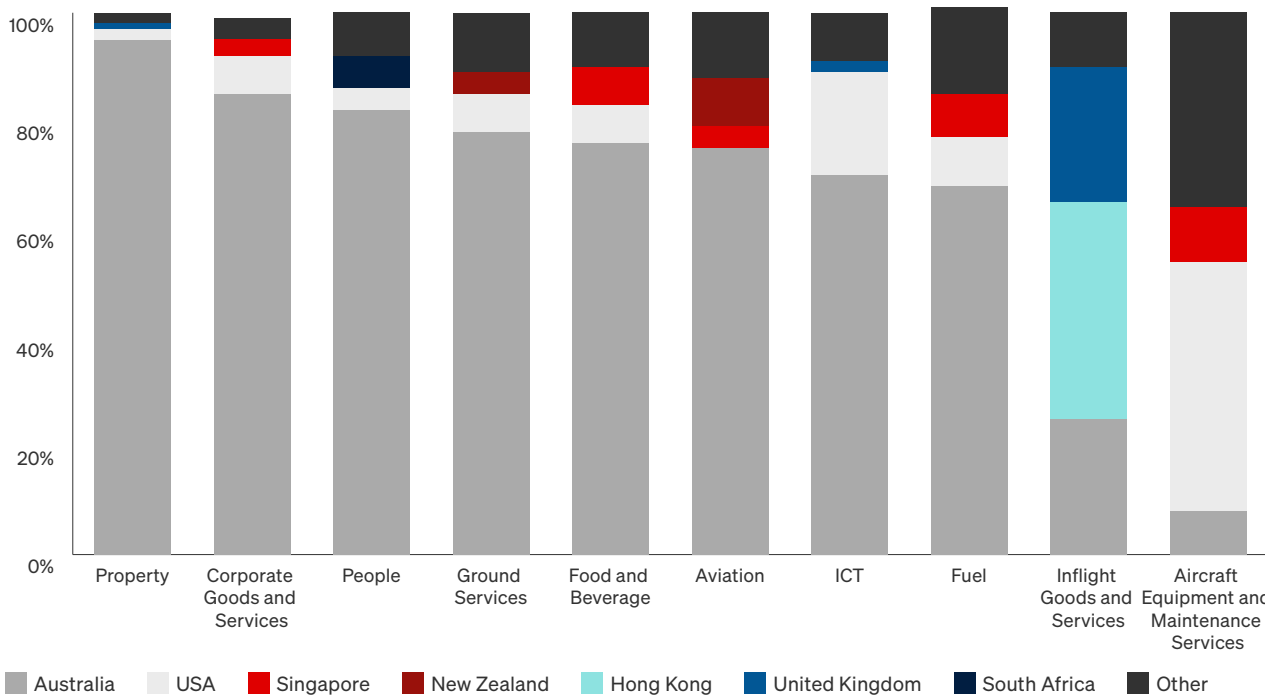
Our Sourcing Footprint In Canada

Analysis of our accounts payable system data has identified that during FY24, the Group transacted with 78 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\$118.5 million with 88 per cent 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.



Our Top Sourcing Countries⁵ 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.



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

5 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 470 suppliers of food and alcohol products, who are predominantly based in Australia. The origin of the products purchased by Qantas Wine originating from outside of Australia include; New Zealand, France, Italy, Spain, Japan, China, England, Ireland, Scotland, Greece, Belgium, Hungary, Austria, Netherlands, Poland, Portugal, Germany, Sweden, Denmark, Finland, Iceland, Belize, USA, Jamaica, Barbados, Cuba, Mexico, Canada, Chile and Argentina.

Qantas Marketplace has approximately 260 suppliers, also predominantly in Australia, with 26 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), or Australian branches of global companies (e.g. National Australia Bank, Bendigo and Adelaide Bank Limited).

Qantas Loyalty also contracts with 108 IT service providers, the majority of these are located in the USA (51), Australia (34) and three in each of India and Canada. The remainder are predominantly located across Europe. Our contact centre services are provided through a third-party service provider (TTEC). TTEC is an Australian legal entity; however, its contact centres are predominantly based in the Philippines (Manila and Duma), with an additional small onshore call centre in Australia (Gosford, NSW).

Developing a Due Diligence Approach for Partnerships

Across FY24, our Business Integrity and Compliance (BIC) team worked with our Loyalty and Group Procurement teams to determine an appropriate due diligence approach, including for modern slavery, for partnership relationships. An activity was undertaken which resulted in the identification of four thematic partnership arrangements such as Airlines, Qantas Frequent Flyer and Business Rewards, white-label and retail. These were then sub-categorised across 13 areas for example, airline loyalty programs, retail coalition, financial services, hotels and holidays and wine and marketplace, and a profiling exercise undertaken to evaluate the types of contracts, contractual and payment arrangements and the connection to the Group through the partnership. This analysis enabled us to identify which third-party relationships would be in scope for assessment via our standard SCA program, and which would require a tailored due diligence in line with our broader risk-based approach. As part of this activity, we also evaluated the contractual protections in place for each type of agreement and reviewed the Loyalty Partner Selection and Monitoring (PSM) Guidelines to ensure they remain fit for purpose.

While we are already undertaking due diligence of some partnership relationships, in FY25 we will continue to formalise the framework underpinning the process, including the criteria for targeted engagement with partners; and strengthen the PSM Guidelines to better outline how and when Loyalty will engage with BIC. More information on the work we have done with our broader third-party relationships is outlined on page 18.

Section 3: Our Modern Slavery Risks

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.

We have not identified any significant changes to our risk profile over FY24. As outlined in this Statement, we also assess we continue to have a strong suite of controls in place to manage our modern slavery risks.

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) (see adjacent box), 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 7, 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 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 airline 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 child 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.

Qantas Loyalty Retail Customers — Unique customers for the year



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 9, 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 Chains

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.

However, we understand that in some circumstances our business activities may involve modern slavery risks. This includes a 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.

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.

As an airline, we also recognise 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 work collaboratively with relevant authorities and agencies to combat this issue.

Categories of products and services and the risks of modern slavery

We consider that our greatest exposure to modern slavery risks is likely to be through our supply chain. This table outlines the key procurement categories that we have assessed may be associated with a potentially higher risk of modern slavery. 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 ⁶ in FY24 may include	Modern Slavery Risk Factors	Common Forms of Modern Slavery (hypothetical examples)
 Fuel	Conventional and Sustainable Aviation Fuel	36%	Australia, USA, Singapore	Conventional: Singapore, Thailand, South Korea SAF: Finland, China	    	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.
 Food and Beverage	Catering — inflight and lounges.	6%	Australia, Singapore, USA	Australia, NZ	   	Fruit and vegetables used in catering meals could be harvested by migrant workers in Australia exploited through debt bondage.
 ICT	IT and Communications hardware and support desk services.	4%	Australia, USA, UK	China, India, USA	   	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	   	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.
 Corporate Goods and 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	India, Sri Lanka, Indonesia	   	Apparel sourced from overseas could be manufactured by factory workers exploited through forced labour.
 Inflight Goods and Services	Customer products: amenity kits, sleeper suits, blankets, pillows, headsets.	<1%	China, Hong Kong (SAR), Australia, UK	China, Thailand, India	   	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.

 High risk geographies	 Use of migrant workers	 Use of seasonal labour	 High risk raw materials	 Use of low skilled labour
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⁶ 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.

Understanding our Geographic Exposure to Modern Slavery Risks at Tier Two and Below

As outlined on page 6, 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 16, 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 source⁷ countries and produce the adjacent map. In FY24, there has been no change in the share by country for our suppliers' indicative sourcing footprint compared with FY23. The map indicates that Australia remains the key sourcing country, followed by the US, China, Singapore and New Zealand. However, the overall indicative volume of suppliers has increased in FY24 across each country and the map provides an illustrative example of how the geographical footprint of our supply chain expands at tier two level and below.

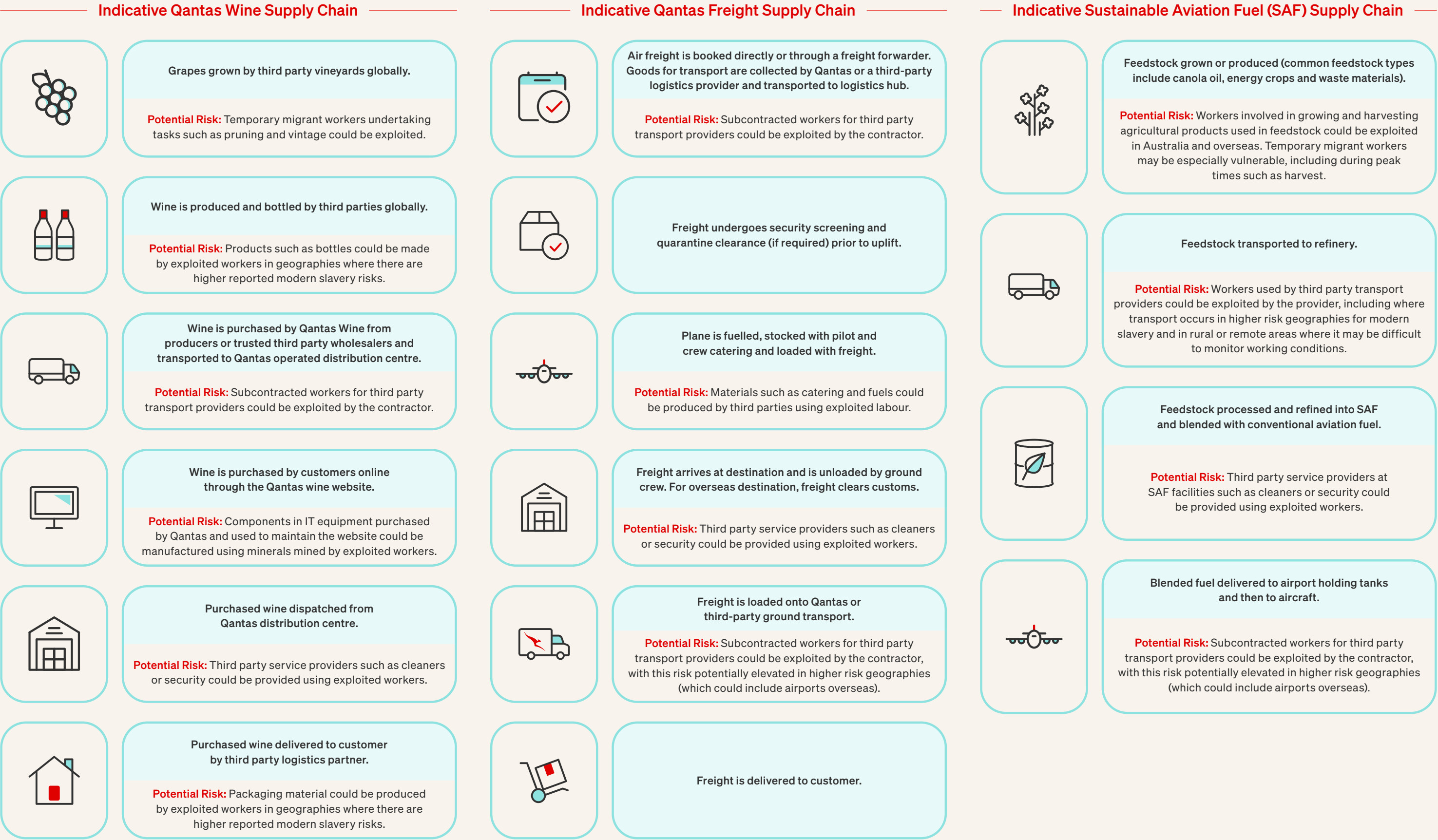
⁷ Source country refers to the country/s identified across the multi-staged due diligence process and is based on information provided by the sourcing business unit or by our tier one supplier nominating the countries of their operations and/ or the countries from where they will source the products 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.

Our Suppliers' Sourcing Footprint — Indicative Overview



This analysis helps us to understand the geographic footprint of our supply chains below tier one. For example, we source uniform items through a supplier in Australia which are manufactured at tier two factories across a range of countries including Indonesia, Sri Lanka, Fiji, India, Taiwan and Bangladesh. The visual below set out at an indicative level, how potential modern slavery risks may be present below tier one, in the supply chains we use.

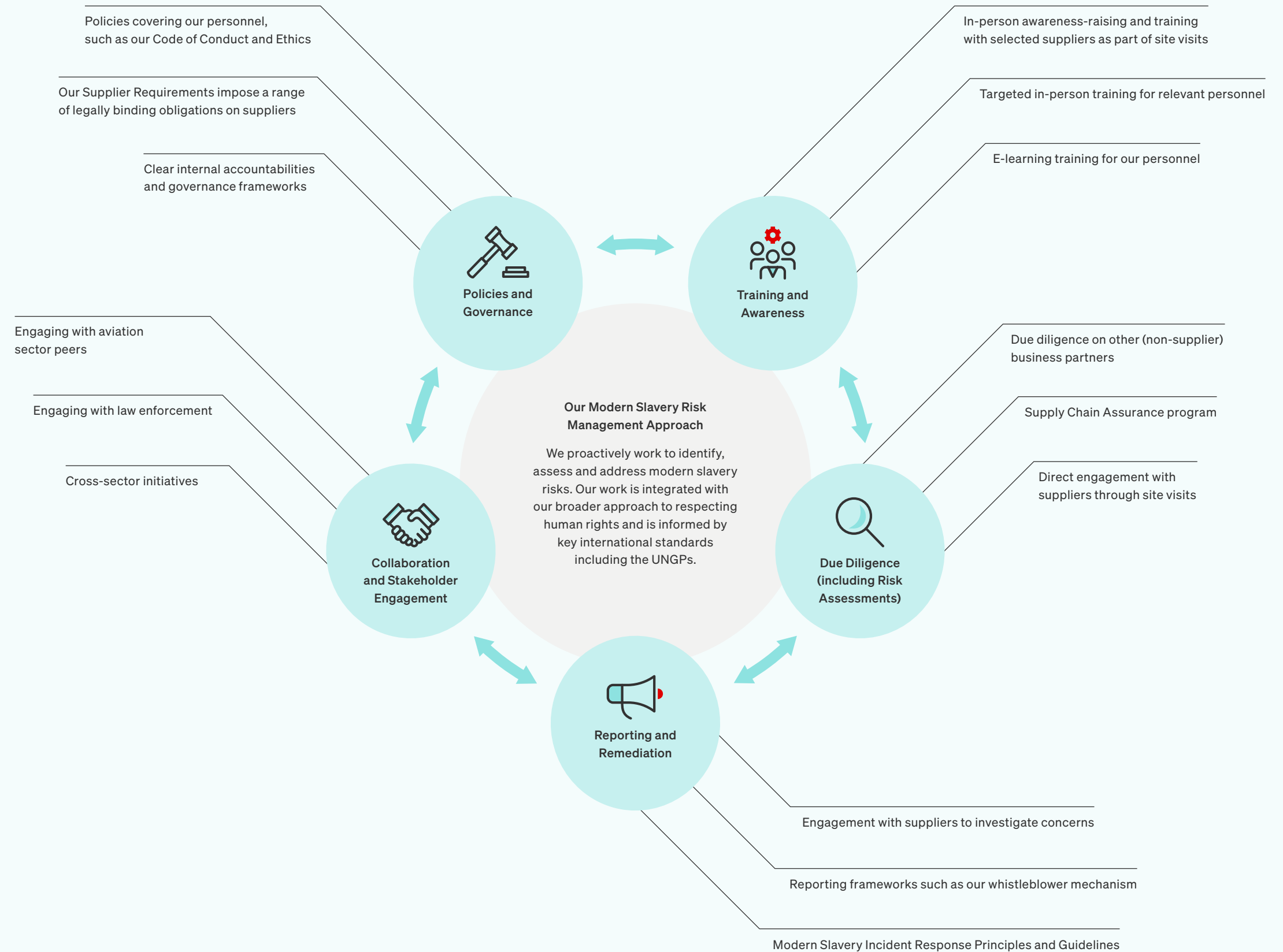
It is important to note, this visual is intended as an indicative example only and is not representative of the end to end supply chain, or the people and processes involved. Indicative risks are examples only.



Section 4: How We Manage Our Modern Slavery Risks

Our Approach

Our modern slavery response is based on five key elements, as shown in the adjacent diagram. Together, these form the foundation of our actions to manage modern slavery risks. The following sections explain our work across each of these areas. We take a continuous improvement approach, which includes regularly looking for opportunities to strengthen our approach across each area.



Governance and Management

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.

The Qantas Board of Directors (**the Board**) oversees the adequacy and effectiveness of the corporate governance framework. Throughout FY24 it was assisted by four Board committees:

- **Safety, Health, Environment and Security Committee (CHESS):** responsibilities include oversight of the Qantas Groups operational risks (safety, health, environment, security and business resilience);
- **Audit Committee:** responsibilities include oversight of enterprise-wide risk management, which includes sustainability risks (other than those which fall under CHESS), as well as legal and regulatory compliance;
- **Remuneration Committee:** responsibilities include consideration of sustainability metrics in incentive plans; and
- **Nominations Committee:** responsibilities include oversight of inclusion and diversity.

The 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 SCA program, including modern slavery risk.

The Board receives an annual Group Policy Framework update, which includes a global environmental scan, including human rights legislative developments, trends and themes, as well as relevant actions taken by the SCA during the year.

The Board also approves relevant Group policies, which provides additional opportunities for engagement on modern slavery and broader human rights issues. For example, during the reporting period, the Board endorsed the Group’s updated Human Rights Policy Statement.

To deepen our engagement and further enhance Director education on this topic, in FY24 we scheduled a strategic and awareness raising briefing, to the Board on modern slavery and broader human rights. This was delivered in early FY25 by Pillar Two, a specialist business and human rights advisory firm, together with our internal human rights subject matter expert (**SME**).

Management’s responsibilities

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 BIC function leads the risk assessment, while accountability for managing the risk is embedded in the business, as described in our governance framework.

Responsibility for broader human rights issues sits across the business. For example, health, safety and wellbeing sits with the Chief Risk Officer, modern slavery sits with the General Counsel and Group Executive, Office of the CEO, and inclusion and diversity with the Chief People Officer. Governance and management of these issues is the responsibility of a range of management committees and forums.

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

Our governance framework



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 enterprise-wide 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, including the Sustainability framework, which includes respect for human rights.



Supply Chain Assurance Leadership Council

Responsible for oversight of the effective implementation of the Supply Chain Assurance program, including modern slavery risk management and risks rated medium and above. 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.



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, Sanctions, Cyber Security and Work Health and Safety.



Business Integrity and Compliance (BIC)

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 BIC. Group Procurement supports any supplier contractual escalations.

As part of our governance approach, 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.

More information about the policies shown in the diagram below and how we implement them is set out in Appendix 3.

We are committed to continually improving and refining our 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 and in FY24 we continued to strengthen our Policy framework by:

- revising our Code of Conduct to explicitly reference the responsibility of our personnel to demonstrate the respect of human rights in all interactions with others in the course of performing their role. This built on revisions made in FY23 to ensure due diligence is undertaken to identify assess potential human rights risks that may arise

through business activities, supplier and business partner relationships, and reporting any actual or suspected instances of Modern Slavery risk in our operations or value chain.

- revising our Human Rights Policy Statement. Following a review of the Policy Statement by our internal human rights SME and consultation with an expert business and human rights advisory firm, we made a number of amendments to help ensure the Policy Statement remains fit for purpose. These included expanding our commitments to safeguard the safety, welfare and wellbeing of children and to respect the right to a clean, healthy and sustainable environment. The updated Policy Statement was endorsed by our Board and signed by our CEO.
- integrating our Supplier Code of Conduct into our third-party risk management system (**Exiger**) as an additional means of communicating our expectations to Suppliers. This means that when responding to our DDQ, Suppliers acknowledge receipt of our Supplier Code of Conduct.



Our Approach to Third Parties

We hold a range of third-party relationships that may not constitute a customer/supplier relationship. In these instances, our contracts typically include our Group Compliance Statement which includes specific clauses on modern slavery, and where of an equivalent standard, the parties may agree to mutually recognise its respective Code of Conduct. Otherwise, we endeavour to have the third party acknowledge our Supplier Code of Conduct.

Modern Slavery Training and Awareness Raising

Training and awareness-raising are core components of our approach to managing modern slavery risks. During FY24, 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.

Targeted Training for our Customer Product and Service Team

We also provided tailored in-person training to more than 20 members of our Customer Product and Service team whose responsibilities include sourcing of products and services provided to our customers ranging from pyjamas, amenity kits, catering, and lounge products to non-consumables such as cabin galley equipment. This training included content from our general awareness training (described above), as well as targeted guidance to support team members to apply our new modern slavery indicator assessment tool during site visits (see page 17). The training was delivered by our internal human rights SME.

Tailored Training for Jetstar

As part of broader work assessing employment practices in South-East Asia, we engaged with key personnel from Jetstar to raise awareness about the human rights implications of recruitment and related fees paid by workers. Facilitated by a third-party business and human rights advisory firm, this session included guidance about relevant international standards and hypothetical examples of how human rights harm could occur in this context. Following this, Jetstar worked with our labour hire providers to refine our requirements in key contracts

Face-To-Face Training for Aircrew

In FY24, we continued to provide face-to-face and online training on human trafficking risks to our aircrew. 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 and as it forms part of mandatory security training, our aircrew are unable to operate unless they are current. Across FY24, more than 9,100 of our cabin crew and pilots completed this training, the majority of which was face to face, with some recurrent training delivered online.

E-Learning Module

During the reporting period, we launched 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 ‘Acting with Integrity’ training program and includes information about types of modern slavery practices 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 based on practical scenarios. During FY25, the training will become required learning for all personnel.

Support for our Suppliers

We engage with selected suppliers to support them to build their understanding of modern slavery and broader labour rights issues. For example, during FY24 we visited two supplier sites in India (see case study on page 17) and 11 different factories in China. As part of these supplier visits in China, our team engaged with factory owners and managers and deployed our new modern slavery indicator tool (see page 17) which also provided an opportunity to raise awareness of potential modern slavery risk indicators and our expectations. We also delivered an in-person training session about modern slavery and human trafficking to the senior management and other selected employees of a supplier in India. This session included information about modern slavery, potential modern slavery risks and red flags, including human trafficking and our expectations for suppliers.

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 SCA program, launched in 2018, is a risk-based program which is aimed at assessing the potential compliance risks and ethical business conduct standards of third parties providing products or services to the Group, including modern slavery risks.

The SCA program 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 in their operations. The SCA program applies to all suppliers managed through the centralised Group procurement function.

During FY23 and FY24, we ran a specialised program of work to identify, prioritise and assess suppliers who were onboarded prior to the SCA program launch in 2018. A segmentation model was developed to prioritise the assessment of these suppliers (which drew on key criteria such as country and category) in order to identify and prioritise suppliers that are more likely to present an elevated level of risk.

The program concluded in April 2024 and as a result, most of our active suppliers have now been assessed. However, our supplier base is dynamic and we will continue to apply this model on an ongoing basis.

Since program inception, more than 12,000 assessments have been performed across our supplier base. This number includes the periodic reassessment of some existing suppliers, who may have presented an elevated level of risk, or where a change in circumstance had occurred.

We recognise that the most significant risks of modern slavery may be present at tier two or below in our supply chain, where we have less visibility of working conditions and sub-supplier practices (see indicative examples on page 11). 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.

Where non-conformances have been identified, we also require the supplier to provide evidence that the issue has been addressed, or that there is a corrective action plan in place and progress to address the issue is being monitored. We may also undertake site visits to factories at tier two and below (see page 17).

In FY24, two potential suppliers assessed via our SCA program were not approved for onboarding. Through our due diligence we identified a supplier who employed children younger than 15 years of age in another part of their business, which although not intended to service the Group, did not meet our standards. Due diligence of another supplier identified rostering and wage payment issues.

Key reflection

A key due diligence challenge in the aviation sector may arise in circumstances where a supplier may provide services at multiple airport locations. In some cases, the parent supplier operating at major airports may appear to have mature processes and controls in place which it indicates are applied across its entire operations. However, its operations at regional ports may be less mature due to the part time or ad hoc nature of the services provided, or in some instances have introduced localised processes. For example, at some regional Australian ports that receive a small number of flights, ground handling or security services may only be required intermittently either for a short period in the morning and again in the evening. This means the suppliers providing these services and their workers may also undertake other roles outside of the airport. We are refining our due diligence approach to ensure that these complexities are considered when evaluating suppliers.

Supply Chain Assurance (Modern Slavery Risks) — Statistics FY24

2,300⁸
Suppliers
assessed through
SCA program

1030+
Suppliers subject
to preliminary risk
assessment

100+
Suppliers progressed
to advanced due diligence/
desktop review

3⁹
New suppliers
assessed and monitored
as medium risk

6¹⁰
Suppliers
reassessed from
medium to low risk

13¹¹
Suppliers
monitored at medium
risk 30 June 24

8 This number represents the total number of suppliers assessed through SCA, both parent and child entities and across all risk categories, and includes assessments for new and reassessments for existing suppliers, as well as some suppliers assessed through the Unassessed Supplier Program.

9 Currently there are no suppliers at tier one in our supply chain assessed as having a residually high modern slavery risk.

10 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.

11 This is the total number of suppliers assessed as medium risk and includes suppliers assessed both within and outside this reporting period. A rating of medium does not mean instances of modern slavery have been identified. As an example, circumstances where a medium rating may be applied could include (but not limited to):

- an independent social audit of a tier two (or below) supplier has identified areas of non-conformance (but no evidence of modern slavery) and the factory is subject to a corrective action plan and monitoring; or
- a supplier has declined to participate in due diligence or has provided insufficient evidence during the due diligence process and while no modern slavery indicators have been identified, our BIC team have applied a medium rating based on the inherent country risk and nature of the products or services provided.



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. In more detail, the six pillars are:

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), the supplier details are entered into our third-party technology platform (Exiger) and the risk is triaged by the BIC risk SME. 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 utilise indices from reputable third party providers and consider data and information made available through the Walkfree Global Slavery Index and other organisations such as the Global Compact Network Australia and the Transparency International Corruption Perceptions Index.

2 Assess

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 BIC 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 policies and processes to prohibit child, forced or bonded labour, age verification processes and whether children are permitted onsite. It also includes questions on employment practices such

as recruitment fees, 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 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. Lack of access to alternative suppliers, or suppliers failure to respond meaningfully to requests for information may also affect our ability to exercise or build our leverage to effect change in suppliers’ behaviour in some contexts despite our engagement efforts. For example, six of the medium risk suppliers monitored during the reporting period relate to areas of our operations where the Group has no identifiable alternate supplier. Having regard to jurisdictional due diligence challenges, we continue to explore how we may use other avenues for engagement with these suppliers.

3 4 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. Our contractual

arrangements, Supplier Requirements and Supplier Code of Conduct clearly communicate our expectations of suppliers to conduct their activities in compliance with applicable laws and in a manner that respects the human and labour rights of their workers. We place a requirement on our tier one suppliers to take reasonable steps to identify, prevent, mitigate and remediate any harm, and to implement policies, processes and procedures to undertake those activities. We also require our tier one suppliers to communicate the expectations of the Supplier Requirements to sub-suppliers and subcontractors involved in providing products or services to Qantas. Further information about our Group specific remediation processes is set out in the following section.

6 Monitor

We understand that effective modern slavery risk management is not a one-time evaluation, and may require active mitigation, remediation and active monitoring. In some instances, the Group will undertake site visits to achieve this (see page 17). Additionally, 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.

Engaging With Our Suppliers Through Site Visits: Key Reflections

Engagement by companies with their suppliers about human rights issues has been identified as a key area for improvement by global benchmarks, including the Corporate Human Rights Benchmark. During FY24, we continued to prioritise engagement with selected tier one suppliers. This included in person visits by representatives from our BIC team to two supplier sites in India where people labour was being provided to support our operations, and separate visits by our Customer Product team to a supplier site in Thailand and 11 supplier factories in China.

This included a December 2023 visit to five factories (spread across one site) of a direct supplier and three sub-suppliers (tier two and below) in China; a visit to a cart production facility in Thailand and three tier two factories located in China of another supplier. During the 2024 visits, our Customer Product team applied our new modern slavery indicator tool (see adjacent case study).

These site visits provided valuable additional context for us about how our suppliers operate and where modern slavery and other broader human rights risks may be present. They also enabled us to build relationships and trust with key supplier staff, share our expectations, and strengthen suppliers’ own risk management capacity. For example, during one of the visits in FY24, we were able to provide modern slavery awareness training to the supplier’s senior leadership (see page 14) and on the following day, to other personnel in the company. One supplier also indicated to us that we were the only customer to ask to visit their site.

Typically, we find the greater scope for in-person engagement during site visits enables more meaningful dialogue and access to information about suppliers’ practices. For example, our engagement with a supplier in India during the reporting period enabled us to access documentation and other information from the supplier that we had not been able to obtain through desktop assessments. As a result, we were able to re-classify this supplier from medium to low risk. In FY23, our engagement with a tier two supplier in Thailand also enabled us to identify potential use of recruitment fees by a third-party agency (see page 21).

Supplier engagement through site visits has also supported us to build our understanding about different practical approaches to managing modern slavery risks, including identifying good practice initiatives that can inform our own responses. For example, during one FY24 site visit, we were briefed on the supplier’s grievance mechanism, which involved an online reporting tool developed in house that allows for anonymous reporting of concerns. The tool also allowed for detailed monitoring of the types of concerns raised and how they were escalated and addressed by the business.

We recognise that our supplier visits are not equivalent to social audits, however our site visits are designed to be less intrusive and more collaborative, while providing additional insights to supplement our risk management.



Development of Modern Slavery Indicator Tool for Supplier Visits

During the reporting period, we developed and implemented a modern slavery indicator assessment tool that Qantas personnel may use when undertaking supplier site visits.

The tool sets out a suite of questions related to modern slavery and broader labour rights issues using an ‘Expectation, Enquire and Observe model’. This model supports our people to understand what the expected standard is for each potential risk factor, suggested enquiries/questions they can ask and, what to look for during the site visit. The tool also allows for the upload of photographs (such as to show how posters about grievance mechanisms are displayed). This activity integrates with other areas of focus such as health and safety practices, product quality evaluation and commercial discussions. Once completed, the results are reviewed by the BIC team, and may inform further engagement with the supplier.

The questions included in the tool address a range of key areas relevant to modern slavery and wider human rights. These include: if the supplier uses third party recruitment firms; the working conditions on site (including any onsite accommodation); child and young labour (including age verification processes); if the supplier has any partnerships or contracts with correctional services or prisons for labour at the site; and whether and how grievance channels are made available to suppliers.

During the reporting period, we also provided modern slavery awareness training as well as tailored training in the use of the tool, to our Customer Product team who subsequently implemented the tool during visits to Thailand and China.

Key reflections: While the pre-announced nature of these visits means suppliers have an opportunity to prepare, often they expect to focus on showcasing product quality, rather than questions around work standards and labour related practices at the factory. This has highlighted the importance of taking a nuanced approach to supplier engagement that avoids a ‘one size fits all’ approach. For example, it may not be necessary for Qantas personnel to ask every supplier all of the questions in the tool. The timing of and way in which questions are asked can also be adjusted based on the context. For example, rather than working through questions in a formal interview style, the team found some questions could be asked more informally during site walk throughs or in some instances the criteria can be addressed through observation only. We are also continuing to review how the questions are phrased to help avoid repeating standard questions to which suppliers may be practiced in responding.

While we work to maintain strong relationships with our tier one suppliers, when visiting suppliers at tier two and below, effective engagement can be challenging. For example, when visiting a tier two supplier for the first time, it may be difficult for our personnel to find an appropriate balance between building trust with the supplier and asking detailed questions about their human rights response (including where language barriers may complicate communication).

However, we continue to see supplier visits as an important element of our work to manage modern slavery and wider human rights risks.

Expectation, Enquire and Observe Model

The tool sets out a suite of questions related to modern slavery and broader labour rights issue using a model based on:



This model supports our people to understand what the expected standard is for each potential risk factor, suggested enquires/questions they can ask and what to observe/look for during a site visit.

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 (as highlighted in our FY23 statement).

As with our suppliers, we recognise that our engagement with business partners may involve modern slavery and other human rights risks. In contrast to companies in some other sectors, as an airline we engage with a vast range of third parties. This can include airline partnerships, airline redemption agreements as well as agreements with other companies related to white-label products we offer through our Loyalty program, such as banking, insurance and hotel products. Additionally, human rights or modern slavery risks can arise through relationships formed by mergers and acquisitions or investment opportunities. The nature of these relationships are typically more strategic and commercial in nature, and differ from a typical sourcing relationship with our suppliers, including due to factors such as our degree of leverage (which may be lower than with suppliers) and the types of companies we partner with (who are typically larger mature companies, while the size and capacity of suppliers can vary significantly).

In recognition of the variance between our business partnership and traditional supplier relationships, during the reporting period, we continued to evolve our due diligence approach involving our business partners. This included developing and implementing a new questionnaire in Exiger tailored to our business partners which evaluates their governance, management system and approach to broader human rights. Across FY24, the BIC team also undertook two due diligence activities which included human rights, associated with potential merger and acquisitions. BIC will continue to work across FY25 to formalise the framework underpinning the due diligence approach for our third-party relationships.

Key reflections: The initiation of due diligence with our business partners provides a platform to both set early expectations of ethical business practices, including in relation to modern slavery and broader human rights, and enable an evaluation as to our partners' approach to managing the associated risks. Additionally, adopting a context specific approach to due diligence and risk assessment and fostering a shared partnership approach based on mutual commitment, enables more effective due diligence outcomes.

Implementing 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.

Our salient human rights issues help us to understand the areas of our operation and value chain where people may be most at risk of severe human rights harm. We completed our first salient human rights assessment in 2018 and refreshed this assessment in FY22 and FY23. This resulted in the identification of five salient human rights issues for Qantas, which we aim to use to help us focus our human rights risk management.

Following the refresh of our salient human rights issues, in FY24 our internal human rights SME worked collaboratively across the business with the relevant teams to identify and map the existing actions and controls across the business relevant to each salient human rights issue. This involved wide consultation and highlighted the range of steps we are taking to manage different human rights risks.

Key reflections: While we have identified a comprehensive range of actions we are taking to manage our salient human rights issues (including in relation to modern slavery), this activity identified that the management of the associated risks and actions may not always be explicitly understood as 'human rights' related. Going forward, we are exploring how we can better create the connection for our people between the relevant risks and associated human rights impacts.

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 tier one 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.

Reporting and Remediation

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

We know that maintaining trusted and accessible grievance mechanisms is key to building a "speaking up" culture. This is why we reviewed the effectiveness of our grievance mechanisms during the reporting period, which resulted in us identifying a range of opportunities to further strengthen our response. Further information about this review is included in the adjacent break out box.

During the reporting period, we did not identify any actual instances of modern slavery in our direct operations or supply chains. However, we understand that these practices may be deeply embedded in global supply chains and can therefore be challenging to detect. This has meant that we have not undertaken any steps to remediate identified instances of modern slavery in our operations or supply chains.

We understand that companies’ actions to remediate specific instances of modern slavery, 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 modern slavery risk management.

We also continued to cooperate with law enforcement and applicable regulators to support cross jurisdictional human trafficking investigations relating to our customers during FY24. More broadly, we also identified a number of instances where Australian and overseas suppliers had potentially engaged in substandard or inappropriate workplace practices. While these practices did not amount to modern slavery, they were inconsistent with our expectations. When these instances are brought to our attention, immediate steps are taken to understand and (where required) address any issues. Further detail about these matters is outlined on page 21.

 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. 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. In FY24, we updated our Whistleblower Policy to make express reference to the mechanism being available to employees, suppliers, workers in our supply chain and other stakeholders to report human rights grievances, including modern slavery. When investigating modern slavery-related matters received through these processes, we will apply our Modern Slavery Incident Response Principles and Guidelines, which draw on the expectations set out in the UNGPs (see page 20) (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.

 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 following our review of the effectiveness of our grievance mechanisms.

 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 operationalised by our suppliers, and the challenges in embedding mechanisms deeper in the supply chain.

 Complaints Received during FY24

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 behavioural matters were the main nature of allegations made via our Whistleblower channels in FY24. In FY24, we received and responded to four reports regarding matters occurring within our supply chain, while none of these related to modern slavery, one matter (which remains ongoing) related to alleged substandard work practices involving a supplier. Regardless of whether an investigation into any matter is able to substantiate an allegation, improvement opportunities may be identified and implemented, such as enhancements to training or processes. We are currently reviewing the way our Whistleblower program is provided, with the offer of additional language capabilities included in the scope of that review. Across FY25, we will commence work to implement key findings and recommendations from the review of the effectiveness of our grievance mechanisms to help ensure our Whistleblower program is an accessible and trusted channel to report matters of concern for all personnel within the Qantas Group and across our value chain.

Reviewing the Effectiveness of our Grievance Mechanisms

Grievance mechanisms are processes that enable the reporting of human rights impacts, such as modern slavery, and facilitate the remediation of any identified harm. There are different types of grievance mechanisms, including mechanisms that are set up by individual companies, such as Qantas. In order to be effective, these grievance mechanisms need to be trusted by, and accessible to, workers and other stakeholders. The UNGPs set out a series of criteria for effective, company-level grievance mechanisms, including that they are legitimate, predictable, equitable and transparent. During the reporting period, we partnered with an expert business and human rights advisory firm to review the effectiveness of our grievance mechanisms against the UNGPs’ effectiveness criteria. As part of this process, we undertook a series of interviews with key business functions who play a role in managing and responding to grievances and reviewed relevant documents, including guidance around investigations. Importantly, the review considered how we respond to grievances raised by our own staff, as well as grievances from external stakeholders, such as suppliers’ workers.

This review highlighted key elements of our grievance mechanisms that support their effectiveness. This includes the use of documented policies which are regularly reviewed, provision of information about these mechanisms to our people through training and other fora, and cross-functional collaboration between key business functions during the investigation of complaints (including with our human rights SME).

Through the review, we have also identified important opportunities to further strengthen the effectiveness of our grievance mechanisms from a human rights perspective. For example, the review highlighted the importance of considering what reporting channels may be most appropriate for suppliers’ workers and the possible barriers that may limit these workers’ ability to utilise frameworks, such as our whistleblower mechanism.

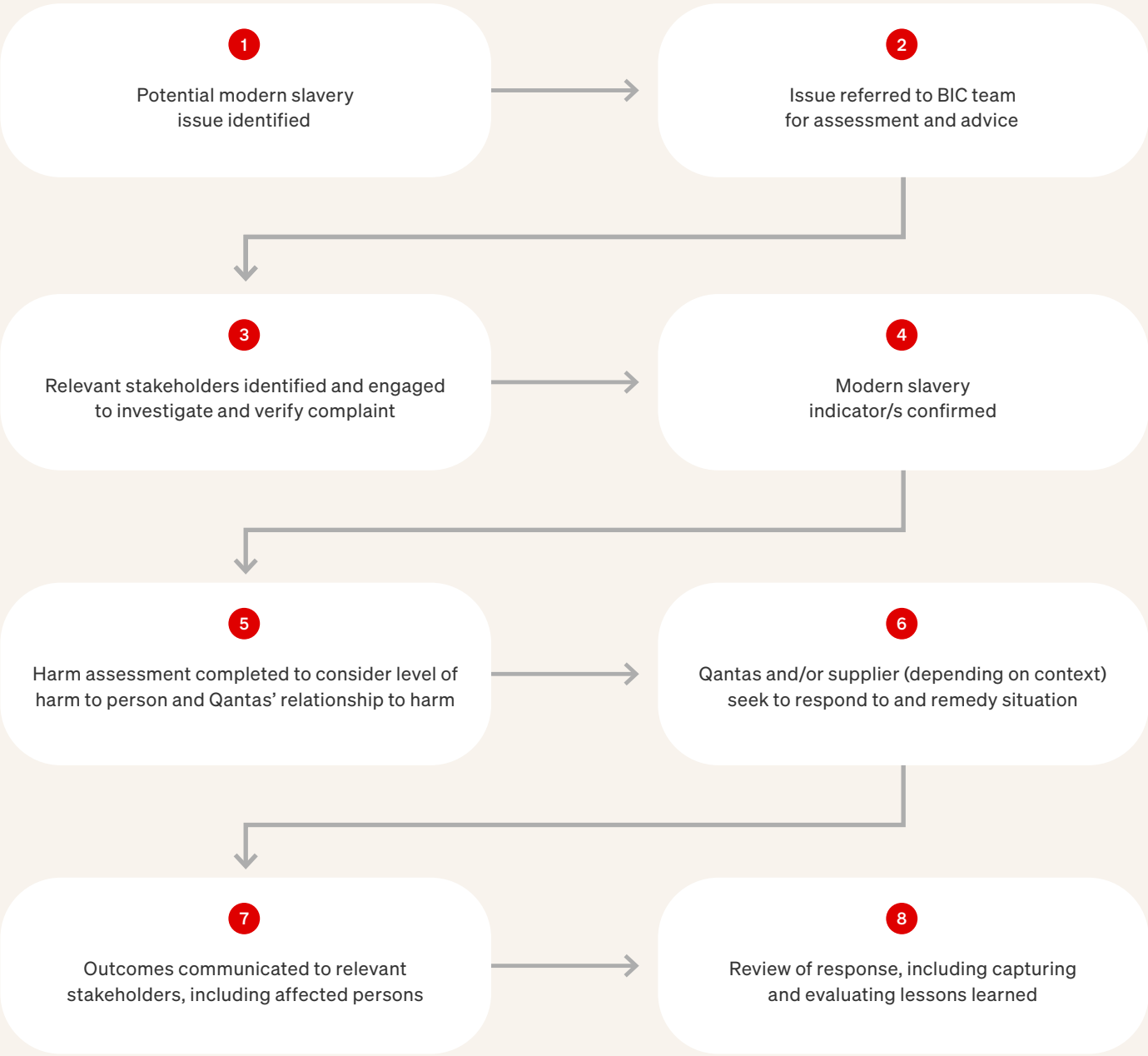
We are also exploring lessons from developing grievance mechanisms in other contexts, such as our work to establish a Safe Space reporting channel designed for reporting sexual misconduct at work or in connection with work. This channel allows employees and contractors (employees) to contact Safe Space and receive immediate support to help ensure their safety and wellbeing, while also providing a reporting model that is predicated on a human-centred, trauma-informed approach.

Our Modern Slavery Incident Response Principles and Guidelines

Our detailed Modern Slavery Incident Response Principles and Guidelines (MSIRP) were developed in FY23 and identify key steps the Group may take to manage and respond to a potential case of modern slavery identified in our operations or supply chains. The development of the MSIRP was informed by the UNGPs and other relevant standards. The below flowchart sets out the key steps from our MSIRP.

The MSIRP is managed and overseen by our BIC 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 14).

Modern Slavery Incident Response Principles and Guidelines



Engaging with Our Suppliers to Address Reports of Substandard Workplace Practices

While we did not identify any instances of modern slavery during the reporting period, we did work to address reports of substandard working practices relating to two separate suppliers. Both of these instances occurred in Australia.

In the first instance, a Qantas Group team member undertaking a site visit was approached by a supplier’s worker who indicated that they did not think they were being paid correctly. This complaint was escalated internally by our team member to BIC for further assessment. This preliminary assessment suggests that some of the supplier’s workers did not appear to be rostered in accordance with the relevant award and were paid inconsistently with the relevant award’s requirements. No specific modern slavery indicators were identified. We subsequently sought to engage with the supplier, including by providing the supplier with access at our cost to an external firm and payroll specialists to formally investigate and address the issues identified.

In the second instance, an anonymous whistleblower complaint was made by a supplier’s worker which, while no modern slavery indicators were identified, included allegations of non-payment of overtime rates and other substandard practices, including staff being required to work alone due to staff shortages and poor fatigue management. The complaint also alleged that some workers were working extended hours and had been required to sign individual flexibility agreements waiving their right to overtime payments.

In circumstances where a complaint has been made anonymously under whistleblower protections, investigations can be challenging. We have identified a potential alternative way to gather information that may support the investigation while retaining confidentiality of the disclosure and this work is continuing across FY25.

Key reflections

Both of these incidents occurred in Australia, which underscores the importance of monitoring and engaging with suppliers both on and offshore and not focusing solely on offshore risks. One incident was reported through our whistleblower mechanism, which helps to give us confidence that suppliers’ workers may feel comfortable reporting workplace concerns in this way. The other incident was reported directly to a Qantas team member onsite, which demonstrates the value that on site visits can provide, including to gain insight into work conditions and as an avenue for informal reporting pathways. It highlights that appropriate training provided to personnel to recognise and respond to red flags and other concerns raised by suppliers, may support a company’s response protocols.

Evaluating Potential Charging of Recruitment Fees in Our Supply Chain

In FY23, we reported on our engagement with a tier two supplier in Thailand. Through a site visit, we were able to obtain documentation about the supplier’s recruitment practices, including the use of recruitment agencies. Further assessment has indicated that while the tier two supplier appears compliant with local law, some workers may potentially have been charged recruitment fees in connection with their employment by third party recruitment agencies in their source country.

We are continuing to work closely with our direct supplier to investigate this issue. The supplier has also engaged an external specialist with experience in this area to support this process. To date, the external specialist has undertaken initial interviews

with approximately 20 workers with support from independent translators, however these initial interviews identified the need to expand the breadth of interviewees and this activity remains in progress. In parallel with this process, the specialist has identified opportunities to uplift the policies, process and controls around migrant recruitment, and our direct supplier continues to engage with the tier two supplier to build awareness and capability in this area and influence adoption of the strengthened approach.

Key reflections

Verifying whether payment of recruitment fees has occurred is a lengthy and time-consuming process and requires building trust with both suppliers and workers, as

well as the recruitment agencies involved. It becomes increasingly complex where the practice may be permitted by local laws and involves cross-border recruitment and multiple agencies. In some cases, workers may not be familiar with the concept of ‘recruitment fees’ making it important to establish a common understanding of terms used. Additionally, workers may have been recruited through different pathways and at different times. For example, in this case our understanding is that in line with local law and labour provisions, some workers may have been recruited directly by the factory from overseas, while other workers sought employment at the factory after leaving a previous employer who had recruited them from overseas.

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 advises that across FY24 it received 382 reports of human trafficking and slavery. This means that it is important that our people are equipped to safely identify and report human trafficking and 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.

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. This included providing materials to both Australian and Indonesian authorities in the course of a human trafficking investigation, which ultimately led to a man in Australia being charged with allegedly

trafficking a child from Indonesia to engage in sex work, and the arrest of a woman in Jakarta who was allegedly helping recruit women to travel to Australia and was charged with human trafficking offences.

Across FY24, we continued our engagement with the Australian Federal Police (AFP) on its “Look-A-Little-Deeper” training and awareness program, including participating in meetings and workshops with a range of aviation participants at Brisbane Airport.

Collaboration and Stakeholder Engagement

No singular organisation, business or person can tackle modern slavery in isolation and collaboration is a key component of our modern slavery response. We understand that effecting positive and sustainable change requires collective cross-sectoral and multi-agency action. This is why 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.

The table in Appendix 4 also outlines our broader range of stakeholders with whom we engage on a wide range of issues (including human rights and 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 (MCOP). During the reporting period, members of the MCOP engaged in discussion on issues which included the intersection of climate change and modern slavery, and countering modern slavery, people smuggling and human trafficking. Qantas also sponsored the August 2023 and June 2024 UNGCNA Australian Dialogue on Business and Human Rights, including participating as a co-panelist in a discussion on progress at the international level and what it means for Australian business.

MODERN SLAVERY AVIATION FORUM

Across FY24, representatives from Qantas, Virgin Australia and Air New Zealand jointly established the Modern Slavery Aviation Forum (MSAF). The aim is to provide a forum to collaborate with peers to address industry challenges and share key tools and learnings to address modern slavery risks. The operations of the MSAF are subject to relevant competition law frameworks. The MSAF met twice during the reporting period, including to discuss topics such as approaches to supplier due diligence and opportunities to raise awareness of human trafficking across the sector.



Qantas maintains dialogue with the Government and its agencies on a broad range of issues. During the reporting period for example, we continued to engage 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. At the state level, we also participated in the New South Wales (NSW) Anti-Slavery Commissioner’s inaugural modern slavery forum. This included taking part in a panel discussion around supplier engagement as a co-panelist with the NSW Anti-Slavery Commissioner.



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 14). We continue to explore opportunities to engage with IATA and other airlines on human trafficking initiatives. We have also historically participated in consultations around human trafficking arranged by the International Civil Aviation Organisation.

Section 5: How We Assess our Effectiveness

For the Group, being effective in managing modern slavery risks means that we can effect positive change through our processes and actions and be able to demonstrate and communicate how we do so. Our BIC 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.
- 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.

Assessing Effectiveness:

One of the key steps we took to assess our effectiveness over the reporting period was to undertake an internal audit of our modern slavery response. This detailed process included an in-depth review of the key elements of our response, including interviews with key team members and an assessment of key policies and processes. It also assured our FY22 and FY23 statements and did not identify any exceptions.

The internal audit identified opportunities to enhance our response, including by strengthening our governance and the Board’s oversight of our broader modern slavery response (outside the supply chain), identifying processes to continually improve our approach to training; and recommended we review the effectiveness of our grievance mechanisms, which was completed during the reporting period (see page 19).

A summary of the internal audit findings and actions were presented to the Board Audit Committee in June 2024 and action plans to address agreed recommendations are in place and monitored by internal audit to completion.

Core Component of our Response	Indicative Assessment Criteria/KPIs	How We Assess our Effectiveness	Key Outcomes
Robust standards that set clear expectations for workers in our operations and supply chains and are meaningfully communicated to workers, suppliers and other stakeholders.	— Our policy frameworks are fit for purpose and meaningfully implemented. — Our modern slavery risk management response aligns with good practice across sectors and responds to new and emerging issues.	— Periodically reviewing key policy frameworks to assess whether they are fit for purpose. — Considering feedback from suppliers, investors and other stakeholders, including benchmarks, to identify opportunities for improvement.	— We updated our Human Rights Policy expanding our commitment to key human rights issues (see page 14). — Integrated our Supplier Code of Conduct into our DDQ as an additional means of communicating our expectations to suppliers (see page 14). — We undertook an internal audit of our modern slavery response (See below). — We provided training to an offshore supplier about modern slavery and our expectations (see page 14).
Meaningful risk assessment and broader due diligence processes that enable the accurate and timely identification and prevention or mitigation of potential modern slavery risks.	— Our risk assessment processes accurately identify our modern slavery risks. — Our due diligence processes enable us to identify and manage modern slavery risks relating to suppliers and other third parties. — Our training programs equip our people to understand and manage modern slavery risks, including safely reporting concerns.	— Periodically refreshing our salient human rights issues to help ensure they continue to reflect our risk profile. — Revising our risk triggers, as required, to respond to the evolving risk environment. — 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. — Tracking completion rates for our training and monitoring feedback from participants.	— We mapped the existing actions and controls we take and controls in place to manage our salient human rights issues (see page 18). — We developed and implemented a new modern slavery indicator assessment tool for use during supplier visits (see page 17). — We implemented our expanded DDQ to include further questions on child labour and age verification processes, use of recruitment agencies, subcontracting, as well as grievance mechanisms, and updated the risk modelling in our system (see page 16). — We developed and implemented a DDQ tailored to our partnership relationships i.e.: those outside the supply chain (see page 18). — 6 suppliers in the reporting period were re-evaluated from medium to low risk for human rights (see page 15).
Trusted and accessible grievance mechanisms to facilitate the reporting and remediation of modern slavery-related complaints.	— Relevant stakeholders trust and are able to access our grievance mechanisms. — Any modern slavery related complaints received are appropriately identified and investigated. — Where we identify we have caused or contributed to human rights harm, we provide for or cooperate in remediation.	— Monitoring the number of modern slavery and broader human rights complaints received, to help us understand whether our grievance mechanisms are trusted and accessible. — Reviewing the operation of our grievance mechanisms, including through internal audits.	— We reviewed the effectiveness of our grievance mechanism against the expectations set out in the UNGPs to identify opportunities to further enhance our response (see page 19). — We revised our Whistleblower Policy to include explicit reference to reporting of human rights grievances (see page 19). — We engaged with a number of suppliers to further investigate potential issues such as possible charging of recruitment fees and complaints of substandard working conditions (see page 21).

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

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 entities covered by the Statement, as well as owned and controlled entities across the Group.

A final draft of the Statement was made available to each of the reporting entities and the other owned and controlled entities covered by this Statement, prior to publication.

In addition to the consultation process to develop the Statement, all entities across the Group work closely on an ongoing basis to implement and monitor our modern slavery risk management approach, including through our SCA activity.

Our Whole-of-Group Consultation Process

The BIC 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, Group Sustainability, 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.

The Statement was reviewed by the Group General Counsel, Chief Corporate Affairs and Communications Officer, the Acting Chief Sustainability Officer, and an independent specialist business and human rights advisory firm, and was endorsed by the Group CEO and GLT, before being reviewed and approved by the Board.

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.

Consultation with Reporting Entities

In addition to the cross-functional consultation process outlined, we consulted with the Qantas Group Company Secretary as a representative of each reporting entity. Separate consultation was also undertaken with senior leaders of other reporting entities covered by this Statement, including Jetstar Group, Qantas Freight, Qantas Loyalty and Taylor Fry.

We used this additional consultation to inform our understanding of any changes since FY23, and to confirm their endorsement for the preparation of a joint Statement on their behalf by Qantas. This process also provided an opportunity to raise awareness of the actions that are undertaken at a Group level to identify, assess and manage potential modern slavery risks and the role these reporting entities play in supporting these actions.

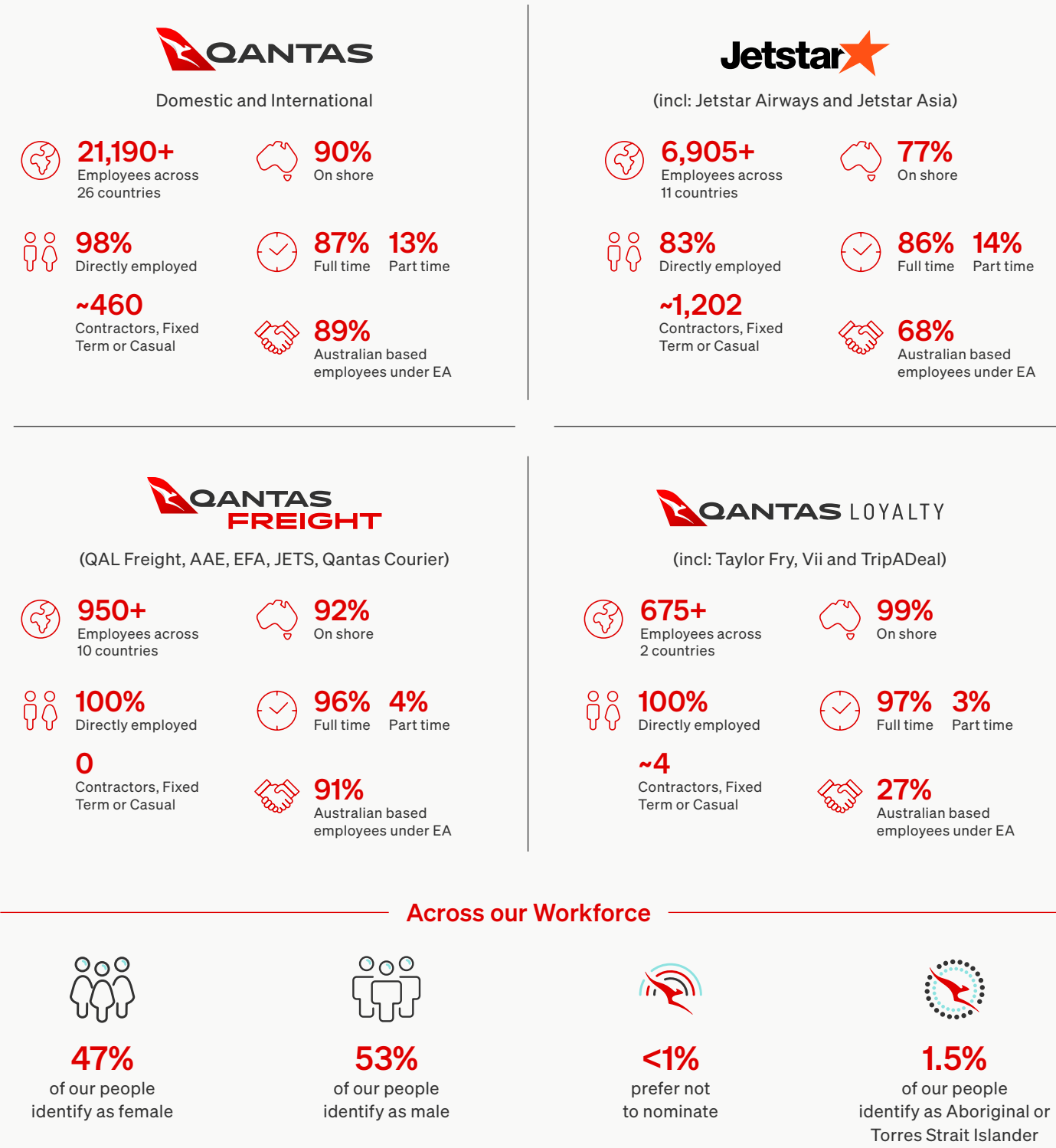
Consultation with Owned and Controlled Entities

Our owned and controlled entities within the scope of this Statement were consulted on a draft of the Statement at Director and Company Secretary level.



Appendix 1: Our Workforce

Our global workforce consists of more than 29,000 (FY23: 27,000)¹² employees across 27 (FY23: 27) countries, two of whom 94 (FY23: 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.



Appendix 3: Policy Framework

Policy	Relevance to Modern Slavery	How we implement this Policy
Human Rights Policy Statement	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 was updated during the reporting period (see page 14) and 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.
Qantas Group Code of Conduct and Ethics	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 or other exploitation 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 was revised during the reporting period (see page 14) and 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.
Board approved Non-Negotiable Business Principles, referenced in the Qantas Group Business Practices Document	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, reiterating our commitment to respect human rights, including in relation to modern slavery. It also sets out that we condemn all forms of exploitation of children and support the elimination of exploitative child labour and underscores our expectation that our people consider our risks of involvement in actual or potential human rights impacts and report potential risks to BIC.	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.

Policy	Relevance to Modern Slavery	How we implement this Policy
Whistleblower Policy	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.
Supplier Code of Conduct	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 for suppliers to respect human rights and prohibit in their operations and supply chains, all forms of modern slavery. It also sets our broader expectations relating to labour standards including wages and benefits, safe and fair workplaces, including in relation to freedom of association, rest periods and freedom from discrimination and harassment. The Supplier Code of Conduct also prohibits the withholding of workers’ identity documents and the charging of recruitment fees, and requires 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.	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. Additionally, suppliers who interact with Exiger during due diligence, automatically receive the Supplier Code of Conduct during this process. In some cases, we may also include it as part of our contracting agreements.
Supplier Requirements	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.

Appendix 4: Stakeholder Engagement

While pages 17 and 21 outline how we engage with stakeholders on human rights and modern slavery, we also have a wide range of stakeholders with whom we engage with regularly in many different ways on a broad cross section of issues, including human rights (and modern slavery). The selection of stakeholders included below is based on their ability to impact Qantas, as well as our impact (or potential impact) on them.

Key stakeholder group	How we engage
 Employees	Weekly newsletters and specific updates from executives and managers; frequent updates to intranet sites, internal social networks and internal broadcast system; company-wide live-streamed town halls; employee networks; company-wide executive roadshows. QantasLive, launched June 2024, monthly interview with our CEO via live stream.
 Customers	Direct interaction with crew, airport and contact centre teams; electronic communication, including through email and text messages; the Qantas and Jetstar websites and apps; research forums; Qantas magazine, both hard copy and online; advertising through a variety of channels; social media platforms.
 Shareholders and investment community	Direct investor engagement throughout the year; half-year and full-year results announcements; Annual General Meeting; annual reporting; investor roadshows; releases to the Australian Securities Exchange (ASX).
 Suppliers	Supplier governance including site visits, audits and onboarding/training (as applicable); Supply Chain Assurance program; Supplier Requirements and Supplier Code of Conduct; member of Supply Nation. More information on how we engage with suppliers can be found on in the case studies on pages 17 and 21.
 Communities	Support for community organisations, including not-for-profit groups and charitable partners; support in times of natural disaster or crisis; connecting communities, including through reduced fares to some regional cities.
 Government and regulators	Regular engagement on key issues impacting aviation and on other issues more broadly, either directly or through industry associations.
 Aviation and tourism industry	Regular engagement with aviation and tourism bodies (including national and state tourism organisations) and industry councils on key issues and collaborative opportunities to promote regional, domestic and international tourism.
 Unions	Regular engagement with unions who represent our employees, noting the terms and conditions of approximately 84.5 per cent (offshore and onshore) of our employees are set through enterprise agreements. Qantas recognises and supports the rights of freedom of association.

Appendix 5: List of Reporting Entities and Owned or Controlled Entities

AAL Aviation Limited¹³ (83 008 642 886) The principal activities during the period were that of a non-operative holding company.	Network Aviation Pty Ltd¹³ (082 007 350) The principal activities during the period were to provide passenger air transportation services.	Qantas Information Technology Ltd¹³ (99 000 005 372) The principal activities during the period were to provide information technology services.	QF ECA A380 2011 No.1 Pty Limited¹⁴ (11 145 078 931) The principal activities during the period were to that of an aircraft leasing company.
Airlink Pty Limited¹³ (76 010 812 316) The principal activities during the period were to provide passenger air transportation services.	Network Holding Investments Pty Ltd¹³ (110 179 818) The principal activities during the period were that of a non-operative holding company.	Qantas Road Express Pty Limited¹³ (56 130 392 111) The principal activities during the period were to provide road transportation services carrying international air cargo.	QF ECA A380 2011 No.2 Pty Limited¹⁴ (19 146 437 774) The principal activities during the period were to that of an aircraft leasing company.
Australian Air Express Pty Ltd¹³ (74 054 307 336) The principal activities during the period were the provision of freight ground operation services.	Network Turbine Solutions Pty Ltd¹³ (20 110 180 008) The principal activities during the period were maintenance of Fokker F100 and Airbus A320 aircraft.	Qantas Ventures Pty Limited¹³ (55 622 616 611) The principal activities during the period were that of an investment holding company.	QF EXIM B787 No.1 Pty Limited¹⁴ (53 166 786 321) The principal activities during the period were to that of an aircraft leasing company.
Australian Airlines Limited¹³ (85 099 625 304) The principal activities during the period were that of a dormant non-operative company.	Osnet Jets Pty Ltd¹³ (99 128 559 419) The principal activities during the period were that of a dormant non-operative company.	Qantas Wheatbelt Connect Pty Limited¹³ (86 666 462 504) The principal activities during the period were that of an investment vehicle.	QF EXIM B787 No.2 Pty Limited¹⁴ (49 166 786 367) The principal activities during the period were to that of an aircraft leasing company.
Australian Regional Airlines Pty. Ltd.¹³ (25 006 783 633) The principal activities during the period were that of a non-operative holding company	Phone a Flight Pty Ltd¹⁴ (41 608 735 664) The principal activities during the period were that of a dormant non-operative company.	QF Cabin Crew Australia Pty Limited¹³ (46 128 382 105) The principal activities during the period were to provide cabin crew services.	Regional Airlines Charter Pty Limited¹⁴ (21 147 543 806) The principal activities during the period were to provide passenger air transportation services.
Eastern Australia Airlines Pty. Limited¹³ (77 001 599 024) The principal activities during the period were to provide passenger air transportation services.	Q H Tours Ltd¹³ (81 001 262 433) The principal activities during the period were that of an investment holding company.	QF A332 Leasing 1 Pty Limited¹⁴ (11 100 511 813) The principal activities during the period were to that of an aircraft leasing company.	Sunstate Airlines (Qld) Pty Limited¹³ (82 009 734 703) The principal activities during the period were to provide passenger air transportation services.
Express Freighters Australia (Operations) Pty Limited¹³ (54 119 093 999) The principal activities during the period were the employment, training and provision of personnel.	Qantas Airways Domestic Pty Limited¹⁴ (52 123 140 152) The principal activities during the period were that of an Air Operator Certificate holding company.	QF A332 Leasing 2 Pty Limited¹⁴ (13 100 511 886) The principal activities during the period were to that of an aircraft leasing company.	TAD Holdco Pty Ltd¹⁴ (90 637 674 376) The principal activities during the period were that of a non-operative holding company.
Express Freighters Australia Pty Limited¹³ (73 003 613 465) The principal activities during the period were to provide freight air transportation services.	Qantas Asia Investment Company Pty Ltd¹³ (26 125 048 044) The principal activities during the period were that of an investment holding company.	QF BOC 2008-1 Pty Limited¹⁴ (22 100 510 674) The principal activities during the period were to that of an aircraft leasing company.	Taylor Fry Holdings Pty Limited¹⁴ (63 604 441 483) The principal activities during the period were that of an investment holding company.
Impulse Airlines Holdings Proprietary Limited¹³ (67 090 590 024) The principal activities during the period were that of a non-operative holding company.	Qantas Courier Limited¹³ (32 003 890 328) The principal activities during the period were to provide domestic freight services within New Zealand.	QF BOC 2008-2 Pty Limited¹⁴ (35 100 510 727) The principal activities during the period were to that of an aircraft leasing company.	Taylor Fry Pty Limited¹⁴ (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.
Jetstar Airways Pty Limited¹³ (33 069 720 243) The principal activities during the period were to provide passenger air transportation services.	Qantas Domestic Pty Limited¹³ (21 134 556 255) The principal activities during the period were to provide cabin crew services.	QF Dash 8 Leasing No. 4 Pty Limited¹⁴ (91 135 258 445) The principal activities during the period were to that of an aircraft leasing company.	Trip a Deal Holdings Pty Ltd¹⁴ (97 617 898 263) The principal activities during the period were that of a non-operative holding company.
Jetstar Asia Holdings Pty Limited¹³ (86 108 623 123) The principal activities during the period were that of an investment holding company.	Qantas Freight Enterprises Limited¹⁴ (55 128 862 108) The principal activities during the period were that of a non-operative holding company.	QF Dash 8 Leasing No. 5 Pty Limited¹⁴ (31 149 204 713) The principal activities during the period were to that of an aircraft leasing company.	Trip a Deal Pty Ltd¹⁴ (50 149 240 433) The principal activities during the period were providing online travel agent services, specialising in tour based packages.
Jetstar Group Pty Limited¹³ (64 003 901 353) The principal activities during the period were to provide cabin crew services.	Qantas Frequent Flyer Limited¹³ (12 129 456 908) The principal activities during the period were that of a non-operative holding company.	QF Dash 8 Leasing No. 6 Pty Limited¹⁴ (35 164 390 238) The principal activities during the period were to that of an aircraft leasing company.	VII Pty Limited¹³ (83 619 963 263) The principal activities during the period were that of an IT Service Provider for gift cards.
Jetstar International Group Australia Pty Limited¹⁴ (17 152 774 395) The principal activities during the period were that of an investment holding company.	Qantas Frequent Flyer Operations Pty Limited¹³ (22 132 484 210) The principal activities during the period were that of a non-operative holding company.	QF ECA 2008-1 Pty Limited¹⁴ (71 133 356 475) The principal activities during the period were to that of an aircraft leasing company.	Qantas Freight Terminals Pty Limited¹⁴ (676 695 453) The principal activities during the period were to hold the Qantas Freight terminal leases.
Jetstar Services Pty Limited¹³ (19 107 638 326) The principal activities during the period were to provide airline ground services.	Qantas Ground Services Pty Limited¹³ (43 137 771 692) The principal activities during the period were to provide airline ground services.	QF ECA A380 2010 No.1 Pty Limited¹⁴ (14 145 079 312) The principal activities during the period were to that of an aircraft leasing company.	Qantas Superannuation Limited¹⁴ (47 003 806 960) The principal activities during the period were that of acting solely as a trustee of a regulated superannuation fund.
National Jet Operations Services Pty Ltd¹³ (33 055 887 575) The principal activities during the period were to provide cabin crew services.	Qantas Group Accommodation Pty Ltd¹³ (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.	QF ECA A380 2010 No.2 Pty Limited¹⁴ (78 145 079 205) The principal activities during the period were to that of an aircraft leasing company.	Qantas Climate Fund Investment 1 Pty Ltd¹⁴ (88 678 823 124) The principal activities during the period were to invest into the Silva Carbon Origination Fund (SCOF) managed by Silva Capital Pty Ltd.
National Jet Systems Pty Ltd¹³ (11 008 279 203) The principal activities during the period were to provide passenger air transportation services.	Qantas Group Flight Training (Australia) Pty Limited¹³ (45 128 258 677) The principal activities during the period were to provide flight training services.	QF ECA A380 2010 No.3 Pty Limited¹⁴ (61 145 079 134) The principal activities during the period were to that of an aircraft leasing company.	Qantas SAFFA Pty Limited¹⁴ (674 117 349) The principal activities during the period were to invest into the Sustainable Aviation Fuel Financing Alliance fund established by Airbus.
Network Aviation Holdings Pty Ltd¹³ (081 505 008) The principal activities during the period were that of a non-operative holding company.	Qantas Group Flight Training Pty Limited¹³ (29 128 258 104) The principal activities during the period were to provide flight training services.	QF ECA A380 2010 No.4 Pty Limited¹⁴ (42 145 079 054) The principal activities during the period were to that of an aircraft leasing company.	

13 These entities are reporting entities for the purposes of the Australian Modern Slavery Act.

14 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.