QANTAS GROUP

Modern Slavery and Human Trafficking Statement 2025

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 2*015 (**UK MSA**), 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 risks[1] in our operations and supply chains during the year ended 30 June 2025 (**FY25 or the reporting period**).

Qantas Airways Limited (**Qantas**) is an Australian public company (ABN 16009661901), registered at 10 Bourke Rd, Mascot, NSW, Australia. For the purposes of the MSA, 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 covered by this Statement, as well as other controlled entities that do not meet the threshold, have been included for transparency in Appendix 6. Additional information about the Group's TripADeal business, which includes three reporting entities that carry out business activities distinct from the wider Qantas Group is set out in Appendix 2. For the purposes of the Canadian Supply Chains Act, this Statement is made on behalf of Qantas, as the only entity of the Qantas Group that meets the reporting threshold.

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 2025.

Prior to Board approval, this Statement was reviewed by the Group General Counsel, the Chief Corporate Affairs and Communications Officer, and the 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 or controlled entities is set out in section 6.

This Statement was approved by the Qantas Board on behalf of all reporting entities (acting as the principal governing body under section 14(2)(d) (ii) of the MSA and as the sole reporting entity under section 11(4)(a) of the Supply Chains Act) on 5 December 2025 and is signed by the CEO as a Director and member of the Qantas Board, as required by the MSA, UK MSA, and Supply Chains Act.

1 In this Statement, a reference to 'modern slavery' refers to the eight types of serious exploitation as defined in the 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 Uluṟu-Kata Tjuṯa National Park, the lands of the Aṉangu Traditional Owners.

Photo credit: James D. Morgan via Getty Images

CEO's message



For more than 100 years, Qantas has safely connected people and places.

With this legacy comes significant responsibility, and respecting human rights — including our commitment to combat modern slavery — is core to our values.

As a global carrier, we recognise that our operations and extended supply chains both here in Australia and overseas, intersect with industries and geographies where risks to people may be elevated.

In FY25, we took steps to advance our approach to modern slavery risk management, which included identifying and responding to potential indicators of modern slavery through our ongoing due diligence activities. While we identified and worked to address each instance, none amounted to findings of modern slavery. The Board participated in strategic briefings on modern slavery and human rights, and we established oversight of our modern slavery program via our People Management Board, helping to enhance our governance. Our teams conducted visits at supplier sites both overseas and in Australia, allowing us deeper insight and opportunity for engagement on the ground. We also continued to work closely with a direct supplier to investigate practices at a tier two site in Thailand, leading to a commitment by the tier two supplier to remediate recruitment fees paid by migrant workers.

We have continued our efforts to enhance the accessibility of our reporting channels, making our externally managed Whistleblower reporting channel available in 12 languages used in key locations across our supply chain. To further encourage a culture of transparency and safety, we launched a 'Speak Up' campaign, empowering our people to report concerns confidentially, including those related to human rights. To support our frontline teams, we developed tailored guidance to help cabin crew identify and respond to indicators of human trafficking onboard.

We acknowledge that challenges remain, particularly in addressing risks within complex, multi-tiered supply chains, and we know that we need to continually improve our approach to modern slavery risk management to help drive positive impacts on the ground.

Looking ahead, we are committed to further building internal capability, embedding our due diligence framework, and integrating lessons learned into our business practices. We will continue to collaborate with our suppliers to address modern slavery and engage with industry and government to continue to advance our approach.

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 FY25. I am pleased to sign and present this Statement, which was approved by the Qantas Board on 5 December 2025.

Vanessa Hudson

Vanessa Hudson
CEO and Managing Director
Qantas Group, 5 December 2025

I have the authority to bind Qantas Airways Limited

Key areas of action

During FY25, we progressed key actions to enhance our modern slavery response.

Enhanced governance and oversight of our modern slavery program through Board and Group Leadership Team level briefings

Strengthened employee and supplier capabilities through training, site visits, and resources

Commenced integration of our TripADeal business into our Group wide modern slavery risk management processes

Worked with a tier two supplier on their approach to remediating recruitment fees paid by migrant workers

Undertaking steps to improve the accessibility of our grievance mechanisms by increasing the availability of our externally managed Whistleblower program in key languages and launching a 'Speak Up' awareness-raising campaign

Key areas of action in previous reporting periods to enhance our modern slavery response

FY21[2]

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

FY24

Implemented and refined a due diligence questionnaire for business partners

Jointly established the Modern Slavery Aviation Forum

Developed a modern slavery indicator assessment tool for supplier visits

Reviewed the effectiveness of our grievance mechanisms

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 FY24 Statement, which are set out in the table below. In addition to implementing these strategic initiatives, we also progressed a range of other initiatives, including: continuing our focus on training for our people; developing additional guidance for cabin crew about identifying and responding to human trafficking; and continuing to collaborate with our peers in the aviation sector.

Initiatives	We said we would	Our progress in FY25
Risk assessment and due diligence	✓ Further enhance our governance structure by identifying an appropriate forum to provide governance and oversight of our modern slavery response outside of the Supply Chain Assurance (**SCA**) process.	We established senior management oversight of our work on modern slavery and human rights more broadly to the People Management Board (**PMB**). The Board includes all members of the Group Leadership Team and key senior executives within the Group People function.
	✓ Deliver a strategic briefing to our Board on modern slavery and broader human rights risk management.	We delivered a tailored strategic briefing to our Board about modern slavery and broader human rights issues and a further briefing as part of the Modern Slavery Statement approval process.
	✓ Continue 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.	We continued to prioritise engagement with selected tier one and tier two suppliers. We visited three offshore catering facilities in Singapore, the UK, and Italy, as well as seven tier two factories in China, one tier two factory in Thailand, and two Australian facilities. Where relevant, team members applied our modern slavery indicator tool during these site visits. We also continued to engage with suppliers in regional Australia on matters identified through our due diligence process and concerns raised by two workers at separate supplier sites.
	✓ Implement a framework to formalise our due diligence approach for our key commercial (non-supplier) relationships.	We continued to embed the due diligence approach developed in FY24 for non-supplier third-party relationships into BAU activities throughout FY25. This included formalising the framework for due diligence of third parties outside the SCA program, including clear articulation of internal roles and responsibilities, and establishing criteria for when to undertake targeted engagement with partners based on areas of elevated risk.
Grievance mechanisms and remediation	→ Progress work to implement key recommendations from the FY24 review of the effectiveness of our grievance mechanisms.	In FY25, the Group launched a 'Speak Up' campaign to encourage safe and transparent reporting by promoting the availability of channels and ways our people can report all relevant concerns, including modern slavery. We expanded the language offering of our externally managed Whistleblower program to 12 languages (other than English), which are the most common languages used in Qantas' key supply chain locations. We also explored options for alternate reporting channels to further strengthen the accessibility of reporting pathways for modern slavery and other concerns. We will continue to explore options for alternate reporting channels in FY26.
	→ Develop a supplier engagement strategy to raise awareness and improve accessibility of our Whistleblower reporting channels for our suppliers and their workers.	While we will continue supplier awareness raising efforts as part of our business-as-usual supplier engagement, our focus is to first strengthen and improve the effectiveness of our grievance mechanism. Going forward, this initiative will be included as part of our broader work to implement the recommendations from the effectiveness review.

✓ Complete → Partially Complete — Continue in FY26

Looking ahead to FY26 and beyond

In recent years, we have progressively strengthened our approach to managing modern slavery risks, building on each reporting period to refine our tools, deepen engagement, and enhance visibility across our operations and supply chain. As we look ahead to FY26 and beyond, our focus is shifting from development to consolidation, embedding human rights considerations into core business processes, and aiming to ensure a strong, sustainable foundation for long-term impact. This includes:

- Continuing to build internal capability aimed at deepening understanding of human rights risk, particularly modern slavery, across teams involved in supplier engagement;
- Collaborating with the newly established Responsible Procurement team to understand potential avenues to embed human rights considerations into key procurement processes;
- Exploring opportunities with the Sustainable Aviation Fuel (**SAF**) Investment team to enhance investment due diligence processes, supporting materials, and training;
- Ongoing work to improve the accessibility and effectiveness of our grievance mechanisms; and
- Embedding due diligence and risk assessment systems and processes for the TripADeal supplier base.

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 operate 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

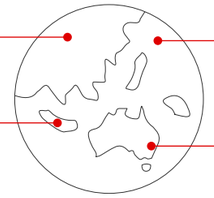
The table below provides more information about our key operations and businesses.

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 353 aircraft.	Qantas, jetconnect, Jetstar, Network Aviation, QantasLink, National Jet Systems (A Qantas Group Airline)
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). More information about Qantas Loyalty is included on page 8. 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. TripADeal[3] is a wholly-owned subsidiary. It is an online travel business offering package holidays. TripADeal previously reported separately under the MSA, however, following the acquisition, it is now included in the annual Qantas Group Statement in Appendix 2. 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 Taylor Fry is included in Appendix 3.	Qantas Loyalty, Frequent Flyer, Qantas Hotels, Qantas Insurance, Qantas Money, Business Money, Business Rewards, Vii, TripADeal, Taylor Fry
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 FY25, Qantas Freight served over 960 customers and carried approximately 300 million kilograms of freight.	Qantas Freight, Qantas Courier, Express Freighters Australia, Australian airExpress, JETS Transport Express
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 United States of America (**USA**), and the UK.	Qantas, Jetstar, QantasLink

3 On 28 June 2024 Qantas purchased the remaining 49 per cent of TripADeal. It is now wholly owned by the Qantas Group.

Understanding our operations



More than 30,000 employees across 27 countries

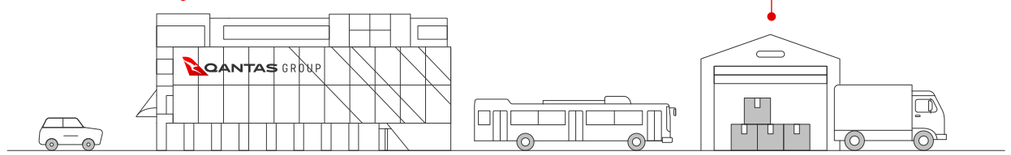
Airline hubs (including commercial offices) in Australia, New Zealand, Singapore, the UK, and the USA

Operated flights across 112 domestic and international destinations

Headquartered in Sydney, Australia

17% of our Australian employees hold operational support roles such as meteorology, flight planning services and corporate services such as legal, finance, and human resources

~280,500 unique retail customers and ~670,000 orders

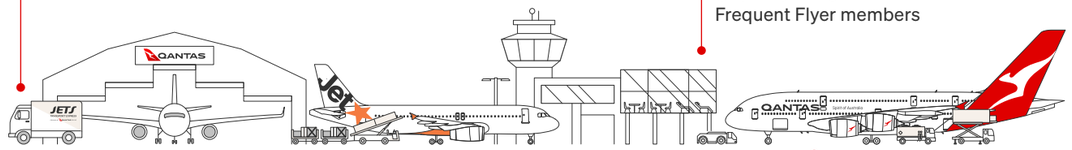


83% of our Australian employees hold operational roles such as pilot, cabin crew, and engineering and maintenance



Approximately 960 major freight customers, with ~300 million kgs of freight carried

Over 17.6 million Frequent Flyer members



91% of our International employees are in operational roles with the remaining 9% providing operational support

55 million+ customers carried on 353 Group aircraft

In FY25



Qantas domestic passenger flights

223,821



Qantas flights to or from Australia

42,999



Dedicated freight flights

12,695



Jetstar domestic passenger flights, inclusive of NZ domestic flights

103,544



Jetstar flights to or from Australia

25,694



Jetstar Asia passenger flights

17,829[4]

In FY25 we also:

- Launched a new domestic route servicing Perth and Busselton;[5]
- Expanded into five new international routes, including Brisbane to Palau, Vanuatu, and Manila, Sydney to Paris through Perth, and Darwin to Singapore; and
- Received 17 new aircraft deliveries and 12 mid-life aircraft deliveries, while exiting 17 aircraft.

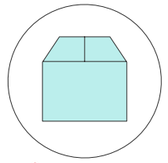
4 In June 2025, Qantas announced the closure of Jetstar Asia from 31 July 2025. Jetstar Asia information for FY25 has been included in this Report where specified.

5 This route has been suspended as of 5 October 2025.

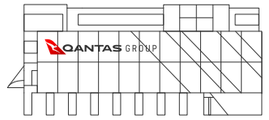
Understanding our global supply chain



$15.8 billion total supplier spend (up from $14.8 billion in FY24)



5,842 suppliers[6] (up from 5,778 in FY24)

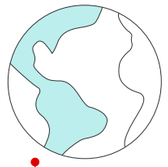


Our centralised procurement teams undertake the majority of our procurement

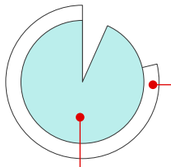
Post onboarding, the business unit that engaged the supplier is responsible for supplier monitoring and oversight



60% of total spend in Australia



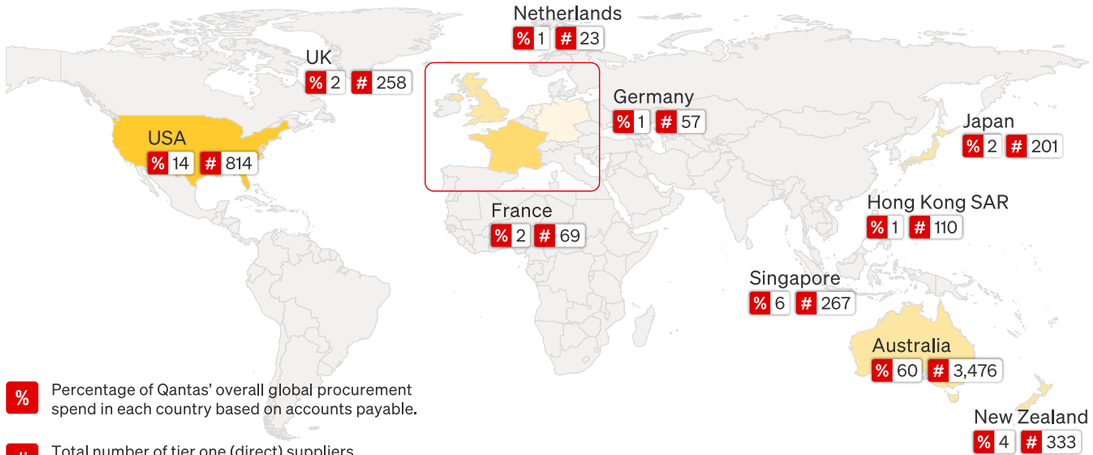
<1% of total spend in Canada, with 90% of spend in Canada occurring across the categories of Aircraft Equipment and Maintenance and ICT



79% of total spend with our top 100 suppliers

96% of spend with our top 500 suppliers

Our geographic spend: Top 10 countries



% Percentage of Qantas' overall global procurement spend in each country based on accounts payable.

\# Total number of tier one (direct) suppliers engaged by Qantas in each country of spend.

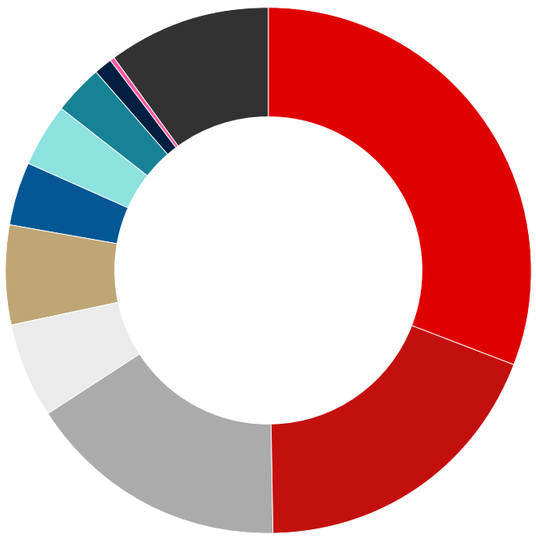
Data for each country is based on the address for the supplier in our accounts payable system. The supplier may also operate in and source from other countries.

Represents the estimated prevalence of modern slavery by country according to the Walk Free Global Slavery Index (noting estimated prevalence per 1,000 population for the 10 countries with the highest prevalence).

6 Supplier numbers are based on records in our accounts payable system as of 31 July 2025 (the date the data was sourced).

What we source

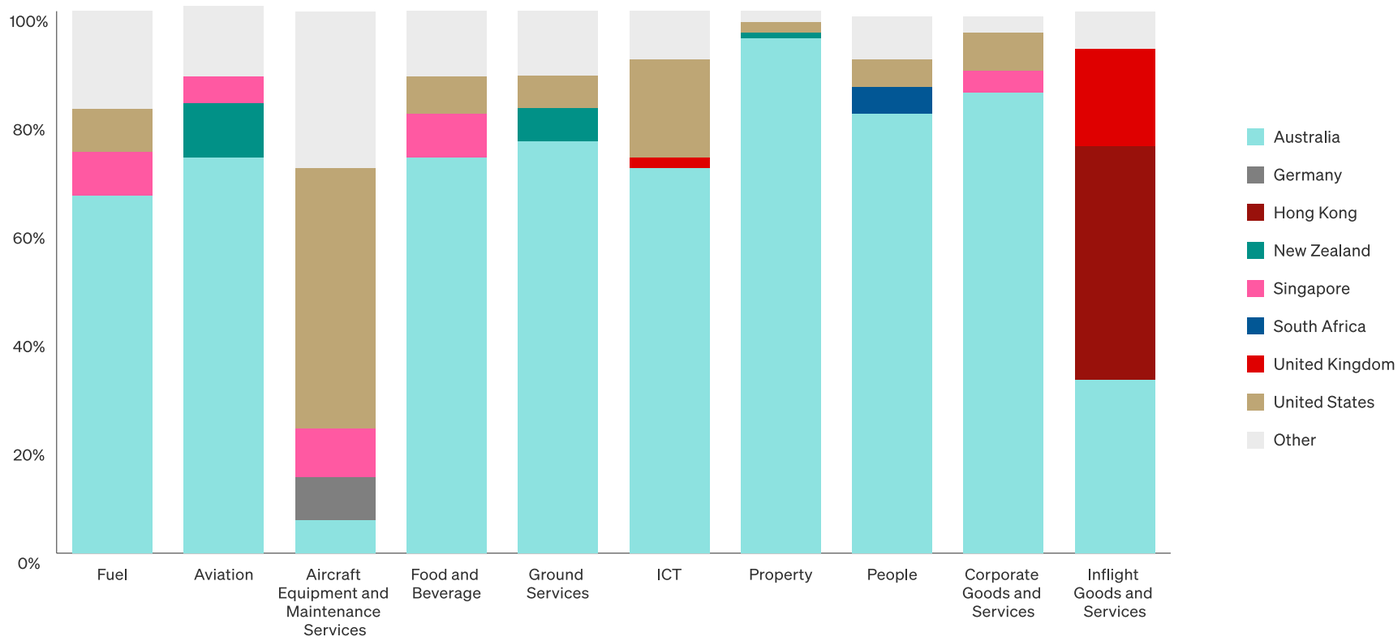
This pie chart explains our procurement sourcing footprint over FY25, including identifying the key categories of our spend and the types of goods and services that fall under each category.[7]



Category	Share of spend	Summary of category
Fuel	31%	The Fuel category covers all air and ground-based fuel used to service transportation needs, domestically and internationally.
Aviation	19%	The Aviation category includes aviation charges incurred by airlines for their operations, including overflight and route navigation charges.
Aircraft Equipment and Maintenance Services	16%	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	6%	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.
Property	4%	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.
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.
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 rotable items such as glassware, teapots, cutlery, and containers.
Other	10%	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 top sourcing countries by category[8] (%)

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.



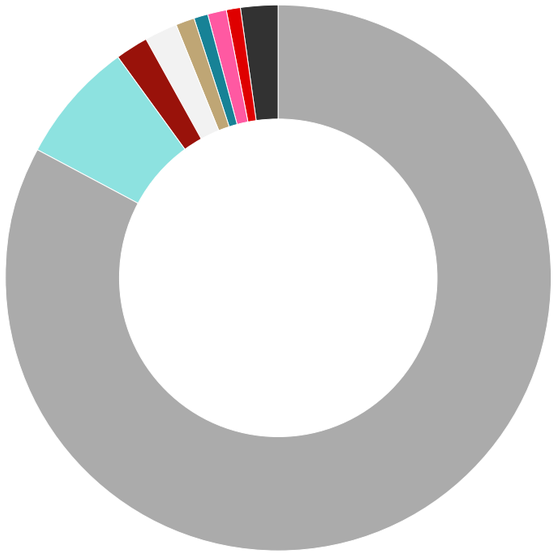
7 Percentages have been rounded and may not add to 100%. Spend for Taylor Fry and TripADeal are excluded.

8 Country location is based on the supplier address located in our Accounts Payable system.

Section 3: Our modern slavery risks

Our sourcing footprint in Canada

Analysis of our accounts payable system data has identified that during FY25, the Group transacted with less than 100 suppliers with a country location nominated as Canada. Further analysis identifies that in the same period, the total spend with these suppliers was less than one per cent of our total procurement spend, with 90 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. This information has been included to support our reporting requirements under the Canadian Supply Chains Act.



Category	Share of spend
Aircraft Equipment and Maintenance Services	83%
ICT	7%
Aviation	2%
Food and Beverage	2%
Ground Services	1%
Fuel	1%
Travel and Accommodation	1%
People	1%
Fleet Lifecycle	<1%
Financial Services	<1%
Corporate Goods and Services	<1%
Property	<1%
Other[9]	<1%

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 over 200 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; France, Scotland, Italy, New Zealand, US, Spain, Japan, Mexico, China, Portugal, Ireland, Argentina, Greece, Sweden, Poland, Singapore, England, Denmark, and Venezuela.

Qantas Marketplace has approximately 205 suppliers, also predominantly in Australia, with 23 based in NZ (location information is based on the legal entity with which we contract, not origin of product). All of our white label partners are Australian companies or Australian branches of global companies.

Qantas Loyalty also contracts with 126 IT service providers, the majority of these are located in Australia (62), the USA (39), and the UK (5). The remainder are predominantly located across Europe. Our customer contact centre services are provided through a third-party service provider headquartered in Australia. Although this service provider is an Australian entity with a small onshore call centre in Australia (Gosford, NSW), the majority of its contact centres are in the Philippines (Manila and Duma).

9 Other includes: Marketing and Promotions and Banking and miscellaneous spend.

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 operations or supply chain activities that have increased the risks of modern slavery over FY25. However, we expect the closure of Jetstar Asia in the next reporting period (from July 2025) is likely to result in a modest reduction of sourcing of goods and services from suppliers domiciled in, and whose extended supply chains include, regions associated with a higher prevalence of modern slavery risk. We continue to implement and monitor a range of controls to manage modern slavery risks, as outlined in this Statement.

When assessing modern slavery risks, we are informed by the United Nations Guiding Principles on Business and Human Rights (**UNGPs**) and consider both the potential '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 9 are areas where our expenditure is comparatively low, the risk to people may be comparatively higher than other areas of our supply chain.

Drawing on the UNGPs, the box below outlines how businesses might cause, contribute to, or be directly linked to modern slavery, and provides hypothetical examples relevant to the aviation sector to illustrate the potential risk of 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 imposes unrealistic cost or delivery pressures on a supplier providing inflight products, knowing this could lead to the exploitation of workers to meet those demands.

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 catering supplies or crew uniforms are sourced from suppliers whose subcontractors use forced or child labour in the production of raw materials or manufacturing processes.

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

How we identify potential risks of modern slavery in our operations and supply chains

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

We work to proactively identify potential modern slavery and broader human rights risks across our global operations and supply chains by, for example, 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 the right, we outline the categories of products and services that we procure, where our ongoing risk assessment activity has identified the potential risk of modern slavery in our supply chains may be more prevalent.



10 Supplier count is reported at the parent entity level. Supplier count is based on the number of distinct parent entities, with subsidiaries grouped under their ultimate controlling company.

Potential risks of modern slavery in our operations and supply chains

We consider our direct workforce to involve a negligible risk of modern slavery based on our established human resources processes and controls. Our employees are directly engaged under contracts or Enterprise Agreements (**EA**) 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 and support the rights of our employees to freedom of association. There are more than 50 collective agreements covering approximately 20,000 employees across the world, and the Group has established channels for engaging with respective unions.

As an airline, we 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 people experiencing modern slavery either internationally or within countries. We also recognise that airline services may be misused by offenders for illicit purposes, including labour trafficking involving debt bondage or travel for the sexual exploitation of persons in travel and tourism. These risks may affect both adults and children, who are particularly vulnerable during transport. In recognition of this, we have worked collaboratively with Commonwealth government agencies and the Australian Childhood Foundation through FY25 to assess the Group's broader child safety measures (see page 10). We expect to continue to work collaboratively with relevant authorities and agencies in efforts to combat these issues and strengthen safeguards.

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 in FY25 may include[11]	Modern slavery risk factors	Common forms of modern slavery (hypothetical examples)
Fuel	Conventional and Sustainable Aviation Fuel (**SAF**)	31%	Australia, Singapore, USA	**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, USA, South Africa	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 (including packaging): amenity kits, sleeper suits, blankets, pillows, headsets	<1%	Hong Kong (SAR), Australia, UK	China, Thailand, India		Inflight goods and / or their packaging could be manufactured by workers who have been charged recruitment fees which are used to keep them in a situation of debt bondage.

KEY

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

11 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.

Assessing specific risk areas: Child safety risks

In addition to our overarching work to assess modern slavery risk areas, we may also take steps to assess particular risk areas in detail. For example, during the reporting period, Qantas engaged with the Australian Department of Foreign Affairs and Trade (**DFAT**) and the Australian Childhood Foundation (**ACF**) to explore opportunities to strengthen Qantas' approach to child safeguarding. This work focused particularly on aspects of Qantas' operations associated with DFAT funded activities and routes. As part of this engagement, DFAT engaged the ACF to partner with Qantas to undertake a Child Safeguarding Risk Assessment. The process included consideration of Qantas' modern slavery and broader human rights commitments and involved undertaking a document analysis, policy review, and a facilitated discussion with representatives across Qantas.

While focused on child safety more broadly, the risk assessment is relevant to our work to manage modern slavery risks, as there is a risk that aviation services around the world could be used to traffic children for exploitive purposes. While we have not identified specific concerns relating to this issue in the Qantas context, where relevant we will consider additional risk management steps as part of our ongoing work around child safety.

Understanding our geographic exposure to modern slavery risks at tier two and below

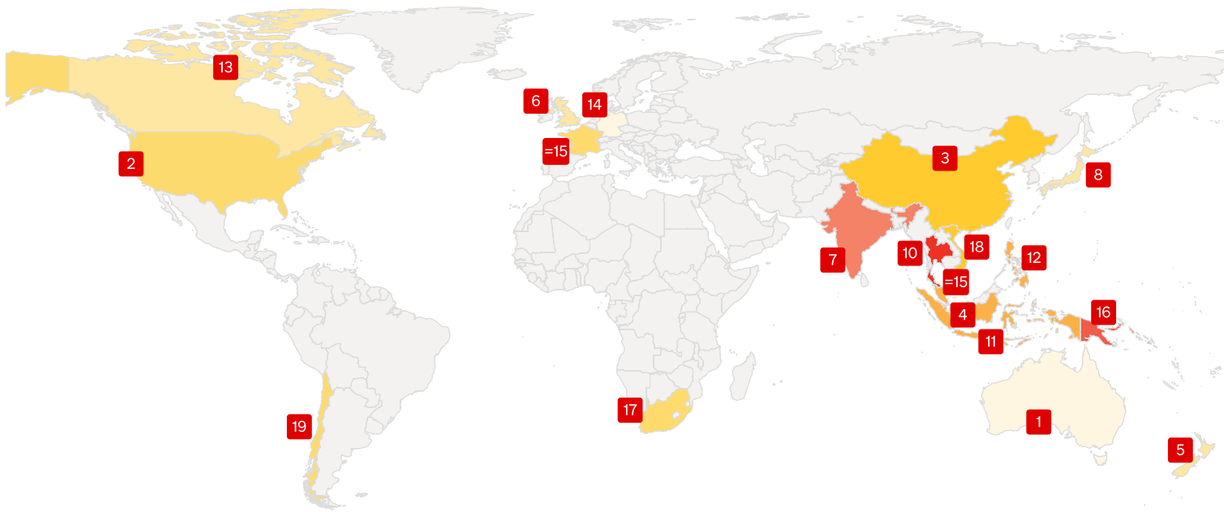
As outlined on page 6, our tier one suppliers are located in a range of countries around the world. In some cases, these suppliers also source goods and services from third countries to support their operations and the delivery of goods and services to Qantas. Understanding where our suppliers source from supports us to understand the potential risk of modern slavery connected with the product or service being procured, and helps inform 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, 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 countries our suppliers may source from and produce the below map.[12] In FY25, there has been minimal change to the proportional indicative sourcing footprint of our suppliers compared with FY24. Australia remains the primary sourcing location, followed by the US, China, Singapore, and New Zealand. We have observed increased indicative sourcing volumes from countries such as the UK and India. While the overall indicative volume of suppliers at tier two and below has increased across all countries in FY25, country, this has not resulted in a material shift in the geographic distribution of sourcing activity. The map provides an illustrative example of how the geographical footprint of our supply chain expands at tier two level and below.

Our suppliers' sourcing footprint — indicative overview

Rank	Change*	Country	%
1	•	Australia	41
2	•	United States	8
3	•	China	5
4	•	Singapore	4
5	•	New Zealand	4
6	▲	United Kingdom	4
7	▲	India	3
8	▼	Japan	3
9	▼	Hong Kong	2
10	•	Thailand	2
11	•	Indonesia	1
12	•	Philippines	1
13	•	Canada	1
14	▼	Germany	1
=15	•	France	1
=15	▲	Malaysia	1
16	▼	Papua New Guinea	1
17	▼	South Africa	<1
18	▼	Vietnam	<1
19	▲	Chile	<1
		All others (101)	13



Low — High

Represents the estimated prevalence of modern slavery by country according to the Walk Free Global Slavery Index.
*Indicates the change in rank compared to end FY24.

12 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.

Indicative examples of supply chains beyond tier one

As outlined on page 10, our analysis helps us to understand the geographic footprint of our supply chains below tier one. 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.[13]

Inflight packaging

Qantas engages a tier one supplier to design and develop packaging materials for inflight products, such as meals.

Potential Risk: If inappropriate timeframes and cost requirements were set by Qantas and our supplier at design stage, this could lead to increased modern slavery risks in the supply chain, such as if these requirements resulted in increased pressure on workers.

Paper pulp and other materials (such as sugar cane) is sourced for use in packaging for inflight food products and other goods.

Potential Risk: Raw materials could be grown and harvested by exploited workers in jurisdictions where labour rights protections for workers may be comparatively limited or not effectively enforced.

Packaging is manufactured at a tier two supplier site, in accordance with Qantas specifications.

Potential Risk: Migrant workers engaged by the tier two supplier may have been charged recruitment fees by third-party labour agencies, putting them at risk of debt bondage.

Packaging is shipped to Qantas hubs for use on relevant flights.

Potential Risk: Workers involved in transportation and warehousing could be exploited, including in higher risk contexts such as on ships and in warehouses where it can be more difficult to monitor working conditions.

Once used in flight, packaging is collected for responsible disposal. Compostable packaging is typically sent to industrial composting facilities.

Potential Risk: Third-party service providers used by these facilities such as cleaners or security could be provided using exploited workers.

Inflight catering

Fresh produce and other ingredients for use in catering are sourced from primary producers and manufacturers.

Potential Risk: Horticulture workers involved in growing and harvesting fresh produce in Australia and overseas could be exploited through debt bondage or forced labour.

Packaging for inflight meals is sourced from specialised manufacturers, including hot boxes for cooked meals.

Potential Risk: Workers involved in manufacturing packaging and sourcing the materials used in this process could be subject to exploitation (see adjacent packaging example).

Fresh produce and other ingredients are processed at central catering facilities and packaged into inflight meals.

Potential Risk: Sub-contracted workers engaged by the caterer to meet increased demand during peak times could be subjected to exploitation by third-party labour hire agencies.

Inflight meals are delivered to relevant airports and loaded onto aircraft.

Potential Risk: Third-party logistics workers could be exploited by transport providers, including where workers may be migrant workers who may be required to work extended shifts and are not paid appropriately.

Meals are consumed in flight with waste collected for disposal.

Potential Risk: Lower-skilled workers at waste disposal and recycling centres may be vulnerable to exploitation in some circumstances, including where they are located in higher risk geographies.

Sustainable Aviation Fuel (SAF)

Feedstock grown or produced (common feedstock types include canola oil, energy crops, and waste materials).

Potential Risk: Workers involved in growing and harvesting agricultural products used in feedstock could be exploited in Australia and overseas. Temporary migrant workers may be especially vulnerable, including during peak times such as harvest.

Feedstock transported to refinery.

Potential Risk: Workers used by third-party transport providers could be exploited by the provider, including where transport occurs in higher risk geographies for modern slavery and in rural or remote areas where it may be difficult to monitor working conditions.

Feedstock processed and refined into SAF and blended with conventional aviation fuel.

Potential Risk: Third-party service providers at SAF facilities such as cleaners or security could be provided using exploited workers.

Blended fuel delivered to airport holding tanks and then to aircraft.

Potential Risk: Subcontracted workers for third-party transport providers could be exploited by the contractor, with this risk potentially elevated in higher risk geographies (which could include airports overseas).

13 This visual, including the risks described, is intended as an indicative example only and is not representative of the end to end supply chain, or the people and processes involved.

Section 4: How we manage our modern slavery risks

Our approach to human rights and modern slavery

Qantas aims to respect all internationally recognised human rights. Sustainability is one of the seven strategic priorities of the Qantas Group strategy and is integral to long-term value. Our Sustainability Framework provides an overall, broader view of sustainability across the Group. It is structured around three core principles: Valuing our planet, Enabling our people, and Connecting customers and communities. Respect for human rights is part of this Framework.

As part of our strategic approach and commitment to human rights, we work to identify and address any involvement we may have in actual and potential human rights impacts across our operations and supply chain through the actions we describe in this section.

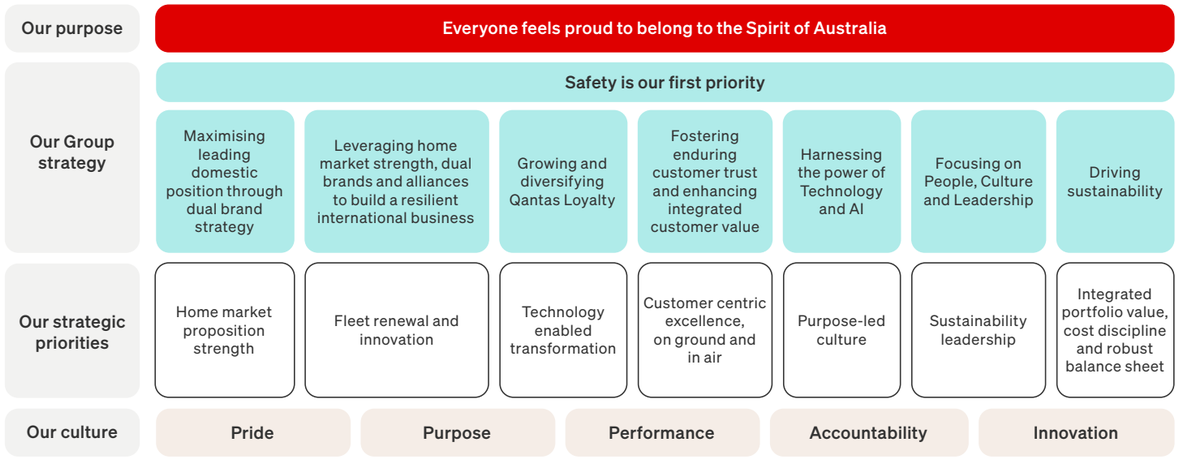
Governance and management

Our governance framework underpins our response to modern slavery and broader human rights risks, including by providing a clear structure for accountability.

The Qantas Board of Directors (the Board) is responsible for overseeing the Group's corporate governance framework. Throughout FY25 it was assisted by four Board committees:

- **Safety, Health, Environment, and Security Committee (CHESS):** responsibilities include oversight of the Qantas Group's operational risks (safety, health, environment, security and business resilience);
- **Audit Committee:** responsibilities include oversight of the Group's enterprise-wide risk management, which includes sustainability risks as well as legal and regulatory compliance (other than those which fall under CHESS);
- **People and Remuneration Committee:** responsibilities include oversight of Executive Management performance (including delivery against sustainability performance targets within the remuneration framework), consideration of sustainability metrics in incentive plans, and oversight of inclusion and diversity;
- **Nominations Committee:** responsibilities include ensuring that the Board collectively have the appropriate mix of skills and experience to provide effective oversight (including the competencies required to support evolving skill needs), and ensuring that the Board's induction and ongoing education program is effective.

The Qantas Group strategy



Our Sustainability Framework



Engagement with the Board on modern slavery and broader human rights issues

Active engagement with the Board contributes to strengthening accountability and governance within our modern slavery risk management approach. In early FY25, we partnered with Pillar Two, a specialist business and human rights advisory firm, to deliver a strategic briefing to our Board about modern slavery and broader human rights issues. The briefing was co-delivered with our internal modern slavery subject matter expert (**SME**).

We worked closely with Pillar Two to tailor the briefing to our operating context. Key content included analysis of how human rights are relevant to Qantas and the strategic landscape, discussion of Qantas' salient human rights issues, and practical guidance for Directors about questions that they could consider as part of their work to oversee Qantas' actions to manage modern slavery and other human rights risks. Additionally, the Board also received a tailored briefing as part of the Modern Slavery Statement approval process.

These briefings complemented our existing business-as-usual processes for engaging the Board on business and human rights issues, including modern slavery. For example, this includes bi-annual submissions to the Board's Audit Committee, which oversees a range of risks and receives updates on the SCA program, including modern slavery risk in our supply chain. Additionally, the Board receives an annual update on the Group Policy Framework, which incorporates an overview of key global human rights legislative developments and emerging themes, along with program developments and actions taken during the year. The Board also approves relevant Group policies, providing opportunities for discussion and engagement.

We will continue to consider future opportunities for further engagement with Board members around modern slavery and other human rights issues as appropriate.

Management's responsibilities

Our enterprise-wide risk framework provides the structure for identifying and managing risks and guides our approach to managing modern slavery risks. The Business Integrity and Compliance (**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 Company Secretary, 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.

During the reporting period, as part of our efforts to enhance visibility and governance of our modern slavery response, we established senior management oversight of our work in this area and on broader human rights issues through the People Management Board (**PMB**). The PMB includes all members of the Group Leadership Team and key senior executives within the People function, and and was established in 2023 to provide strategic direction on people-related matters across the Group. As part of this enhanced governance, the BIC function delivered an initial briefing to PMB members outlining Qantas' approach to modern slavery in May 2025. The session covered key concepts related to the UNGPs, such as remediation, understanding risk to people, and the different levels of involvement businesses may have in human rights harm, whether by causing, contributing to, or being directly linked to it. The briefing also explained Qantas' continuous improvement approach and how our modern slavery response has evolved over time. The session concluded with discussion of Qantas' current priorities and future plans. Going forward, the PMB will continue to oversee Qantas' modern slavery work in this area.

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.

People Management Board

Responsible for strategic oversight and leadership of people, strategy and culture, including overseeing people programs, utilising metrics to inform decision making, and ensuring effective governance of human rights matters including our modern slavery response.

Supply Chain Assurance Leadership Council

Responsible for oversight of the effective management of the Supply Chain Assurance program, including modern slavery risk management for 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 SMEs in the areas of Corruption, Modern Slavery, Environment, Privacy, Sanctions, Cyber Security, and Work Health and Safety.

Business Integrity and Compliance

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

Business Units

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

Our Policy framework

As part of our governance approach, we have implemented policies, standards and contractual provisions to support our broader human rights commitments and modern slavery response. The clear articulation of obligations and standards expected from our people, our suppliers, and our business partners, are key controls to manage the risk of modern slavery in our operations and supply chain.

For suppliers, we seek to mandate compliance with our Supplier Requirements and Group Compliance Statement, which include human rights and modern slavery provisions, in relevant contractual arrangements. Where it is not possible to include these requirements, we assess the risks and aim to implement alternative provisions that are tailored to the nature and risk profile of the relationship. For goods and services procured under a purchase order, our standard terms and conditions require compliance with the Group Compliance Statement.

For third parties which may not constitute a customer/supplier relationship, our contracts typically include our Group Compliance Statement, which includes specific clauses on modern slavery. Where of an equivalent standard, the parties may agree to mutually recognise each respective Code of Conduct. Otherwise, we endeavour to have the third party acknowledge our Supplier Code of Conduct.

More information about the policies shown in the diagram on the right and how we implement them is set out in Appendix 4.

We are committed to continually improving and refining our policies to ensure they remain fit for purpose. During FY25 we continued to strengthen our Policy framework by:

- revising our Supplier Code of Conduct to reinforce our commitment to ethical and responsible business practices. In alignment with our positive duty to eliminate workplace sexual misconduct, suppliers are now required to provide training to their workers on safe, respectful, and inclusive workplace behaviours. To support fair working conditions, suppliers must also ensure that working hours are not excessive, with overtime being voluntary and reasonable.
- refreshing our Procurement Policy with an objective to reinforce governance and compliance requirements and support responsible sourcing activities. A key feature of the policy is the SCA risk management program, which provides a structured framework to assess supplier practices and mitigate risks, including those related to modern slavery. As part of this update, SCA guidance and procedural materials were refreshed with the aim of improving compliance and ease of application across the business.



*Where included in relevant contractual arrangements

Establishment of Responsible Procurement team

In FY25, we established a dedicated Responsible Procurement team focused on both improving internal processes and working with suppliers to enable and support the Group's commitments to Sustainability, First Nations procurement, and Access and Inclusion. We are considering how our human rights SMEs could collaborate with the responsible sourcing and procurement teams, including through capability building, to strengthen human rights considerations across procurement practices.

Our salient human rights issues

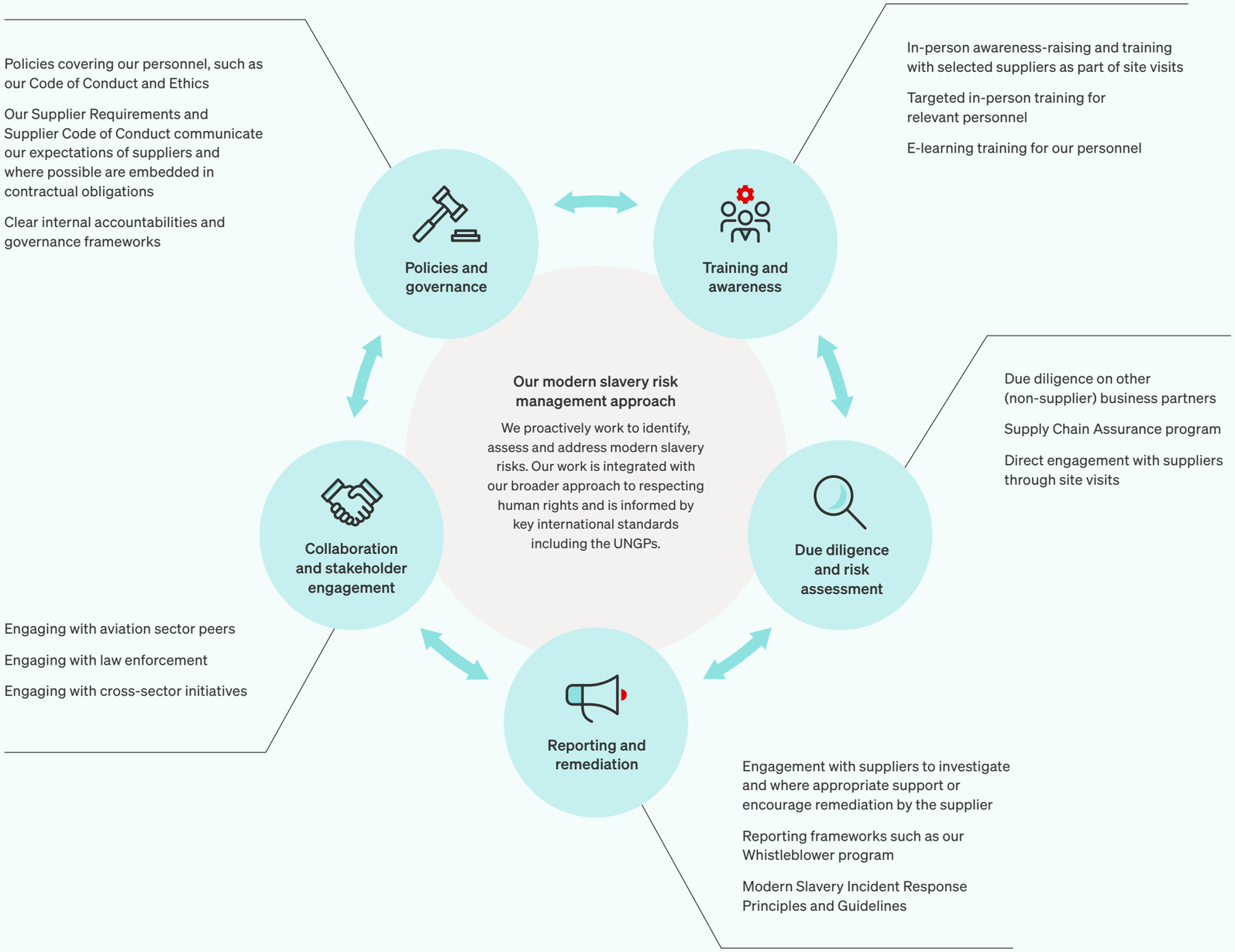
Qantas aims to respect internationally recognised human rights. As part of this commitment, we work to identify and address any involvement we may have in actual and potential human rights impacts across our operations and supply chains. Our salient human rights issues help us to understand the areas 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 across 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.

Our salient human rights issues

- **Respecting labour rights in our supply chains**
- **Safeguarding customer safety and welfare**
- **Securing customer and employee privacy**
- **Preserving a clean, healthy, and sustainable environment**
- **Providing safe, respectful, and inclusive working environments for our people**

Our approach

Our modern slavery response, which is part of our approach to human rights, is based on five key elements, as shown in the diagram below. 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.



Modern slavery training and awareness raising

Training and awareness-raising are core components of our approach to managing modern slavery risks. During FY25, 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 mandatory Safety and Security Awareness training, which includes 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.

Launch of online Human Rights Hub for staff

We launched a Business Integrity Hub, which includes content on Human Rights and is accessible via our intranet. The hub sets out practical information about the importance of respecting human rights, including through taking action on modern slavery. This includes information about Qantas' salient human rights issues, guidance about reporting concerns, case studies tailored to the aviation sector, a video about modern slavery, and a resource library. The hub is also connected to the internal procurement portal.

Training for offshore cabin crew base managers

Our BIC team delivered a human rights training session to offshore cabin crew base managers located in Thailand, Singapore, and Indonesia. The training included content on responsible recruitment in the cabin crew context, including Qantas's commitment to respect human rights and guidance about issues such as access to grievance mechanisms.

Tailored training for Jetstar

To better support the onboard management of potential human trafficking instances, BIC developed a four-point response protocol and supporting principles that have been incorporated into aircrew manuals (see page 21), and is readily accessible for aircrew to refer to in real time, as needed. To complement this, human trafficking training content was revised and implemented. Specifically, the updates include enhanced guidance on recognising and responding to potential human trafficking situations. This includes information on how the aviation sector may be used to facilitate human trafficking, key behavioural indicators to watch for, and reinforces the four-point response protocols on how to respond to and report suspected incidents.

Face-to-face training for aircrew

In FY25, 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 FY25, more than 9,500 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 FY24, we launched a new modern slavery e-learning module assigned as required learning for all employees. We developed this training internally to specifically tailor 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 practical scenario-based knowledge checks to reinforce learning. As of 30 June 2025, over 25,575 people across the Qantas Group had completed the training.

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 FY25 we delivered tailored training at a tier two factory, focussing on human rights, supplier expectations, and recruitment fees. The training incorporated case studies involving the same industry to help contextualise the issues and build practical understanding. The training was attended by the factory owners and key management as well as representatives from our tier one supplier (refer case study page 22).

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 is an internal process for assessing suppliers for potential risk across multiple areas including; modern slavery, anti-bribery and corruption, sanctions, illegal logging, privacy, workplace health and safety, and cyber security.

The SCA program aims to standardise 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.

In FY25, we took steps to strengthen the program including through expanded risk assessments, improved supplier reassessment processes, and upgraded resources. Some suppliers with elevated residual risks, including those related to modern slavery, were subject to reassessment during the reporting period. In some instances suppliers were able to provide evidence of improvement and risk ratings were adjusted from medium to low. Building on improvements made in FY24, we introduced further measures to support SCA compliance, including through improved reporting and proactive notifications to business users.

All SCA guidance and procedural materials were also refreshed to reflect these updates and improve usability. The program continues to apply to all suppliers managed through the centralised Group Finance system. Over time, the SCA program has achieved substantial coverage across our active supplier base. We also periodically reassess suppliers who have presented an elevated level of risk or experienced a material change in circumstance.

As outlined on page 10, the use of credible country risk data is a key component of our approach to identifying and managing modern slavery risks. During the reporting period, we refreshed the country risk data within both the Exiger platform and our SCA system. These updates help ensure our risk profiling remains current, data-driven, and responsive to global developments, supporting the integrity of our due diligence processes.

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 seek to ensure that, for procurement categories which we have assessed as being associated with a higher prevalence of potential modern slavery, where appropriate we look beyond tier one. For example, where a supplier may provide inflight products, such as amenity kits, headsets, sleeper suits or blankets, we may perform due diligence on the tier one supplier and the tier two (or below) manufacturer, which can include 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 19).

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 vast ecosystem of data feeds including public records, corporate registries, ownership data, watchlists and sanctions lists, and open web content, all of which inform our broader assessment. We also utilise and consider indices and data from reputable third-party providers such as the Walkfree Global Slavery Index, 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 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 due diligence questionnaire 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. Having regard to these challenges, we look for ways to tailor our approach and explore alternative avenues for engagement with suppliers as needed.

3 4 5 Mitigate / Remediate / Communicate

Informed by 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 stakeholders, including 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 standard contractual arrangements, Supplier Requirements and Supplier Code of Conduct 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. Our standard contractual clauses include provisions for the supplier 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 expect 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 19). 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.

Supply Chain Assurance and other third-party due diligence FY25

~1,760+[14]
Supplier assessments initiated through SCA program

~680+
Suppliers subject to preliminary risk assessment

93[15]
Suppliers and third parties progressed to advanced due diligence desktop review

4[16]
New suppliers assessed and monitored as medium risk

7[17]
Suppliers reassessed from medium to low risk

10[18]
Suppliers monitored at medium risk 30 June 25

14 This number represents the total number of unique suppliers initiated for assessment through the SCA program for all risk areas in FY25. This number is reduced from previous years as the Unassessed Supplier Program concluded prior to the reporting period.

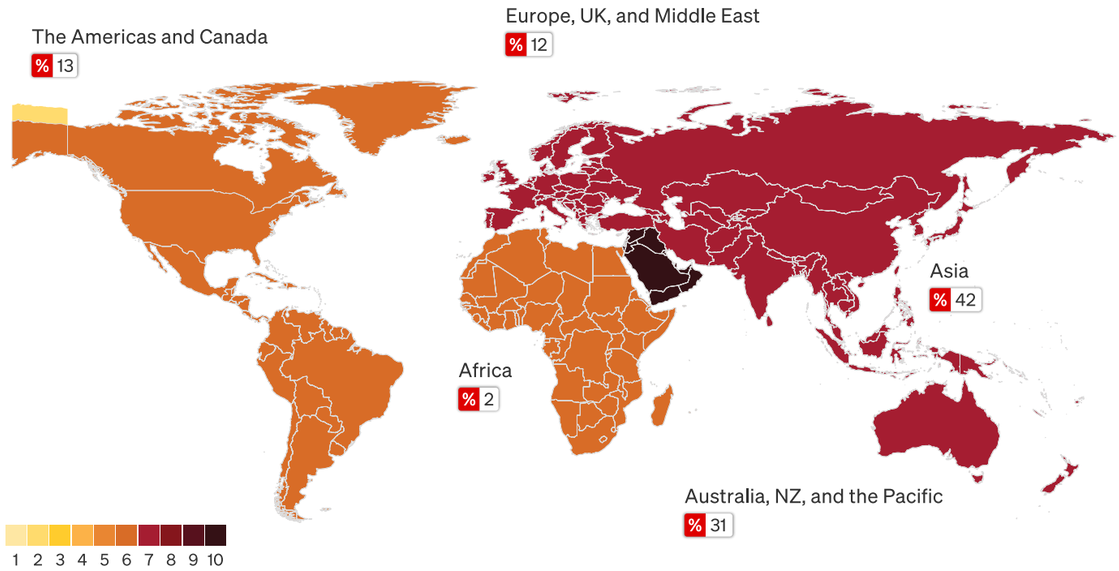
15 This number includes both suppliers subject to due diligence through the SCA program and other third parties subject to the business partner due diligence questionnaire we developed in FY24.

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

17 This number includes suppliers that were assessed as medium risk 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.

18 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.

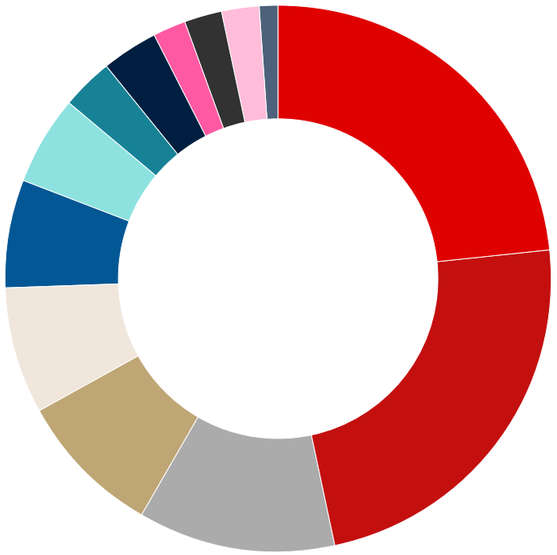
Advanced due diligence by region[19]



Represents the estimated prevalence of modern slavery by region according to the Walk Free Global Slavery Index (noting estimated prevalence per 1,000 population).

% Percentage of advanced due diligence assessments conducted for sites in each region.

Advanced due diligence by category[20]



Category	Share of spend
Fuel	23%
Ground Services	23%
Inflight Goods and Services	12%
Food and Beverage	9%
ICT	7%
Property	6%
Marketing and Promotions	5%
People	3%
Corporate Goods and Services	3%
Aircraft Equipment and Maintenance Services	2%
Loyalty Costs	2%
Aviation	2%
Freight	1%

19 Suppliers may have a footprint in more than one geographic location; this chart represents the location from where the product or service is being provided to the Group, as disclosed by the supplier or third-party during the advanced due diligence process.

20 Percentages have been rounded. This chart reflects only the percentage of total suppliers and other third-parties assessed through advanced due diligence.

Engaging with our suppliers through site visits

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 FY25, we continued to prioritise engagement with selected tier one and two suppliers. This included in person visits by representatives from our Catering, Customer Product, or BIC team to more than 10 sites across various countries including Singapore, UK, Italy, China, and Thailand. These were a mixture of tier one and tier two facilities across various industries including catering and factories manufacturing packaging, amenity kits, textiles including bedding, and other inflight products. We also visited two Australian facilities, including a laundry services provider.

Where relevant, our Customer Product team applied our modern slavery indicator tool during these site visits. Developed in FY24, the tool sets out a suite of questions related to modern slavery and broader labour rights issues using an 'Expectation, Enquire, and Observe model'. These questions 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.

This model aims to support 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).

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

During the reporting period, our site visit program provided valuable additional context for us about how our suppliers operate and where modern slavery and other broader human rights risks may be present. Typically, we find the greater scope for in-person engagement during site visits enables more meaningful dialogue and access to information about suppliers' practices. 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 can provide an opportunity for us to build an understanding of day-to-day working conditions on site. For example, during a site visit to one factory that included on site worker accommodation, we requested to see the dormitory. This enabled us to identify and discuss opportunities with the supplier to improve worker welfare by addressing accommodation-related observations. Our site visits also facilitated in person conversations about topics such as labour practices, subcontracting, and recruitment channels in a way that would have been challenging to achieve online.

As our site visit program continues to mature, we are working to identify key lessons learned to help increase our effectiveness in this area. For example, the accuracy of interpretation can be a challenge with site visits in some locations where local dialects are used. Certain terms such as 'grievance mechanism' may also lack direct equivalents in some local languages. This can require our team to carefully explain and contextualise our expectations. While factory management may speak one or more national languages or English, language barriers may prevent or limit scope for incidental engagement with workers on site as part of a visit. To help address these challenges we are considering how we can improve communication during site visits, particularly in regions where local dialects are spoken. This includes language support measures and opportunities to leverage technology to support real-time interpretation and understanding.



Tailoring our due diligence approach to different business relationships

While our due diligence approach includes a strong focus on our suppliers, as an airline we are also exposed to potential modern slavery risks through our partner relationships.

In FY24, the BIC team worked with Qantas Loyalty and Group Procurement to develop a tailored due diligence framework for our partnership relationships. This included a profiling exercise that identified four key partnership types (such as airlines and retail), further broken down into 13 sub-categories. The analysis assessed contract structures, payment arrangements, and the nature of each partnership's connection to the Group. This enabled us to determine which relationships fall within the scope of our standard SCA program and which require a bespoke, risk-based due diligence approach to manage modern slavery and other potential risks.

Building on the profiling activity completed in FY24, we continued to embed our tailored approach to third-party due diligence into BAU activities throughout FY25. This work reflects our recognition that the nature of risks associated with strategic partnerships, such as those associated with our Loyalty business, present a different set of risks than our supplier relationships, For example, supplier risks are typically labour-related, and may involve workplace conditions, and conformance to broader social standards. In contrast, strategic partnerships are generally not labour-based and are more likely to involve commercial or reputational risks. As a result, we formalised a differentiated process to better identify and manage modern slavery and other relevant risks in these contexts.

In FY25, we progressed this work by:

- Formalising the framework for due diligence of third parties outside the SCA program, including clear articulation of internal roles and responsibilities.
- Establishing criteria for when to undertake targeted engagement with partners based on areas of elevated risk, including modern slavery risks.
- Strengthening the Program Partner Selection and Monitoring Guidelines to better define how and when Loyalty teams should engage with BIC.

While due diligence activities for some partnership relationships were already underway, our focus in FY25 has been on embedding this framework to support a consistent and effective approach in managing modern slavery and other relevant risks across all relevant third-party relationships.



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.

During the reporting period, through our due diligence activities we identified and responded to potential indicators of modern slavery reported in our supply chain, such as excessive overtime and charging of recruitment fees by suppliers. Our crew also identified and reported three human trafficking related concerns. We have assessed that these indicators and concerns did not amount to incidents of modern slavery. We understand that these practices may be deeply embedded in global supply chains and can therefore be challenging to detect. While we have not identified, and therefore not taken steps to remediate instances of modern slavery, we have worked to address the indicators raised. 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 know that maintaining trusted and accessible grievance mechanisms is key to building a "speaking up" culture. In FY25 we continued to progress work to improve the effectiveness of our grievance mechanism, including to explore options for alternate reporting channels to further strengthen the accessibility of reporting pathways for modern slavery and other concerns.

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. Our Whistleblower Policy expressly states the mechanism is 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 are informed by the expectations set out in the UNGPs (see page 21) (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.

Maintaining trusted and accessible 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. Following our review of the effectiveness of our grievance mechanisms in FY24, we expanded the language offering of our Whistleblower program in FY25. This has enabled us to offer the service in the 12 languages (other than English), which are the most common languages used in Qantas' key supply chain locations.

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 FY25

Qantas continues to promote its Whistleblower program as a channel for reporting concerns related to the Qantas Group, including human rights-related issues. As in previous years, the majority of reports received through our Whistleblower channels in FY25 related to breaches of internal policies and behavioural matters.

In FY25, we received one report that made reference to human rights grievances however, upon further review, the allegations did not identify any human rights concerns. While this report indicates that human rights-related matters can be raised through the Whistleblower program, we acknowledge that ongoing work is needed to build broader awareness and confidence in using this channel for such issues. In FY25, we also received and responded to three reports regarding matters occurring within our supply chain.

'Speak Up' campaign

We recognise that maintaining trusted and accessible grievance mechanisms requires ongoing effort. In FY25, the Group launched a 'Speak Up' campaign to encourage safe and transparent reporting by promoting the availability of channels and ways in which our people can report matters of concern including business integrity and ethics issues as well as broader human rights and safety matters. A communications and engagement campaign designed to raise awareness, inspire action, build organisational support and strengthen confidence in our reporting channels was launched. The campaign featured CEO and executive leader communications, an online information hub, digital and printed media to promote awareness, and briefing and dial-in sessions attended by more than 1,300 leaders.

One of the key materials developed for the campaign was a 'Speak Up Leader Toolkit'. The toolkit aims to equip leaders to foster a safe, open, and accountable workplace, including to support the reporting of human rights related concerns such as modern slavery. The toolkit outlines different reporting pathways, suggestions for starting conversations with team members about the importance of speaking up, and guidance about how to respond as a leader if concerns are raised directly with them.

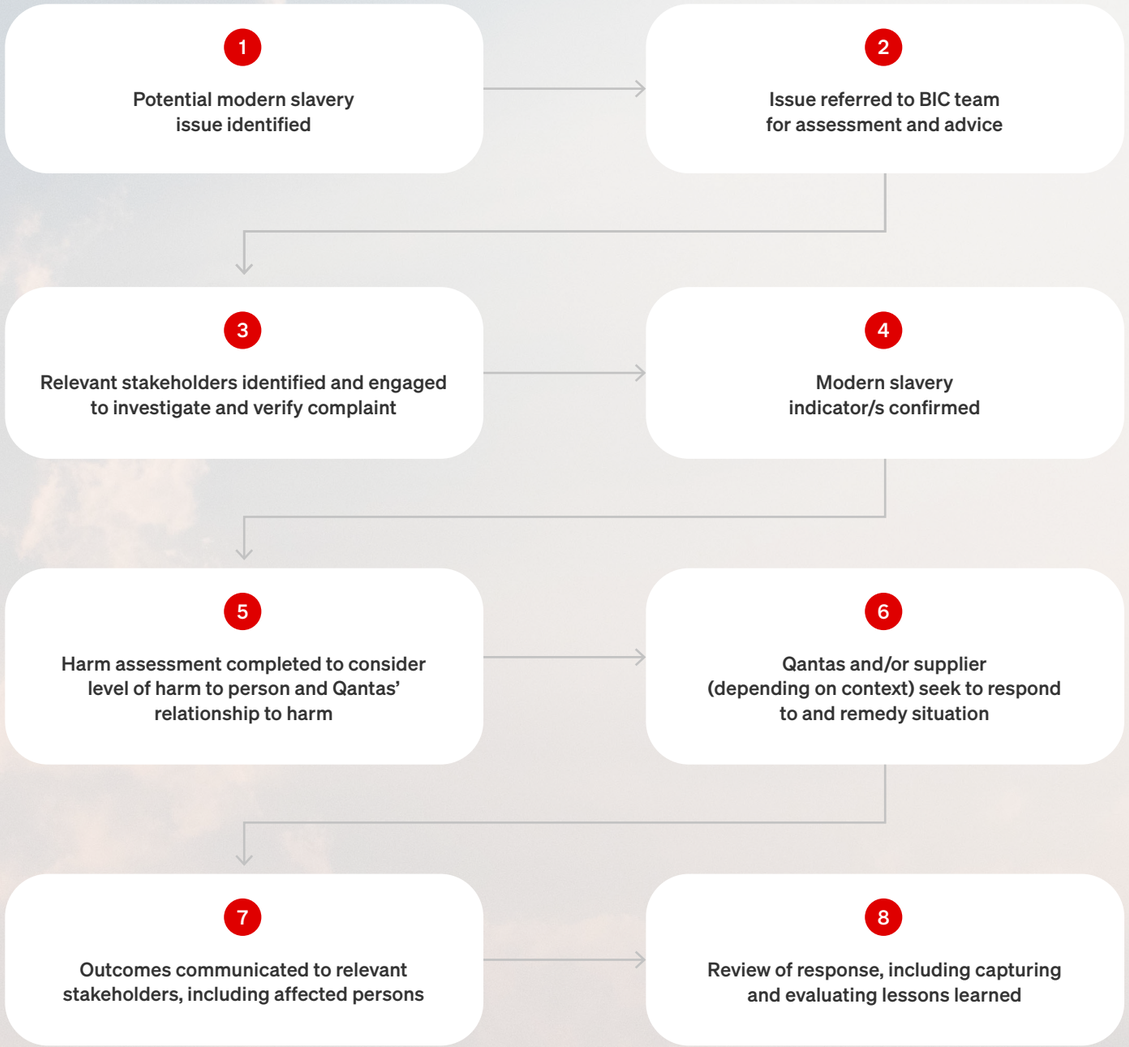
Key Reflections

The involvement of the CEO and executive leaders boosted the visibility of the 'Speak Up' campaign and helped reinforce the message that speaking up is valued and supported across all levels of the organisation. A multi-channel approach, combining digital, printed, and live engagement formats supports broader accessibility and reinforcement of key messages, particularly for frontline and remote workers. Following the campaign, there was a noticeable increase in reporting activity, suggesting improved awareness of available channels and greater confidence among employees in using them.

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 and guidance to our people about how to identify and report modern slavery red flags (see page 16).



Guidance to support cabin crew and other operational staff to identify and respond to human trafficking

As an airline there is a risk our services could be used by third parties to facilitate human trafficking. During the reporting period, our cabin crew identified and reported three suspected incidents relating to potential human trafficking or other forms of modern slavery involving both male and female passengers.[21] These suspected incidents occurred on domestic routes, and Qantas referred one of the suspected incidents to law enforcement.

Following these suspected incidents, we took additional steps to further support our cabin crew in identifying and responding to suspected human trafficking concerns in real time. To supplement the existing training, we developed practical onboard guidance for Jetstar cabin crew, including when to notify law enforcement. This guidance is now included in the relevant Aircrew manuals and is designed to be accessible for reference by cabin crew during flights. The guidance identifies ten key human trafficking indicators relating to passengers' behaviours and situational cues. Importantly, the guidance underscores that the safety of any suspected person experiencing human trafficking, as well as that of the crew and other passengers is paramount. While the guidance has already been implemented within our Jetstar business, the BIC team is continuing to work with relevant areas to support the expansion of similar guidance for crew across other Qantas flying businesses.

In addition, corresponding updates were also made to the Qantas Group Security Manual, which is accessible to all employees, including non-cabin crew roles such as our ground staff and airports teams. These updates provide guidance to support personnel in determining whether to engage with law enforcement on a suspected incident. This includes considering any requests for help that may have been made by the relevant passenger and the level of any immediate risk to the safety of the passenger. The updates also explain the types of detail that should be included in internal reports flagging suspected human trafficking, including the behaviours observed that raised red flags.



21 We highlight in training and support materials that anyone, regardless of sex, may be subject to potential exploitation through trafficking.

Engaging with suppliers in regional and rural locations

Modern slavery can occur in Australia, as well as in offshore supply chains. One context where modern slavery and other serious labour rights harm could occur is in relation to the provision of lower skilled labour by suppliers in rural and regional locations. This includes services involved in aircraft turnaround, such as cleaning and other ground crew services.

There are a number of reasons why labour rights risks may be higher in these contexts. This includes difficulties monitoring working conditions in rural and regional locations where we may not have a permanent staffing footprint. Suppliers in these locations may be smaller than those used at major ports and therefore have less mature risk management processes in place, and may also face difficulties recruiting workers due to labour shortages.

During the reporting period, we maintained engagement with a small number of suppliers operating in rural and regional Australia on matters identified through our due diligence process and through concerns raised by two workers at separate supplier sites in FY24. None of these matters involve indicators of modern slavery. As part of this engagement, we took steps to better understand the operational challenges that may be faced by service providers in regional locations. For instance, some suppliers may experience infrequent and variable flight schedules which can impact shift patterns, working hours and overtime scheduling. By engaging directly with these suppliers, we aim to identify any potential risks to workplace standards that may arise from these factors and to explore appropriate mitigation actions in these contexts.

Key reflections

In some locations, the limited availability of alternative suppliers can restrict our leverage, and this introduces a range of operational and commercial challenges, which may be heightened where a supplier is reluctant to engage with us. We recognise that smaller suppliers in these areas may face practical constraints in upgrading systems or processes, especially when they provide low volumes of services. In such contexts, our ability to influence change is shaped by both the nature of the commercial arrangement and the broader dynamics of our relationship with the supplier.

Additionally, in rural and regional contexts, we have observed that suppliers' workers may be comparatively more likely to raise concerns directly with Qantas staff (for example, informally during a site visit) rather than using other available grievance channels. This underscores the importance of ensuring our people understand how to identify and escalate potential red flags related to suppliers' working conditions.

Looking ahead: Strengthening supplier capability and alignment

We are exploring ways to further support suppliers in strengthening workplace practices. Our focus is on building supplier awareness and understanding such as by improving access to guidance materials. In addition to outlining our expectations through our Supplier Requirements and Supplier Code of Conduct, we are also looking at how we can enhance the communication of our expectations. We are also considering how our procurement processes particularly during tender and bid evaluations, can encourage respondents to appropriately consider labour related factors as part of commercial proposals.

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 Federal Police has disclosed they recieved 420 reports of human trafficking in FY25 (increased from 382 in FY24), with 126 of those related to entry, exit, and child offenses. 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 where appropriate. Information about the training and resources we provide to our cabin crew and other staff is set out on page 16 and page 21.

We engage with law enforcement agencies on a range of matters concerning the aviation sector, this may include for example responding to formal requests for information from relevant authorities to support investigations into suspected criminal activity such as human trafficking and child exploitation. Across FY25, we continued our broader engagement with the Australian Federal Police (**AFP**) as outlined on page 23.

Responding to charging of recruitment fees in our supply chain

In FY23 and FY24, we reported on our engagement with a tier two supplier in Thailand. During a routine desktop review of the supplier, we identified potential risks related to the possible payment of recruitment fees by migrant workers. Through a subsequent site visit, we were able to obtain documentation about the supplier's recruitment practices, including the use of recruitment agencies. Further assessment indicated that while the tier two supplier did not directly charge recruitment fees to its foreign workers, some workers were charged recruitment fees in connection with their employment by third-party recruitment agencies in their source country.

We subsequently worked closely with our direct tier one supplier who engaged an external specialist with experience in this area to investigate this issue. 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. The external specialist conducted interviews with potentially affected workers with support from independent translators.

Importantly, the investigative process did not identify any evidence that the charging of recruitment fees was associated with modern slavery practices by the tier two supplier or third-party recruitment agencies. For example, there were no indications workers at the factory were subjected to exploitive workplace practices, or had their movements restricted. However, we recognise the charging of recruitment fees to workers is problematic and requires a human rights-informed response.

As part of the investigation, the specialist also identified opportunities to uplift the tier two supplier's policies, process, and controls around migrant recruitment. Our direct supplier also engaged with the tier two supplier to build awareness and capability in this area and influenced the factory to adopt a strengthened approach, including a zero-recruitment fee policy.

During the reporting period, we continued to engage both with our direct supplier and the tier two supplier on remediation measures. This included discussions on the approach for the tier two supplier to reimburse affected workers for fees paid, adjusted for inflation, and implementing measures to help prevent similar issues from occurring in the future. Progress was not linear and was influenced by the factory's shared ownership structure, which introduced varying degrees of willingness to engage in remediation. Differences in appetite for action among the owners, added complexity and required ongoing dialogue to align on a path forward. In June 2025, together with our tier one supplier, Qantas representatives, including our modern slavery SME, visited the site to meet with the factory owners and key factory managers. During this meeting, we delivered a training session for our tier one supplier and some of the factory owners and managers. This included training on human rights, the ways in which businesses can be involved in human rights harm and the application of the UNGPs, recruitment fees and how they may harm human rights, case studies on recruitment fees, and the business case for repayment of fees. Following this meeting, the tier two factory committed to a range of remediation actions, including the reimbursement of fees to affected workers. We continue to collaborate with the supplier on the practicalities of reimbursement, such as the development of a repayment plan including methods of repayment and timelines, communication to workers, and a verification process to confirm repayments have been made. As part of this, the factory will undergo social audit training in late 2025 and another audit in early 2026.

Key reflections

Using our leverage

From the outset, we sought to align our approach to this issue with the expectations set out in the UNGPs. This included seeking to use and build our leverage to drive change and facilitate remediation. A key challenge in this context was the comparatively low level of our spend with the tier two supplier. The tier two supplier indicated to us it also works with major global companies, none of which had identified the same concerns as us relating to recruitment fees. Visiting the tier two supplier site to engage with the factory owners directly was an important step in building our leverage and supported us to agree an approach to remediation with the parties involved.

Worker interviews were instrumental in understanding complex recruitment fee arrangements

We observed complexity in the ways recruitment fees were charged. For example, some interviewed workers were charged fees by recruitment agents in their home country, and whilst some had documented evidence of fees paid, others had not kept receipts. Given the time that had passed, workers without documentation found it difficult to remember fees paid. Additionally, some of the workers had initially paid fees in connection with recruitment for previous employment. In some cases, workers were also not familiar with the concept of 'recruitment fees' making it important to establish a common understanding of terms used. These interviews supported our conversations with the tier one supplier to understand the breadth and complexity of potential remediation actions.

Complex ownership structures can impact remediation

The shared ownership model of the tier two factory introduced varying levels of willingness to engage in remediation, highlighting the importance of early stakeholder alignment and sustained dialogue when navigating complex issues.

Direct engagement builds trust and momentum

The site visit by Qantas representatives, including a modern slavery SME, was instrumental in progressing discussions. Face-to-face engagement helped build trust, clarify expectations, and facilitate agreement on a remediation pathway.

Training enhances understanding and drives action

Delivering targeted training to factory owners and managers covering human rights, recruitment fees, and the business case for remediation was impactful, deepening understanding, and encouraging commitment to ethical practices. One indicator of the effectiveness of this training was that the factory changed its position on remediation after the session was delivered.

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 5 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.

Global Compact Network Australia

Global Compact Network

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 shared approaches to identifying modern slavery risks; challenges and barriers to progress and how they are being overcome; and how business are approaching engagement with rights holders or people with lived experience. Additionally, the MCOP forum provided opportunity for direct engagement and consultation with both the Australian Anti-Slavery Commissioner and the New South Wales Anti-Slavery Commissioner. Qantas also sponsored the inaugural United Nations Business and Human Rights Regional Forum: Australia and New Zealand. This event was held in August 2025 but sponsorship arrangements were confirmed during the reporting period covered by the statement.

MODERN SLAVERY AVIATION FORUM

Modern Slavery Aviation Forum (MSAF)

Across FY25, representatives from Qantas, Virgin Australia, and Air New Zealand continued to meet through the MSAF. The MSAF was established in 2024 and provides a trusted space for airlines to share learnings and discuss industry challenges in addressing modern slavery, within the boundaries of competition law. The MSAF convened formally three times during the reporting period, discussing topics such as approaches to supplier due diligence as well as human trafficking. This included sharing approaches to crew training aimed at supporting the identification of passengers who may be at risk of human trafficking; and exploring appropriate responses to suspected incidents, recognising the complexities of responding to suspected cases at international ports. Members also met with the Australian Anti-Slavery Commissioner and his team to discuss modern slavery risks, and explore insights and experiences relevant to the aviation sector and opportunities for ongoing engagement with the Commissioner's Office.

Australian Government Attorney-General's Department

NSW GOVERNMENT

Australian and New South Wales Government

Qantas maintains dialogue with the Government and its agencies on a broad range of issues, including in relation to human rights. During the reporting period for example, we continued to engage with the Australian Federal Police, including meeting with the NSW Human Exploitation Community Officer. Qantas also attended the New South Wales Anti-Slavery Commissioner's Online Anti-Slavery Forums held in November 2024 and May 2025.

UNITED NATIONS HUMAN RIGHTS SPECIAL PROCEDURES
SPECIAL RAPPORTEURS, INDEPENDENT EXPERTS & WORKING GROUPS

UN Special Rapporteur on contemporary forms of slavery

Qantas engaged with the Special Rapporteur Professor Tomoya Obakata during his country visit to Australia in November 2024. At the invitation of the NSW Anti-Slavery Commissioner, Qantas participated in a consultation forum with the Special Rapporteur, which included discussion of the role of business in addressing modern slavery risks.

IATA

IATA

Qantas is an International Air Transportation Association (**IATA**) member. We actively contribute to the development of international standards and practices for global airlines, including historically 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 21). We continue to explore opportunities to engage with IATA and other airlines on human trafficking initiatives.



Section 5: How we assess our effectiveness

For the Group, being effective in managing modern slavery risks means that we enable positive change through our actions and are able to communicate how we achieve this. Our BIC function is primarily responsible for considering the effectiveness of our actions with executive management oversight from our PMB (see page 13). During the reporting period, we also successfully closed out findings from an internal audit of our modern slavery response in FY24. This internal audit identified a range of opportunities to help us further improve the effectiveness of our response.

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. We continue to strengthen our ability to assess the effectiveness of our actions in terms of impact on the ground. For example, during the reporting period, we supported efforts to improve outcomes for workers in our supply chain, including facilitating a commitment by a tier two supplier to reimburse recruitment fees paid by workers at a packaging facility in Thailand (see page 22). To help evaluate the effectiveness of this initiative, the supplier is scheduled to undergo a social audit in early 2026.

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 revised our Supplier Code of Conduct to reinforce our commitment to ethical and responsible business practices, including in relation to addressing excessive working hours and overtime (page 14). — We continued to engage with peers through the Modern Slavery Aviation Forum to share learnings and discuss industry challenges in addressing modern slavery (page 23).
Meaningful risk assessment and broader due diligence processes that enable the accurate and timely identification and prevention or mitigation of potential modern slavery risks.	— The Board and senior leadership have oversight of our modern slavery response. — 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 assessed through our SCA program. — Tracking completion rates for our training and monitoring feedback from participants.	— We delivered a strategic briefing to the Board on modern slavery and broader human rights issues and established senior management oversight of our modern slavery response through the PMB (page 13). — We undertook a Child Safeguarding Risk Assessment in collaboration with DFAT and the ACF (page 10). — We delivered a range of modern slavery and broader human rights related training and awareness-raising activities (page 16 and page 20). — We continued to embed our tailored approach to third-party due diligence into BAU activities (page 16). — We initiated assessments for more than 1,700 suppliers through our SCA program (page 18). — We visited three offshore catering facilities, eight offshore supplier sites, and two Australian facilities (page 19).
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 expanded the language offering of our Whistleblower program to the 12 languages most commonly used in Qantas' key supply chain locations (page 20). — We launched a 'Speak Up' campaign to raise awareness of ways in which our people can report matters of concern, including modern slavery and other human rights issues (page 20). — We engaged with a tier two supplier on their progress to remediate recruitment fees paid by migrant workers at their factory, including their planned approach to reimburse workers (page 22). — We continued to engage with a small number of suppliers operating in rural and regional areas in Australia on matters identified through our due diligence and through concerns raised by two workers at separate supplier sites (page 22). — We developed practical onboard guidance for Jetstar cabin crew about identifying and responding to suspected modern slavery concerns and made corresponding updates to the Qantas Group Security Manual (page 21). — We identified three suspected human trafficking incidents on domestic routes and have continued to integrate learnings from any reports made (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

Our whole-of-group consultation process

This Statement was developed though 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.

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, 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 People Officer, Chief Corporate Affairs and Communications Officer, the 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 TripADeal.

We used this additional consultation to inform our understanding of any changes since FY24, 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 includes more than 30,000 employees (FY24: 29,000) across 27 countries (FY24: 27).[22] Of these, 94 per cent (FY24: 94) are directly employed by a Group entity, either through individual contracts or collective agreements.

In Australia, 83 per cent (FY24: 82) of our employees are in operational roles such as pilots, cabin crew, engineering, maintenance, customer service, freight operations, and safety. The remaining 17 per cent (FY24: 18) provide operational support in areas such as aircraft load control, meteorology, flight planning, and corporate services including Risk and Compliance, Finance, Legal, Treasury, Corporate Affairs, Human Resources, and Sustainability. Internationally, 91 per cent (FY24: 91) of our employees are in operational roles with the remaining 9 per cent (FY24: 9) providing operational support.

We also have indirect workers who deliver services under contracts with specialist providers. These include contractors, and outsourced labour supporting areas like Cabin Crew, Ground Handling, Baggage Services, Catering, Cleaning, Security, IT, and Payroll.

Qantas

Domestic and International

- 21,472 Employees across 24 countries
- 90% On shore
- 98% Directly employed
- 86% Full time / 14% Part time
- 85% Australian-based employees under EA
- 870 Contractors, fixed term or casual

Jetstar

(incl: Jetstar Airways and Jetstar Asia)

- 7,254 Employees across 11 countries
- 75% On shore
- 82% Directly employed
- 85% Full time / 15% Part time
- 74% Australian based employees under EA
- 1,476 Contractors, fixed term or casual

Qantas Freight

(AAE, EFA, JETS, and Qantas Courier)

- 958 Employees across 11 countries
- 92% On shore
- 100% Directly employed
- 94% Full time / 6% Part time
- 90% Australian-based employees under EA
- 23 Contractors, fixed term or casual

Qantas Loyalty

(incl: Taylor Fry, Vii and TripADeal)

- 1,026 Employees across three countries
- 99% On shore
- 100% Directly employed
- 95% Full time / 5% Part time
- 3% Australian based employees under EA
- 19 Contractors, fixed term or casual

Across our workforce

46% of our people identify as female

54% of our people identify as male

7.8% female pilots

<1% prefer not to nominate

1.5% of our people identify as Aboriginal or Torres Strait Islander

22 Total number of employees of wholly owned entities of the Qantas Group, as well as Jetstar Asia Airways Pte Ltd, and majority owned entities Holiday Tours, Travel Ltd, Taylor Fry Holdings Pty Ltd, and TripADeal Pty Ltd. This number is correct as of the end of the reporting period 30 June 2025.

Appendix 2: Our associated businesses — TripADeal

Structure, operations, and supply chains

TripADeal is an Australian based travel business established in 2011. TripADeal was wholly acquired by Qantas Frequent Flyer Limited, which is wholly owned by Qantas Airways Limited, on 28 June 2024. The TripADeal business includes three reporting entities for the purposes of the Australian MSA: TripADeal Pty Ltd (ACN 149240433), which is a wholly owned subsidiary of TripADeal Holdings Pty Ltd (ACN 617898263), which is also a wholly owned subsidiary of TAD HoldCo Pty Ltd (ACN 637674376) (TAD HoldCo). As the TripADeal business is distinct from the rest of the Qantas Group and continues to operate as an independent business, this Appendix sets out additional information about TripADeal to address the mandatory criteria in the MSA. The content in this Appendix should be read together with the full Qantas Group Statement. Day to day management of TripADeal's modern slavery risks is the responsibility of its executive management team. The Qantas Board is ultimately accountable for TripADeal and has approved this Appendix and the broader statement in its capacity as a governing entity under the MSA.

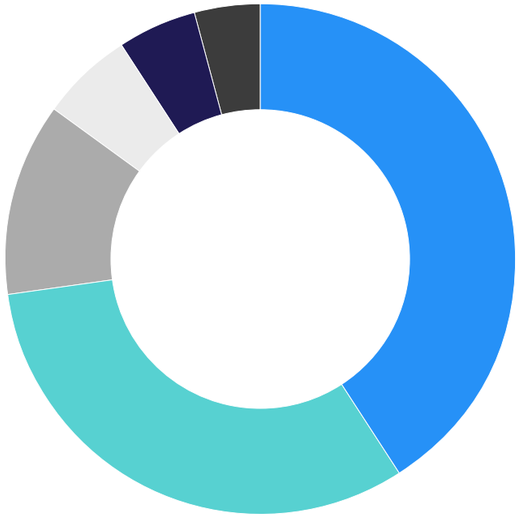
TripADeal is headquartered in Byron Bay, New South Wales with additional office locations in Brisbane and the Gold Coast (Queensland, Australia). The company also operated an office in Denpasar, Indonesia focused on resort-based product procurement, which was closed during the reporting period as our commercial focus shifted to Tours and Cruises. TripADeal Pty Ltd is the only trading entity in the group and is also the employing entity. Employee breakdown for TripADeal has been included in the Group totals in Appendix 1.

As an online travel agent, TripADeal offers travel packages and products for both domestic and international travel. TripADeal contracts services that include accommodation, tours, activities, flights, cruises, transfers, and other associated travel product and service offerings and package them to sell to customers. These products and services are provided by third parties and are not delivered by TripADeal.

Supply chains

TripADeal procures a range of products and services spanning a wide variety of industries, to support its core business activities. In FY25, TripADeal's supply chain included approximately ~250 suppliers who provided services as part of its travel products and packages, spanning across approximately ~95 countries. TripADeal's total supplier spend in FY25 was $450 million, with the largest category of spend being Tours and Operators followed by Flights and Cruises. The chart below represents the key categories of spend and on the following page we have included an indicative regional breakdown of suppliers.

TripADeal key procurement categories



Category	Share of spend
Tours and operators	41%
Flights	32%
Cruises	12%
Media and marketing	6%
Hotels	5%
All other suppliers including sponsorship, professional services, IT, and office expenses	4%

$450 million
Total supplier spend[23]

Approx. 42%
Total spend with Australian suppliers

624
Tier one suppliers

74%
Spend with top 20 suppliers

23 This includes both spend with third-party travel suppliers (tours, flights, cruises and hotels) for customer packages and business-related spend.

Although operating as a global business, TripADeal's purchasing volume is a highly variable proportion of its travel suppliers' overall business, resulting in a varied ability to influence supplier practices. TripADeal maintains an established, long-tenured base of on-ground tour operator suppliers. These ongoing relationships are governed by contracts, which provide TripADeal with a greater opportunity to set expectations and encourage good supplier practices. Conversely, when engaging with major providers, particularly airlines and cruise lines, TripADeal's purchasing scale relative to the supplier can be much lower, impacting the level of commercial influence.

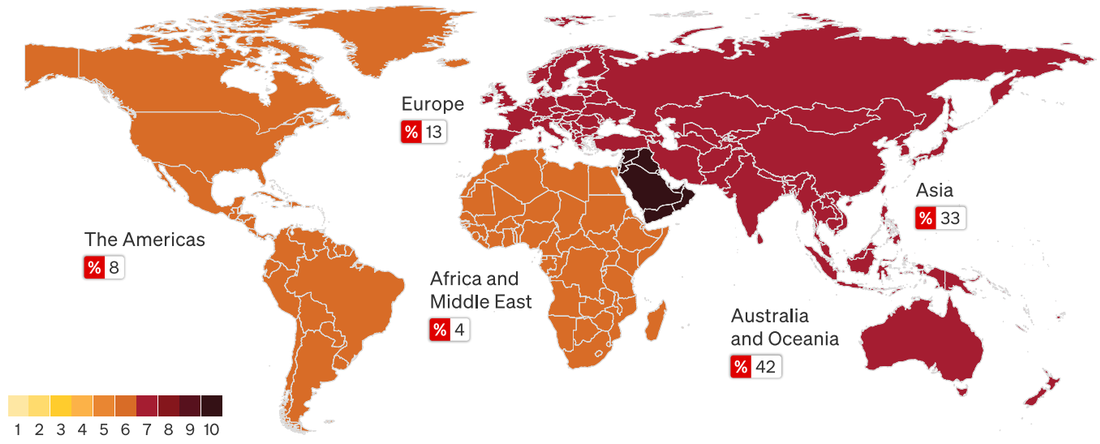
Modern slavery risks

TripADeal has assessed that its direct operations do not involve significant modern slavery risks. This reflects the nature of its workforce, which undertake white collar office-based roles and are engaged in accordance with relevant workplace laws and conditions.

There are a range of modern slavery risks involved in the supply chains of travel and tourism sector that could be relevant to TripADeal's supply chain. For example, in hotels, typical concerns include unpaid overtime or wage deductions for housekeeping and laundry staff, exploitative recruitment fees for migrant workers, informal or absent contracts for night or casual staff, and upstream risks (for example in linen or food supply). On cruises, risks often affect galley, housekeeping, and hospitality crews with potential for long hours, withheld pay, agency recruitment fees, and limited freedom of movement. Local tour operators and activity providers face risks from informal pay arrangements for guides, drivers and porters, unsafe working conditions for casual staff or animal handlers, child labour in craft or textile workshops, and exploitative practices in seasonal recruitment.

The table to the right identifies potential risks for the travel and tourism sector, and drawing on the UNGPs, provides hypothetical examples of how businesses in this sector may be involved.

TripADeal regional breakdown of suppliers



Represents the estimated prevalence of modern slavery by region according to the Walk Free Global Slavery Index (noting estimated prevalence per 1,000 population).

% Percentage of TripADeal procurement spend in each country based on accounts payable.

Potential risks for the travel and tourism sector	Relevant risk factors	Hypothetical example	How we could be involved
Workers engaged by third parties to provide services to support tour activities (such as hospitality and cleaning) could be exploited through modern slavery		Lower-skilled maintenance workers engaged to work on a cruise ship could be exploited through modern slavery (and may be particularly vulnerable to exploitation because they are unable to leave the vessel).	Directly linked
Products provided by third parties and used to support tour activities (such as catering or linen in hotels) could be produced using modern slavery		Food provided to tour participants by third parties during organised events (such as seafood) may have been produced using modern slavery.	Directly linked
Souvenirs sold to tour group members as part of organised tour activities could be made by third-party sellers using modern slavery		The worst forms of child labour could be used to manufacture textile souvenirs.	Directly linked
Services provided by third parties to support travel companies' corporate operations could be provided using exploited workers		Subcontracted cleaning workers used at a corporate office (including in Australia) could be exploited through modern slavery.	Directly linked
Products provided by third parties to support travel companies' corporate operations could be produced using exploited workers		Building materials and furniture used in the refurbishment of a corporate office could be produced using modern slavery (such as bricks, timber, and natural stone products).	Directly linked

Actions taken to assess and address modern slavery risks

Following the full acquisition of TripADeal by Qantas Airways Limited, on 28 June 2024, a range of activities have been undertaken to support integration efforts with the Qantas Group, some of which including activities to support modern slavery risk management.

Key actions have included TripADeal:

— adopting the Group Code of Conduct, which includes requirements relating to modern slavery (see page 14)
— embedding Qantas' standard contractual clauses relating to modern slavery and other human rights issues into its contracting processes, and
— completion of the Qantas Acting with Integrity training, which includes content related to modern slavery (see page 16).

KEY

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

Enhancing risk profiling and due diligence for TripADeal suppliers

In FY25, the BIC team led a risk profiling initiative to strengthen TripADeal's approach to identifying and managing modern slavery risks within its supplier base. Recognising the unique nature of TripADeal's operations, which span a diverse network of suppliers across accommodation, transport, cruise operators, and local experience providers, the initiative aimed to develop a risk-based approach to prioritise suppliers for due diligence.

The profiling methodology considered key factors such as country of operation, sector-specific risk, frequency of engagement, and the nature of the supplier relationship (e.g. direct and ongoing contractual arrangements versus one-off or distressed suppliers). Working in collaboration with TripADeal, suppliers were segmented and prioritised, with over 120 suppliers subject to an initial level of screening.

In parallel, the BIC team developed a tailored due diligence and risk methodology, adapting the Qantas Group SCA due diligence questionnaire to better reflect TripADeal's operational context and risk profile. TripADeal will leverage Qantas' third-party risk management platform Exiger to support its supplier risk management approach. Looking ahead to FY26, TripADeal will commence deeper due diligence activities across its prioritised supplier base.

Key reflection

A key reflection from this initiative is the importance of recognising and responding to the varied maturity levels, structures, and capabilities that can exist across newly acquired businesses. TripADeal's operational model and supplier landscape differ significantly from other parts of the Qantas Group, requiring a tailored approach to risk management. This experience has reinforced the need for flexibility in applying Group-wide frameworks, and the value of early collaboration to ensure that human rights risks are addressed in a way that is both practical and proportionate to the business context.

Assessing effectiveness

The TripADeal executive management team remain responsible for overseeing its modern slavery response, including driving implementation of its modern slavery risk management actions and monitoring its effectiveness.

Appendix 3: Our associated businesses — Taylor Fry

Qantas Loyalty also manages the Group's interests in certain associated businesses, which are described in the table on page 5 and include Taylor Fry (an actuarial and analytics services provider). At 30 June 2025, Taylor Fry had 109 direct employees located in Australia (100) and New Zealand (9). The nature of our associated businesses' operations means that they may operate independently from the wider Group and use different supply chains.

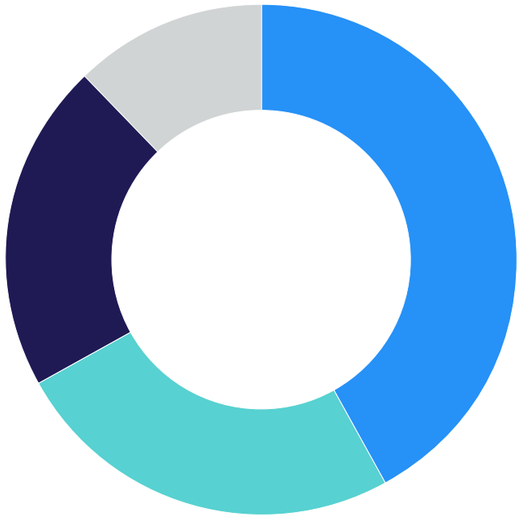
We understand the importance of working to address any modern slavery risks that may be associated with these businesses, including by integrating them into our wider modern slavery risk management response. For example, Taylor Fry personnel are not subject to Group policies and procedures and it does not procure through the Group Procurement function. Taylor Fry undertakes its own sourcing activity and across its own supply chain has 160 tier one suppliers. Taylor Fry's procurement spend was $5.2 million across suppliers based in six countries. The nature of the suppliers ranges from IT service providers (31), rent and property related services (21), office supplies (9), consultants (18), and a number of other service-based suppliers. Of Taylor Fry's 160 tier one suppliers in FY25, 124 are based in Australia, 27 in NZ, four in the UK, three in the US, and one each in Canada and Germany. Taylor Fry only sources non-resale products and services to support its business operations.

While, as a professional services business, the risk of modern slavery in its operations is assessed as low, we recognise that procurement of IT and property services more generally can involve modern slavery risks, including the provision of cleaning and facilities management, and the prevalence of potential forced labour or child labour that may exist deep in supply chains associated with the raw materials used IT equipment.

Across FY25, our BIC team continued to work with Taylor Fry to support its modern slavery response, key activities included:

- undertaking screening of ~26 selected tier one suppliers via Exiger, focusing on remaining unassessed suppliers across rent/property, IT, and office cost categories; and;
- continued the required learning roll out for all Taylor Fry employees for the Acting with Integrity training course, which includes a modern slavery awareness module. This training was completed by 77 employees during FY25.

Taylor Fry key procurement categories



Category	Share of spend
Others (Insurance, memberships, subscriptions, office costs, training, and education of employees)	42%
IT	25%
Rent/Property	21%
Insurance	12%

$5.2 million
Supplier spend

160
Tier one suppliers

93%
Spend in Australia

6%
Spend in NZ, US, and UK



Appendix 4: 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 last updated in FY24 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 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, 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.
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 revised our Supplier Code of Conduct during the reporting period (see page 14) to reinforce our expectations for suppliers to align with our ethical and responsible business practices, including addressing excessive working hours and overtime. 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 set out the standards we expect from suppliers and their personnel (including their sub-suppliers). The Supplier Requirements, which also include our Group Compliance Statement, 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. 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. We seek to mandate compliance with our Supplier Requirements and Group Compliance Statement, which include human rights and modern slavery provisions, in relevant contractual arrangements. 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 5: Stakeholder engagement

While page 17 and page 23 outline how we engage with external 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. The stakeholders below are included based on their ability to impact Qantas, as well as our impact (or potential impact) to 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 in June 2024, which is a monthly live stream interview with our CEO.
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 in the case studies on page 19 and page 22.
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 79.7 per cent (offshore and onshore) of our employees are set through enterprise agreements. Qantas recognises and supports the rights of freedom of association.

Appendix 6: List of reporting entities and owned or controlled entities[24]

AAL Aviation Limited[25] (83 008 642 886)
The principal activities during the period were that of a non-operative holding company.

Airlink Pty Limited[25] (76 010 812 316)
The principal activities during the period were to provide passenger air transportation services.

Australian Air Express Pty Ltd[26] (74 054 307 336)
The principal activities during the period were the provision of freight ground operation services.

Australian Airlines Limited[26] (85 099 625 304)
The principal activities during the period were that of a dormant non-operative company.

Australian Regional Airlines Pty. Ltd.[25] (25 006 783 633)
The principal activities during the period were that of a non-operative holding company

Eastern Australia Airlines Pty. Limited[25] (77 001 599 024)
The principal activities during the period were to provide passenger air transportation services.

Express Freighters Australia (Operations) Pty Limited[26] (54 119 093 999)
The principal activities during the period were the employment, training, and provision of personnel.

Express Freighters Australia Pty Limited[25] (73 003 613 465)
The principal activities during the period were to provide freight air transportation services.

Impulse Airlines Holdings Proprietary Limited[25] (67 090 590 024)
The principal activities during the period were that of a non-operative holding company.

Jetstar Airways Pty Limited[25] (33 069 720 243)
The principal activities during the period were to provide passenger air transportation services.

Jetstar Asia Holdings Pty Limited[26] (86 108 623 123)
The principal activities during the period were that of an investment holding company.

Jetstar Group Pty Limited[26] (64 003 901 353)
The principal activities during the period were to provide cabin crew services.

Jetstar International Group Australia Pty Limited[26] (17 152 774 395)
The principal activities during the period were that of an investment holding company.

Jetstar Services Pty Limited[26] (19 107 638 326)
The principal activities during the period were to provide airline ground services.

National Jet Operations Services Pty Ltd[25] (33 055 887 575)
The principal activities during the period were to provide cabin crew services.

National Jet Systems Pty Ltd[26] (11 008 279 203)
The principal activities during the period were to provide passenger air transportation services.

Network Aviation Holdings Pty Ltd[26] (081 505 008)
The principal activities during the period were that of a non-operative holding company.

Network Aviation Pty Ltd[25] (082 007 350)
The principal activities during the period were to provide passenger air transportation services.

Network Holding Investments Pty Ltd[26] (110 179 818)
The principal activities during the period were that of a non-operative holding company.

Network Turbine Solutions Pty Ltd[26] (20 110 180 008)
The principal activities during the period were maintenance of Fokker F100 and Airbus A320 aircraft.

Osnet Jets Pty Ltd[26] (99 128 559 419)
The principal activities during the period were that of a dormant non-operative company.

Phone a Flight Pty Ltd[26] (41 608 735 664)
The principal activities during the period were that of a dormant non-operative company.

Q H Tours Ltd[26] (81 001 262 433)
The principal activities during the period were that of an investment holding company.

Qantas Airways Domestic Pty Limited[26] (52 123 140 152)
The principal activities during the period were that of an Air Operator Certificate holding company.

Qantas Asia Investment Company Pty Ltd[26] (26 125 048 044)
The principal activities during the period were that of an investment holding company.

Qantas Climate Fund Investment 1 Pty Ltd[26] (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.

Qantas Climate Fund Investment 2 Pty Ltd[26] (90 686 283 670)
The principal activities during the period were that of an investment company.

Qantas Courier Limited[26] (32 003 890 328)
The principal activities during the period were to provide domestic freight services within New Zealand.

Qantas Domestic Pty Limited[26] (21 134 556 255)
The principal activities during the period were to provide cabin crew services.

Qantas Freight Enterprises Limited[25] (55 128 862 108)
The principal activities during the period were that of a non-operative holding company.

Qantas Freight Terminals Pty Limited[26] (29 676 695 453)
The principal activities during the period were to hold the Qantas Freight terminal leases.

Qantas Frequent Flyer Limited[26] (12 129 456 908)
The principal activities during the period were that of a non-operative holding company.

Qantas Frequent Flyer Operations Pty Limited[25] (22 132 484 210)
The principal activities during the period were operation of the Qantas Wine business.

Qantas Ground Services Pty Limited[26] (43 137 771 692)
The principal activities during the period were to provide airline ground services.

Qantas Group Accommodation Pty Ltd[25] (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.

Qantas Group Flight Training (Australia) Pty Limited[26] (45 128 258 677)
The principal activities during the period were to provide flight training services.

Qantas Group Flight Training Pty Limited[25] (29 128 258 104)
The principal activities during the period were to provide flight training services.

Qantas Information Technology Ltd[26] (99 000 005 372)
The principal activities during the period were to provide information technology services.

Qantas Road Express Pty Limited[26] (56 130 392 111)
The principal activities during the period were to provide road transportation services carrying international air cargo.

Qantas SAFFA Pty Limited[26] (68 674 117 349)
The principal activities during the period were to invest into the Sustainable Aviation Fuel Financing Alliance fund established by Airbus.

Qantas Superannuation Limited[26] (47 003 806 960)
The principal activities during the period were that of acting solely as a trustee of a regulated superannuation fund until 29 March 2025.[27]

Qantas Ventures Pty Limited[26] (55 622 616 611)
The principal activities during the period were that of an investment holding company.

Qantas Wheatbelt Connect Pty Limited[26] (86 666 462 504)
The principal activities during the period were that of an investment vehicle.

QF Cabin Crew Australia Pty Limited[25] (46 128 382 105)
The principal activities during the period were to provide cabin crew services.

QF A332 Leasing 1 Pty Limited[26] (11 100 511 813)
The principal activities during the period were to that of an aircraft leasing company.

QF A332 Leasing 2 Pty Limited[26] (13 100 511 886)
The principal activities during the period were to that of an aircraft leasing company.

QF BOC 2008-1 Pty Limited[26] (22 100 510 674)
The principal activities during the period were to that of an aircraft leasing company.

QF BOC 2008-2 Pty Limited[26] (35 100 510 727)
The principal activities during the period were to that of an aircraft leasing company.

QF Dash 8 Leasing No. 4 Pty Limited[26] (91 135 258 445)
The principal activities during the period were to that of an aircraft leasing company.

QF Dash 8 Leasing No. 5 Pty Limited[26] (31 149 204 713)
The principal activities during the period were to that of an aircraft leasing company.

QF Dash 8 Leasing No. 6 Pty Limited[26] (35 164 390 238)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA 2008-1 Pty Limited[26] (71 133 356 475)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA 2008-2 Pty Limited[26] (73 133 356 420)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA A380 2010 No.1 Pty Limited[26] (14 145 079 312)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA A380 2010 No.2 Pty Limited[26] (78 145 079 205)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA A380 2010 No.3 Pty Limited[26] (61 145 079 134)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA A380 2010 No.4 Pty Limited[26] (42 145 079 054)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA A380 2011 No.1 Pty Limited[26] (11 145 078 931)
The principal activities during the period were to that of an aircraft leasing company.

QF ECA A380 2011 No.2 Pty Limited[26] (19 146 437 774)
The principal activities during the period were to that of an aircraft leasing company.

QF EXIM B787 No.1 Pty Limited[26] (53 166 786 321)
The principal activities during the period were to that of an aircraft leasing company.

QF EXIM B787 No.2 Pty Limited[26] (49 166 786 367)
The principal activities during the period were to that of an aircraft leasing company.

QGHC 1 Pty Limited[26] (34 687 449 467)
The principal activities during the period were that of dormant non-operative company.

Regional Airlines Charter Pty Limited[25] (21 147 543 806)
The principal activities during the period were to provide passenger air transportation services.

Sunstate Airlines (Qld) Pty Limited[25] (82 009 734 703)
The principal activities during the period were to provide passenger air transportation services.

TAD Holdco Pty Ltd[25] (90 637 674 376)
The principal activities during the period were that of a non-operative holding company.

Taylor Fry Holdings Pty Limited[26] (63 604 441 483)
The principal activities during the period were that of an investment holding company.

Taylor Fry Pty Limited[26] (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.

Trip a Deal Holdings Pty Ltd[26] (97 617 898 263)
The principal activities during the period were that of a non-operative holding company.

Trip a Deal Pty Ltd[25] (50 149 240 433)
The principal activities during the period were providing online travel agent services, specialising in tour based packages.

VII Pty Limited[26] (83 619 963 263)
The principal activities during the period were that of an IT Service Provider for gift cards.

24 None of these entities are reporting entities for the purposes of the Canadian Supply Chains Act but have been included in this list for the purposes of transparency.

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

26 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.

27 On 29 March 2025, the Qantas Group Superannuation Plan (**QGSP**) completed its merger with Australian Retirement Trust (**ART**), one of Australia's largest superannuation funds. The Trustee of QGSP transferred from Qantas Superannuation Limited ("Qantas Super") to Australian Retirement Trust Pty Ltd (the "Trustee") via a Successor Fund Transfer.