



# SCENIC GROUP

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*Modern Slavery Statement 2024*



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## Message from Founder & Chairman

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At Scenic Group, we believe that true luxury extends beyond exceptional service and unforgettable experiences, it is also defined by integrity, responsibility, and respect for human dignity.

This is our first Modern Slavery Statement, and it marks an important step in formally acknowledging our responsibility to help prevent modern slavery and human trafficking in all parts of our business and supply chains.

While we are still early in this journey, we understand the seriousness and global nature of modern slavery risks. We are committed to building a strong and transparent approach that aligns with our values and ensures that the people who contribute to our operations, whether directly or indirectly, are treated with dignity and respect.

We have taken initial steps to better understand the structure of our operations and supply chain, assess areas of potential risk, and identify priority actions.

We know that meaningful progress takes time, and we are committed to continuous improvement. This statement sets out where we are now, the actions we've started, and how we plan to strengthen our approach moving forward.

As we look to the future, we are determined to play our part in contributing to a more ethical and sustainable cruise industry, one that protects people as well as the places we visit.

*Glen Moroney*

FOUNDER & CHAIRMAN, SCENIC GROUP

# About this statement

**At Scenic Group we oppose modern slavery practices and, consistent with our values, are committed to identifying and managing the risk of modern slavery occurring throughout our supply chains and operations.**

Scenic Group operates in four jurisdictions where modern slavery reporting thresholds have been triggered, including Australia, Canada, Switzerland and the United Kingdom.

As such we have created a joint statement. Entities covered by this statement include Scenic Tours Pty Ltd, Islington Investment Group, ST Touring Canada Ltd, Scenic Leisure Holdings AG, Scenic Ship Services AG, Scenic Tours Europ AG and Scenic Tours (UK) Ltd.

## Canada

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023* requires entities operating in Canada to report annually if they meet all three of the following thresholds: more than 250 employees, annual revenue of at least CAD \$40 million, and total assets of at least CAD \$20 million. Reporting must address the risks of modern slavery in their operations and supply chains, as well as the actions taken to mitigate those risks.

## Switzerland

Under the *Swiss Code of Obligations* (Articles 964a–964l), entities are required to produce a non-financial report, including disclosures on human rights (such as forced and child labour), if they meet at least two of the following thresholds for two consecutive years: a balance sheet total of CHF 20 million, revenue of CHF 40 million, and 250 or more full-time employees

## United Kingdom

The *Modern Slavery Act 2015* mandates that entities with an annual turnover of £36 million or more prepare and publish a modern slavery statement each year.

## Australia

Under the *Modern Slavery Act 2018* (Cth), entities that carry on business in Australia and have a consolidated annual revenue of at least AUD \$100 million are required to publish an annual modern slavery statement.



# About this statement

The Statement describes our approach to identifying, assessing, mitigating and responding to the risk of modern slavery in our supply chains and operations for the financial year commencing 01 Jan 2024 and ending 31 December 2024 (Reporting Period).

All data and figures quoted in this Statement are current as of 31 December 2024, unless stated otherwise. This report has been prepared in consultation with key personnel representing each reporting entity covered by the statement. Consultation involved engaging with relevant representatives to review supply chain activities and evaluate the policies, procedures, and plans in place to manage modern slavery risks.

This Statement includes the mandatory reporting criteria specified in Section 16 of the Modern Slavery Act 2018 (Cth) (AU). The content has been prepared with the intention of also meeting relevant modern slavery reporting requirements in other jurisdictions, where applicable.

A copy of our latest Sustainability Impact Report is also available for download from the Scenic Group website.

This criterion is referenced in the reporting index below:

Clause	Reporting Criteria	Statement Section	Page #
16(a)	Identify the reporting entity	About this Statement	4
16(b)	Describe the structure, operations and supply chains of the reporting entity	About Scenic Group	6-7
16(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Identifying, assessing & addressing modern slavery risk	8-10
16(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Mitigating modern slavery risk	11-13
16(e)	Describe the process of consultation with: i. any entities that the reporting entity owns or controls in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	About this Statement	5
16(f)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Other relevant information	14
14 (2) (d) (ii)	Is approved by the principal governing body of an entity (the higher entity) which is in a position, directly or indirectly, to influence or control each reporting entity covered by the statement, whether or not the higher entity is itself covered by the statement;	Approval of Statement	14
14 (2) (e) (ii)	is signed by a responsible member of if subparagraph (d)(ii) applies—the higher entity	Approval of Statement	14



## About Scenic Group

At Scenic Group we understand our operations have the potential to cause, contribute or be directly linked to modern slavery. We acknowledge the role and responsibility we have in generating awareness and implementing steps to uphold human rights and minimise the risk of modern slavery practices occurring in our operations and supply chains.

### Our structure

Scenic sells cruises via its affiliated companies based in Australia, US, Canada, UK, Singapore and Germany and it has its cruise operating teams employed by affiliates based in Switzerland and Croatia.

The ultimate beneficiary owner is Mr Glendon Mark Moroney, he also sits on the Board of Directors together with another two non-executive directors.

The Board has delegated authority to conduct the day-to-day business to the Executive Committee which is comprised of the Chief Operating Officer, Chief Financial Officer and Chief Information Officer

### Our Operations

Established in 1986, we are a proudly Australian-founded company, taking our guests to the most fascinating destinations in over 60 countries and every continent.

As a leading luxury cruise line and tour operator we provide three distinct types of guest experiences, globally over ocean, land and rivers.

With a fleet of four ocean vessels, twenty river vessels and partnerships with hotels and tour operators, our handcrafted and luxury land journeys take guests to Australia, New Zealand, Canada, Africa, Japan, Korea, Europe, Egypt and the Middle East.

# Our supply chains

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To deliver exceptional experiences to our guests, we rely on a diverse, multi-layered, and carefully managed global supply chain.

From locally sourced gourmet ingredients and premium linens to technical services, fuel procurement, and staff uniforms, we work with a wide range of suppliers and service providers across multiple countries.



Our supply chain includes the shipbuilding yards where our vessels are brought to life. Each ship is purpose-built, combining state-of-the-art technologies and world-class craftsmanship to meet exacting standards of comfort, elegance, and performance.

The design and construction of our fleet involves partnerships with subcontractors, equipment manufacturers, and specialist tradespeople across regions.

We work closely with a network of trusted partners across the broader travel and tourism ecosystem, including airlines, tour operators, and accommodation providers to deliver seamless, end-to-end journeys for our guests.

At the heart of our operations is our dedicated and diverse workforce. This includes our permanent crew, onshore teams, and seasonal workers who are integral to supporting peak travel periods and providing the high-touch service our guests expect.

We recognise the heightened risks that can exist for seasonal and contract workers and are committed to upholding fair employment practices across all employment types.

# Identifying modern slavery risk

As a luxury global cruise operating company, we recognise that there can be significant modern slavery exposures within our supply chains due to the complexity and global nature of our operations.

With a strong understanding of our operations and supply chain, we recognise that potential modern slavery exposures may arise at various levels, including Tier 1 suppliers (those we contract with directly), as well as deeper within the supply chain at Tier 2 and Tier 3 levels.

These potential risks and exposures, along with examples of where they may occur, are summarised below.

- ➡ **Recruitment and manning agencies** (Tier 1 suppliers): In countries with weaker labour protections, the use of third-party agencies can lead to exploitative recruitment practices, including the charging of recruitment fees, withholding of passports or employment contracts, and inadequate working and living conditions for crew members on board.
- ➡ **Shipbuilding and refurbishment** (Tier 1 and Tier 2 suppliers): There is a risk of forced labour and unsafe working conditions in shipyards, particularly in high-risk countries. Complex subcontracting arrangements and extended value chains can further reduce visibility and accountability.
- ➡ **Onboard services and hospitality roles** (Tier 1 and 2 suppliers): Lower-wage workers involved in roles such as housekeeping, catering, and cleaning may face long hours, threats of job loss or deportation, and exploitative contract terms — particularly where recruitment is done through third parties in high-risk regions.
- ➡ **Goods and consumables procurement** (Tier 2 and Tier 3 suppliers): Supply chains for food and beverage products, especially in sectors such as seafood and agriculture, are known to carry high modern slavery risks. Textiles used for uniforms and linen, often sourced from Tier 2 suppliers in countries with limited labour oversight, and retail merchandise, may also involve exploitative labour practices.





# Our Employees

The seasonality of employment at Scenic Group reflects the unique nature of our operations across land and sea. We engage recruitment and manning agencies for the employment of our crew. Our crew members, working on board vessels, are typically employed on a seasonal or contract basis aligned with the operational schedules of our river and ocean journeys. Our ocean vessels operate globally and our river vessels across Europe and Asia.

In contrast, our corporate office employees are engaged in ongoing, year-round roles that provide continuity across essential business functions such as planning, sales, marketing, finance, and sustainability. During 2024, our office locations included Australia, Cambodia, Canada, Croatia, Fiji, Malta, New Zealand, Philippines, Switzerland, United Kingdom, USA, and Vietnam.

Across the Scenic Group in 2024 we had ~2431\* employees supporting our operations.

\*At the time of this report total employee figures were not available for two of our operational entities.



# Our supply chains

Our supply chains are globally distributed. A review of our total spend for the 2024 calendar year shows that the highest expenditure areas were directly related to the tours we operate, provisioning for our vessels and hotel and catering services for our onboard operations.

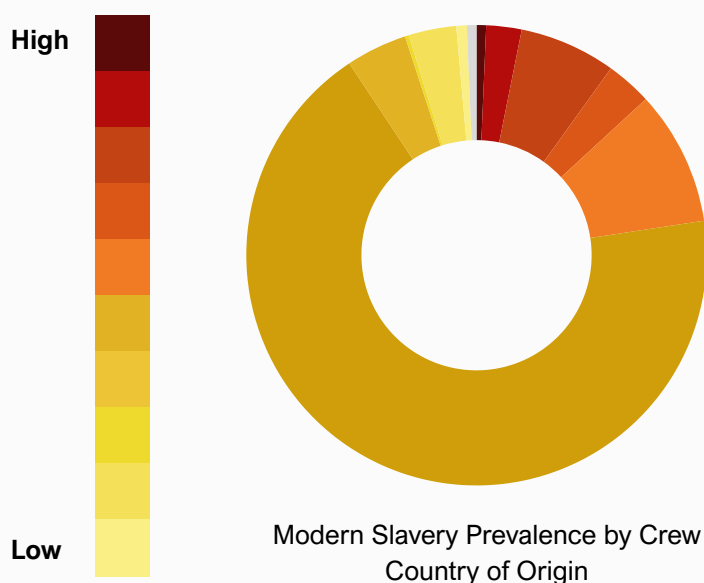
Also featuring among the top ten spend categories were general overheads not directly tied to tours, as well as marketing and advertising. Other significant operating costs incurred included fuel, vessel repairs and maintenance, and the procurement of goods and services for our shipbuilding division.

When aligning these spend areas with the Global Industry Classification (GICs) sectors, we identified nine sectors that are relevant to our highest areas of expenditure.

Relevant GICs sectors for 2024 expenditure
10 Energy
15 Materials
20 Industrials
25 Consumer Discretionary
30 Consumer Staples
40 Financials
45 Information Technology
50 Communication Services
55 Utilities

# Assessing modern slavery risk

An initial assessment of the countries of origin for a sample of our vessel crew has been conducted using the Global Slavery Index, which measures modern slavery prevalence based on the number of people affected per 1,000 population. This assessment covered a sample of 1,491 crew members.



While most of our crew come from countries with a low to medium prevalence of modern slavery, we acknowledge that a smaller proportion originate from regions where the risk is higher. Despite the elevated country-of-origin risk, we engage reputable recruitment and manning agencies to help ensure that all crew are treated fairly and in accordance with international standards.

To further assess and manage modern slavery risks, we currently conduct physical annual audits of our manning agencies to verify their compliance with the requirements of the Maritime Labour Convention (MLC).

We have also assessed our office locations against the Global Slavery Index. One office is located in a region with a medium prevalence of modern slavery (7.8), while the remaining locations are situated in regions with relatively low prevalence rates, ranging from 0.6 to 5.2.

We have undertaken preliminary work to align our spend categories with the relevant GICS sectors and to identify high-risk areas within our supply chain where forced or child labour may potentially occur. At a broad level, each of these sectors presents a risk of modern slavery in certain regions of the world. However, we have not yet conducted detailed screening of specific industry types or countries of origin across our supplier base.

Looking ahead, we are committed to deepening our analysis to more accurately assess modern slavery risk, this will include a more granular review of individual suppliers, the nature of their industries, and the countries in which they operate.

Key Policies	
Code of Conduct	Sets out clear expectations for all business activities and interactions with employees, guests, suppliers, and other stakeholders
Remuneration Policy	Outlines that Scenic Group is an equal opportunity employer and that it complies with all employment statutes, laws and regulations. Confirms that all employees at Scenic Group must be provided with a written contract and that this contract complies with local jurisdictional requirements.
Discrimination, Harassment and Bullying in the Workplace	Outlines measures aimed at eliminating discrimination, harassment and bullying in the workplace as well as including avenues for raising issues.
Sustainable Procurement Guidelines	Developed to address key procurement streams associated with our operations and outline expectations related to minimising environmental impacts, ensuring social responsibility whilst selecting options that provide value for money
Equality, Diversity & Inclusion Policy	Outlines the commitments to encourage diversity, equality and inclusion and eliminate discrimination from the workplace.
Work Health and Safety Statement of Commitment	Outlines the objectives and commitments in place to support the safety and wellbeing of workers and those affected by Scenic Groups works.
Onboard Complaints Procedure	The procedure has been developed in accordance with MLC 2006 and relevant Flag State requirements. It applies to all seafarers working on our vessels and outlines the procedure for raising and responding to complaints. The policy is displayed on crew notice boards throughout the ship and is covered during onboard inductions when crew members join the vessel.

## Mitigating modern slavery risk

As a global organisation, we operate across a range of regions with varying regulatory requirements related to human rights and modern slavery.

At Scenic Group, integrity, responsibility, and ethical business practices are at the core of how we operate. Our commitment to these principles is embedded in the Scenic Group Code of Conduct, which sets out clear expectations for all business activities and interactions with employees, guests, suppliers, and other stakeholders.

The Code applies to everyone representing Scenic Group, including employees, contractors, and consultants, regardless of their role or employment status. All Scenic Group employees have access to our Code of Conduct through our centralised system, with core guest facing employee groups required to complete an onboarding process that includes an introduction to the Scenic Group Code of Conduct as well as other key corporate policies.

Beyond our Code of Conduct, we have a comprehensive suite of policies and procedures in place to support our commitment to ethical conduct and respecting human rights.

# Key mitigation measures - our employees

We are committed to providing a safe and compliant working environment for our workforce across all jurisdictions, ensuring adherence to applicable labour laws and the protection of human rights.

Our workforce is supported through both recruitment agencies for our landside and river operations and specifically manning agencies for our ocean operations.

The MLC sets modern standards for seafarers' working and living conditions. It covers 5 main subject areas referred to as titles

Title 1: Minimum requirements for seafarers to work on vessels

Title 2: Conditions of employment

Title 3: Accommodation, recreational facilities, food and catering

Title 4: Health protection, medical care, welfare and social security protection

Title 5: Compliance and enforcement

For manning agencies, the MLC imposes significant responsibilities to ensure the well-being and fair treatment of the seafarers they place.

Key human rights related responsibilities of Manning Agencies under MLC include:



**No Recruitment Fees:** Seafarers must not be charged recruitment fees.

**Licensed Agencies:** Manning agencies must be licensed or regulated by the appropriate authority in their country of operation.

**MLC Compliance:** Agencies must ensure the shipowners they supply to also comply with Maritime Labour Convention (MLC) standards.

**Seafarer Employment Agreements (SEAs):**

- Must be clear, enforceable, and reflect fair working and living conditions.
- Seafarers must have the opportunity to review and seek advice before signing.
- Agreements must be entered into voluntarily, with full understanding of rights and responsibilities.
- All required terms must be included (e.g. wages, hours, leave, repatriation, social security).

**Financial Protection:** Agencies may be required to have systems (e.g. insurance) to compensate seafarers in cases of abandonment or contract breaches.

**Complaints Procedures:** Seafarers must be informed of and have access to onboard and shore-based complaints processes, without fear of retaliation.

**No Child or Forced Labour:** Employment of anyone under 16 is prohibited, and all forms of forced labour are strictly banned.



With respect to our manning agencies, we conduct annual audits to assess their practices and ensure compliance with relevant MLC standards. Additionally, the agencies we engage are government-approved, as they operate in countries that have ratified the MLC and International Labour Organisation (ILO) standards.

For recruitment agencies that supply our river crew, we include specific clauses in our agreements to ensure that no additional fees are charged to workers.

We have established mechanisms across all vessel operations to enable crew members to raise concerns or report grievances.

Clear communication channels are outlined and made accessible to all crew via our onboard library, displayed on crew notice boards throughout the vessel, and covered during induction sessions when crew join.

In addition, independent reporting lines are available to support crew who may wish to raise concerns outside of the ship's management structure.

For our ocean vessels our Onboard Complaints Procedure has been developed in accordance with MLC 2006 and relevant Flag State requirements. It applies to all seafarers working on our vessels and outlines the procedure for raising and responding to complaints.



## Key mitigation measures - our supply chains

Beyond working with our recruitment and manning agencies, we have commenced steps to integrate clauses in some of our contracts that reflect our commitment to respecting human rights across our supply chain.

We acknowledge and recognise the need to go further. We are now focused on strengthening this approach by developing and incorporating dedicated clauses that specifically address the management of modern slavery risks by our suppliers.

We currently offer a voluntary process for suppliers to share information about their sustainability practices, including human rights. To strengthen our oversight of modern slavery risks, we are committed to enhancing supply chain transparency through targeted screening of individual suppliers and engaging directly with those identified as higher risk.

## Other relevant information

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We remain committed to continuously strengthening our approach to identifying and managing modern slavery risks within our supply chains. As part of this commitment, we aim to engage more proactively with our suppliers to better understand how they are embedding responsible and ethical business practices within their own operations and broader supply networks.

- ➡ Finalising and implementing an Anti-Slavery Policy and a Responsible Sourcing and Procurement Policy
- ➡ Enhancing whistleblower protection provisions within our policy framework
- ➡ Conducting modern slavery risk screening of individual suppliers, including assessment of their industry and country of operation
- ➡ Establishing processes to guide supplier engagement where elevated risk ratings are identified
- ➡ Developing and incorporating contract clauses that specifically address the management of modern slavery risks by suppliers
- ➡ Delivering targeted training and awareness programs for key personnel

## Approval of Statement

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This is Scenic Groups' Modern Slavery Statement for its FY24 reporting period, and approval is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth).

The Statement has been approved by the Board of Directors of Scenic Group and signed by our Chief Operating Officer as the responsible member representative of Scenic Group.



Damien Thomas  
**Chief Operating Officer**  
Scenic Group



## Further information

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The Scenic Group website provides a range of information on our operations and our sustainability framework and associated impact reports [www.scenic.com.au](http://www.scenic.com.au)

Requests for further information and our approach to modern slavery risk, may be directed to:

Phil Jordan  
**Director of Sustainability and Delivery**

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