



SHANGRI-LA

Shangri-La Investments (Australia) Pty Limited

(ABN 15 146 016 033)

Lilyvale Hotel Pty Ltd

(ABN 92 003 643 963)

Shangri-La Joint Modern Slavery Statement

Legislation: *Modern Slavery Act 2018* (Cth) (Modern Slavery Act)

Reporting Year: 3

Reporting Period: 1 January 2024 – 31 December 2024 (FY 2024)



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Foreword from our Directors

This joint modern slavery statement (**Joint Statement**) covers the reporting period from 1 January 2024 – 31 December 2024 (**FY24**) for all Shangri-la companies operating and carrying out business in Australia, who are required to publish a modern slavery statement under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**), (collectively referred to as **Australian Shangri-La Reporting Entities, we, our or us**),

The Australian Shangri-La Reporting Entities that this Joint Statement covers is:

- Shangri-La Investments (Australia) Pty Limited (**Shangri-La Australia**), which is a leading business in the luxury hotel, accommodation and hospitality space, operating two hotels in Australia, in Sydney and Cairns; and
- Lilyvale Hotel Pty Ltd (**Lilyvale**), a subsidiary company of Shangri-La Australia, that owns Shangri-La Sydney.

Shangri-La Australia and Lilyvale form part of the global Shangri-La Group, which owns and/or operates over 100 luxury hotels and resorts in over 75 destinations in Africa, Asia, Europe, the Middle East, North America and Australia, and with 42,000+ employees globally (**Shangri-La Group**).

This is Shangri-La Australia's third Modern Slavery Statement. This year, this statement also covers a new reporting entity, Lilyvale. This is the Australian Shangri-La Reporting Entities first joint statement.

While this Joint Statement covers the Australian Shangri-La Reporting Entities, the Shangri-La Group's global values, policies and procedures continue to inform our response to addressing the complex issue of modern slavery in our operations and supply chains in Australia.

We acknowledge that modern slavery and human trafficking is a global and complex challenge. This is especially true in relation to the hospitality industry we operate in, which has very large and complex supply chains compared to other sectors. Our core values include ethical business conduct, integrity and respect – addressing modern slavery risks in our operations and supply chains is important to ensure we are living up to our values.

The Shangri-La Group conducts its business globally with respect to its Global Code of Conduct and Ethics and Human Rights Policy, which underpins every aspect of our business. We value honesty and care in all our relationships and remain deeply committed to our social responsibility by making a positive contribution to our communities, environment, colleagues, guests and business partners.

Our Joint Statement under the Modern Slavery Act **outlines the key steps we have implemented** at a global and local level to identify modern slavery risks and to assess and address these risks. Key steps and progress we have undertaken in FY24 include:

- **Anti-Modern Slavery Policy:** the introduction of the Shangri-La Australia Anti-Modern Slavery Policy, which applies to all persons working for Shangri-La Australia and its subsidiaries, including Lilyvale, to assist us to monitor high risk suppliers, mitigate risk and set out our expectations regards modern slavery risks and reporting on modern slavery incidents;
- **Global Training:** the implementation of a compulsory training module on modern slavery and human rights risks that is bespoke and specific to the hotel industry and the Shangri-La Group which has been rolled out globally and locally;
- **Human Rights Due Diligence:** Shangri-La Group has begun work with an external human rights expert to establish a comprehensive, group-level human rights due diligence assessment to better understand the potential and actual human rights risks associated with our operations, products and services;



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- **Risk Monitoring:** Shangri-La Group has improved its risk monitoring processes to cover international indices that include topics such as human rights. It also continued to conduct risk assessments of 100 of its largest suppliers which make up 27% of the Shangri-La Group's procurement spend.

The Shangri-La Group's global approach will continue to inform our emerging response to assessing and addressing modern slavery risks in our operations and supply chains, as the Australian Shangri-La Reporting Entities look to take a continuous improvement and risk-based prioritised approach in following reporting years.

We look forward to reporting on our progress in future statements.

Principal Governing Body Approval

This Joint Statement has been approved by the board of Shangri-La Investments (Australia) Pty Limited on behalf of each of Shangri-La Investments (Australia) Pty Limited and Lilyvale Hotel Pty Ltd, as the parent company of Lilyvale Hotel Pty Ltd, in accordance with section 14 of the Modern Slavery Act 2018 (Cth) on 30/06/2025

Signature of Responsible Member

This Joint Statement is signed by Michael Cottan in his role as Director of Shangri-La Investments (Australia) Pty Limited as the responsible member of Shangri-La Investments (Australia) Pty Limited in accordance with section 14 of the Modern Slavery Act 2018 (Cth).

Michael Cottan

Director

Shangri-La Investments (Australia) Pty Limited

Date: 30/06/2025



1. Criterion 1: Identify the reporting entity

- 1.1 The reporting entities under the Modern Slavery Act are:
- 1.1.1 Shangri-La Investments (Australia) Pty Limited (ABN 15 146 016 033), with its registered office at Level 38, Tower Three, International Towers Sydney, 300 Barangaroo Avenue, Sydney 2000, Australia; and
 - 1.1.2 Lilyvale Hotel Pty Ltd (ABN 92 003 643 963), with its registered office at 176 Cumberland St, The Rocks, NSW, 2000, Australia.
- 1.2 The Shangri-La Australia Reporting Entities make this Joint Statement in accordance with section 14 of the Modern Slavery Act. This Joint Statement is submitted and published for the FY24 Reporting Period.
- 1.3 Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities (**Commonwealth Guidance**) and the Modern Slavery Act Supplementary Guidance (**Supplementary Guidance**) to help inform and guide our approach.
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2. Criterion 2: Describe the reporting entity's structure, operations and supply chains

2.1 Our Structure

- 2.1.1 Shangri-La Australia and Lilyvale are Australian proprietary companies limited by shares and are incorporated in Australia.
- 2.1.2 Shangri-La Australia is the parent company of Lilyvale (which owns Shangri-La Sydney) and Shangri-La Hotel (Cairns) Pty Ltd (which owns Shangri-La The Marina, Cairns). Shangri-La Australia is also the holding company for Shangri-La Hotels Pty Ltd, however this entity provides management and marketing services, but does not have any employees on its payroll.
- 2.1.3 Across Sydney and Cairns, Shangri-La Australia has a staff headcount of approximately 670 staff.
- 2.1.4 Lilyvale does not hold or control any subsidiary companies. Lilyvale has an approximate staff headcount of 494.
- 2.1.5 Shangri-La Australia and Lilyvale are part of the global Shangri-La Group, which owns and/or manages over 100 hotels globally under the Shangri-La, Kerry Hotel, JEN by Shangri-La and Traders Hotel brands.
- 2.1.6 The parent company for Shangri-La Australia is Shangri-La Asia Ltd founded in 1971 and headquartered in Hong Kong.

2.2 Our Operations

- 2.2.1 As per the Commonwealth Guidance, 'operations' refers to activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas.
- 2.2.2 Shangri-La Australia operates two hotels in Australia: Shangri-La Sydney (which is owned by Lilyvale) and Shangri-La The Marina, Cairns. Our main operations include the provision of hotel accommodation and related services; food and beverage and catering facilities and services; concierge and valet parking services;



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leasing of office and commercial spaces; spa and wellness services and activities; and hotel management services.

- 2.2.3 As part of our operations, we run a variety of restaurant, spa and retail services. These are included in the table below:

Service name	Service type	Location
Altitude Restaurant	Food and beverage	Sydney
Café Mix	Food and beverage	Sydney
Blu Bar on 36	Food and beverage	Sydney
Harts Pub	Food and beverage	Sydney
Chi, The Spa at Shangri-La	Spa/ wellness	Sydney
Shangri-La Health Club	Wellness	Sydney
The Bradfield Lounge	Entertainment/ recreation	Sydney
Lobby Lounge	Food, beverage and tobacco	Sydney
Pier Shopping	Retail	Cairns
The Backyard	Food and beverage	Cairns
Pool Bar	Food and beverage	Cairns

- 2.2.4 As of current, we have a headcount of approximately 652 staff. Our full-time staff make-up about 50% of our workforce and the rest are part-time and casual-workers.

2.3 Our Supply Chains

- 2.3.1 Our supply chain is very large and complex and we have a wide range of suppliers who are located in Australia and overseas.
- 2.3.2 Before becoming a supplier for an Australian Shangri-La Reporting Entity, a business needs to read and agree to be bound by our Global Supplier Code of Conduct before we can enter the supplier's details into our portal for registration and qualification.
- 2.3.3 We also note that a number of our suppliers are themselves reporting entities under the Modern Slavery Act, including Challenger Services Group, one of our cleaning suppliers in Sydney.
- 2.3.4 Shangri-La Australia have mapped out our supply chains at a high level as set out in the following table:

No.	Product / Service category	Key themes
<i>Key direct suppliers used in relation to core product and service offerings</i>		

No.	Product / Service category	Key themes
1.	Food	<ul style="list-style-type: none"> ▪ As a business that operates in the luxury hotel and hospitality space, we procure a wide range of products and services such as food and beverage products, cleaning services, linen and bedding, labour supply, computer hardware and equipment maintenance and repair. ▪ Our cleaning services includes: <ul style="list-style-type: none"> ○ laundry services; ○ house-keeping services – some of these are done in-house and others are supplied by third-parties; ○ general cleaning of public spaces – these services are supplied by a third party. We contract with a different supplier for night cleaning of public spaces; ○ dish cleaning – these services are supplied by a third party. ▪ Each of our cleaning suppliers are contracted with for no more than 3 years at a time. ▪ These supplied products and services support our key offerings to our guests and visitors (see section 2.2 above). ▪ Some of our suppliers are located overseas, including in China, South East Asia, Europe, and the US.
2.	Beverage	
3.	Bedding / linen	
4.	Cleaning services	
5.	Labour supply other than cleaning (security, massage services, restaurant workforce).	
6.	Televisions	
7.	Guest Supplies	
8.	Computer hardware	
9.	Equipment repair/ maintenance	
10.	Laundry services	
11.	Furniture	
12.	Water	
Indirect Suppliers		
13.	Office Supplies	

No.	Product / Service category	Key themes
14.	IT Services/ support	<ul style="list-style-type: none"> To support our key product and service offerings, we engage a range of other suppliers who supply goods or services that are not integrated or used in our luxury hotel and hospitality operations.
15.	Professional services (i.e. Marketing, Legal)	<ul style="list-style-type: none"> These are suppliers from whom we purchase goods and services relating to, for example, office supplies, professional services and more.

3. Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.

3.1 In this section we identify the 'risks of modern slavery practices', meaning the potential for the Australian Shangri-La Reporting Entities to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.

3.2 In this context, 'risk' means to people, rather than the risks to the Australian Shangri-La Reporting Entities (such as reputational or financial damage).

3.3. Although the Australian Shangri-La Reporting Entities together with the broader Shangri-La Group take business ethics very seriously, Shangri-La Australia is in the first few years of its formal modern slavery journey under the Modern Slavery Act and this is Lilyvale's first reporting period.

3.3 Our priorities

3.3.1 Based on the high level risk mapping exercise Shangri-La Australia undertook in FY23 (provided at 3.4 below), it intends to take a prioritised risk based approach to its efforts as recommended by the Commonwealth Guidance.

3.3.2 In the next few reporting periods Shangri-La Australia will continue to focus its efforts on the following key areas which it identified as having higher risks and where it has the most leverage:

- key direct suppliers who provide higher risk labour services including cleaning services (e.g. housekeeping, laundry, dish cleaning), security services, massage services and restaurant services (e.g. waiters, cooks, etc); and
- assessing and mapping our industry and sector risks, to better understand the risks in our operations and supply chains.

3.3.3 Although this is the first year that Lilyvale has met the reporting threshold period, as its parent company Shangri-La Australia has been a reporting entity for some time, the risks Shangri-La Australia has identified as part of its risk assessment of its operations and supply chains are also directly relevant to Lilyvale as Shangri-La



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has considered and documented the risks of modern slavery of Lilyvale's operations and supply chains.

3.4 High level risk mapping exercise of our suppliers

- 3.4.1 In accordance with the Commonwealth Guidance and known modern slavery indicators, in FY23 Shangri-La Australia undertook a high level risk mapping exercise of its operations and supply chains which also covers the operations and supply chains of its subsidiaries, such as Lilyvale. A summary of this risk assessment is set out in the table below.
- 3.4.2 Shangri-La Australia continue to monitor our risk environment and take steps to assess and address, and to mitigate identified risks through a variety of global and local policies and procedures including: audits, pre-qualification screenings of suppliers and staff training and development. These policies and procedures also apply to its subsidiaries. More information on the actions we take to assess and address these risks is set out at section 4 below.

Category of modern slavery risk indicators	Explanation	Risk assessment
Sector and industry risks	We acknowledge that the hospitality and hotel industry has been identified by a number of civil society groups as a higher risk industry.	<p>We acknowledge that we operate in a higher risk industry being the hospitality and hotel sector.</p> <p>We use several suppliers in respect of food and beverage products, cleaning services and maintenance services. We have processes in place to monitor that workers contracted at our hotels are allowed to work in Australia and are treated in accordance with relevant laws. One example is an audit of our contractors as described at 4.3 below.</p> <p>We aim to mitigate this risk through a variety of Global and local policies and procedures including (but not limited to) our Global Supplier Code of Conduct (which our suppliers are required to sign), contractual obligations to abide by relevant laws/ regulations and an audit of our contractors, as described in section 4.3 below.</p>
Product and service risks	Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.	<p>We have identified labour supply services as higher risk products and services.</p> <p>In particular, in line with Commonwealth Guidance, we consider that cleaning services are of particular high risk. We</p>



	<p>Labour exploitation in the cleaning industry is well-documented, and cleaning services have been identified by the Government as a key risk area for modern slavery in Australia.</p> <p>Similarly, other labour supply workforces such as security, massage and restaurant labourers are at higher risk of forced labour and exploitation. We consider that these workforces are inherently higher risk due to their temporary, seasonal and lower-skilled characteristics.</p> <p>Textiles are also recognised as a high risk product.</p>	<p>use a variety of cleaning services within our supply chains and operations, which include:</p> <ul style="list-style-type: none"> • laundry services; • house-keeping services – some of these are done in-house and others are supplied by third-parties; • general cleaning of public spaces – these services are supplied by a third party. We contract with a different supplier for night cleaning of public spaces; • dish cleaning – these services are supplied by a third party. <p>Cleaning and restaurant workers are vulnerable to modern slavery in the hospitality sector, especially as they are recognised as a low-skilled and low-paid workforce. This is also true of the security and massage workforce. We have processes in place (as described above) to monitor that contractors working on our premises are allowed to work in Australia and are treated in accordance with relevant laws. Along with our global and local policies and procedures, we have taken steps to mitigate these risks by undertaking an audit of our contractors as described at 4.3 below.</p> <p>Further, our linen (e.g., towels) and bedding are sourced at a Group level, however, our Procurement Policy and other pre-qualification and due diligence processes are followed to mitigate risks and to ensure that the supplier complies with all laws, regulations and our policies, and is the best option for the Group.</p> <p>The Shangri-La Group has a number of policies and procedures in place (as</p>
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		discussed at 4.2 below) designed to assess and address the risks of modern slavery. We have also discussed geographic risks related to this below.
Geographic risks	<p>Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio economic factors like poverty.</p> <p>The World Bank's Worldwide Governance Indicators are a useful tool which measure the quality of six key dimensions of governance in over 200 countries and can help organisations with their commercial risk assessments. These indicators include: Voice and Accountability; Political Stability and Absence of Violence/Terrorism; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption.</p> <p>The Global Slavery Index is another useful tool to identify the prevalence of modern slavery and human trafficking in a particular country, and to assess the adequacy of a government's response to modern slavery and human trafficking risk.</p> <p>We considered the 2023 Global Slavery Index to confirm that we do not directly engage with any suppliers in the countries identified in the 2023 Global Slavery Index as taking the least action in respect of modern slavery.</p>	<p>We do not directly engage with any suppliers in the countries identified in the Global Slavery Index, Corporate Governance Index, Fundamental Rights as taking the least action in respect of modern slavery</p> <p>Notwithstanding this, in order to mitigate any geographic risks in our supply chains, our Group Procurement Policy and other pre-qualification and due diligence processes are followed to ensure that suppliers comply with all relevant laws, regulations and our policies, and are the best option for the Group.</p> <p>Further, we also use the country risk as a tool to guide our identification and assessment of geographic risks in our supply chains.</p>
Entity risks	Some businesses or other entities may have a higher risk because of poor	At this stage, we have not identified any specific entity risks during this reporting period.

	governance structures, a record of treating workers poorly or a track record of human rights violations.	
Operational risks	Operational risks are those modern slavery risks that form part of our day-to-day provision of hotel services. These include the management of our employees (including casual staff), temporary workers and contractors (including managing safe working conditions for our workers), our procurement of marketing and legal services and also supply chains that contribute to our operations, such as cleaning services/ housekeeping.	<p>We acknowledge that there are operational risks in our day-to-day provision of hotel services, including the management of our direct workers. In particular we understand that lower-skilled and migrant workers, especially casual staff, may be less aware of their workplace rights.</p> <p>For more information regarding the specific steps we are taking to assess, address and mitigate these risks see Section 4.3.</p>

4. Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

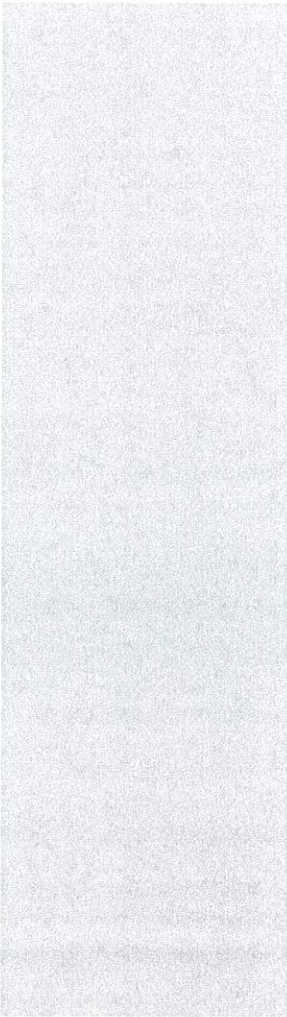
4.1 Actions taken in the reporting period

Set out below in this section is an overview of the steps we have taken or continued to implement during this reporting period to assess and address the risks in our operations and supply chains.

4.2 Global Policies and Procedures

The Australian Shangri-La Reporting Entities are part of the Shangri-La Group which has a number of policies and procedures in place designed to assess and address the risks of modern slavery.

Global Policy/ Procedure	Explanation
New initiatives	
Human Rights Due Diligence	In FY24, the Shangri-La Group began working with an external human rights advisor to establish a comprehensive, group-level human rights due diligence assessment. The purpose of the assessment is to assist the Group: (i) better understand the potential and actual human rights risks associated with its operations, products, and services; and (ii) identify gaps within its current risk



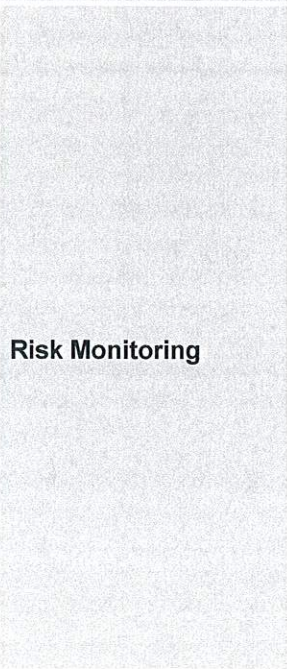
management framework and determine where our human rights approach may require strengthening.

This assessment is a structured, multi-phased journey spanning two years. It begins with a detailed review of the current best practice for human rights processes and frameworks across our sector and operating regions. During this initial phase, we also study relevant regulatory contexts and frameworks, conduct peer comparisons, and fully map our value chain. These activities will help us identify any areas of our value chain with exposure to human rights risks.

Shangri-La Group are engaging with internal and external stakeholders throughout this process to ensure it considers a broad spectrum of opinions and experience and considers diverse perspectives on human rights risks, impacts, and actionable measures. To identify areas for improvement and strengthen our alignment with international standards, we evaluate our approach against the United Nations Guiding Principles on Business and Human Rights. Our industry peer benchmarking exercise will also provide insights into the maturity of our practices and highlight opportunities to enhance our approach.

The project's ultimate goal is to use the insights we gain to prioritise our human rights risks based on their severity and likelihood. These findings will then be validated through workshops. The process will conclude with the development of a strategic roadmap outlining targeted actions and key performance indicators to address gaps, mitigate human rights risks, and meet stakeholder expectations.

We are still in the early stages of our human rights due diligence assessment. However, we are proud to be taking action that reflects our ongoing commitment to continuously exploring and implementing robust human rights practices. This work is part of our broader vision for conducting sustainable and ethical business operations.



Risk Monitoring

In FY24, the Shangri-La Group improved its risk monitoring by referencing international indices that cover environmental, social, and governance topics, such as quality of living, resource abundance, and human rights.

The Shangri-La Group also adopted monitoring technology to collect and analyse large quantities of data and news related to our suppliers. These actions provided us greater visibility over regulatory requirements, geopolitical issues, human rights and environmental issues, and other risks associated with our suppliers.

In FY 24, the Shangri-La Group conducted risk assessments on more than 100 of our largest suppliers who make up almost 27% of our procurement spend.

Shangri-La Group also conducted 71 self, third-party or surveillance assessments were completed across our critical Tier 1 suppliers. We evaluate our suppliers actions across five key areas: environment, labour, health and safety, business ethics and management systems. The Labour section includes questions about child labour and forced labour.



When Shangri-La Group identify a risk, we collaborate with the supplier involved to develop and implement CAPs. CAPs serve as a roadmap for our suppliers, outlining specific actions, timelines, and responsibilities to mitigate the identified risks and ensure compliance with our standards and requirements. This collaborative and proactive approach addresses root causes, fostering a culture of continuous improvement that helps suppliers stay compliant and mitigate future risks. In FY24, Shangri-La Group issued 33 CAPs

Global Modern Slavery Training

In FY24, the Shangri-La Group launched a compulsory online training course for all staff about modern slavery and human rights as part of its core curriculum, via the Shangri-La Academy (our online training platform) (**Global Training**). The Academy has courses on this and other topics covering work health & safety, and procurement.

The Global Training has been prepared by the Shangri-La Group to inform staff what is modern slavery and human trafficking, signs of modern slavery in the hotel industry, and incident reporting procedures.

The Global Training has been developed to:

- be bespoke and specific to the Hotel Industry and Shangri-La Group;
- highlight key policies (such as our Human Rights Policy and Supplier Code of Conduct);
- include specific indicators of red flags and what to look out for; and
- make clear how to report an issue or concern.

Responsible Sourcing and Risk Monitoring Training

In FY24, Shangri-La Group also conducted responsible sourcing and risk monitoring training for the Procurement teams at its headquarters and regional offices. The training focused on supplier assessment and development, as well as local sourcing strategies. These important sessions enhanced our employees' understanding of responsible procurement practices and ethical sourcing.

In FY24, the Shangri-La Group implemented a new and improved Supplier Pre-Qualification Checklist. This is applicable at a global and local level to all new suppliers and any existing supplier's whose information in the supplier portal has expired.

Global Training and Development

Purchasing processes

In accordance with the Shangri-La Group's procurement processes, whether suppliers are sourced locally or abroad, all new suppliers go through a supplier pre-qualification process. In this process, our business partners are required to register themselves on Shangri-La's shared procurement portal by providing certain details of the business (entity name, ABN, email address, etc.) and to accept the Global Supplier Code of Conduct. Once registered, the business

then needs to undertake the 'qualification' step, by providing details of its business registration and its financial details to facilitate payment of fees.

As part of this process, pre-qualification screenings are conducted to determine whether the potential suppliers meets the Group's requirements. The relevant team reviews and evaluates information regarding potential suppliers, including their company ownership and background, products and/or services, financial stability, licences, certificates, quality and safety standards, supply coverage, environmental and social responsibility, and other relevant information.

All Heads of Departments are trained on compliance with the procurement process.

Ongoing Initiatives

Global Supplier Code of Conduct

Our Global Supplier Code of Conduct requires our suppliers, their employees, subsidiaries, affiliates and subcontractors to uphold the Shangri-La Group's core values and to adhere to ethically, socially and environmentally responsible practices when doing business with the Shangri-La Group. The Global Supplier Code of Conduct requires suppliers to comply with all laws and explicitly prohibits any form of slavery, forced labour and human trafficking or any contribution to such practices. Our Code of Conduct applies to our global and local suppliers.

Global Code of Conduct and Ethics for Employees and other policies

We operate under a Code of Conduct and Ethics that requires all of the Shangri-La Group's affairs to be conducted in full compliance with the law. Employees who commence work with the Shangri-La Group are inducted on the articles of the Code of Conduct and Ethics and sign a copy at induction. Regular refresher training is also undertaken. This Code of Conduct and Ethics is supplemented with policies and procedures regarding workplace health and safety, equal opportunity and respect at work, anti-harassment and bullying and others.

Human Rights Policy

In FY23, the Shangri-La Group adopted a new Human Rights Policy that requires the Shangri-La Group to conduct its business in an honest and ethical manner, which respects human rights and the dignity and wellbeing of individuals.

The Human Rights Policy specifically prohibits discrimination and harassment, any forms of forced labour, including trafficked, coerced, bonded, indentured or child labour in its business operations and supply chains. It also provides that the Shangri-La Group is committed to observing the highest standards of human rights and does not tolerate any form of slavery and human trafficking within its operations or supply chains.

Responsible Sourcing Policy

In FY23, the Shangri-La Group adopted a new Responsible Sourcing Policy which provides that the Shangri-La Group is committed to conducting business in a responsible and sustainable manner, recognising the importance of responsible sourcing in achieving this goal.



Responsible Sourcing Programme

The Responsible Sourcing Policy provides that the Shangri-La Group strives to source products, materials and services that are produced in a socially and environmentally responsible manner throughout its supply chain. As a responsible organisation with global outreach, we aim to deliver increased reliability, quality and productivity throughout our supply chain.

The Responsible Sourcing Policy enshrines our commitment to ethical conduct, human rights, prohibiting child and forced labour in our operations and supply chains, environmental responsibility, diligence and record keeping, and responsible and continuous improvement.

To supplement our Responsible Sourcing Policy, we have developed a comprehensive Responsible Sourcing Programme that promotes transparency, sustainability, and ethical conduct throughout our supply chain, to positively impact more communities.

The programme provides us with a better understanding of supplier-related risks and ensures we are notified promptly as risks arise, enabling us to take appropriate, proactive action. We are able to identify and mitigate potential risks efficiently and safeguard against issues such as unethical practices, environmental damage, and human rights violations.

Our Responsible Sourcing Programme encompasses the following six components:

- Supplier Code of Conduct: ensuring all suppliers acknowledge and accept the requirements of our Supplier Code of Conduct;
- Risk assessment: assess and determine risk of critical suppliers by considering spend, country, reputation, industry and product type;
- Risk monitoring: monitor risks for critical suppliers by conducting: (i) online self assessment; (ii) on-site third party assessment; and (iii) on site surveillance assessment;
- Risk mitigation and remediation: providing remediation through corrective action plans and supplier mentoring. Using best practice and benchmarking against the industry;
- Supplier capacity building: providing training on expectations for suppliers, delivered face-to-face and digitally; and
- Risk analysis and reporting: to enforce regulatory compliance.

For more information on our Responsible Sourcing Program please see our [2024 Sustainability Report](#) (pgs. 58 – 61).

Whistleblowing and Whistle-blower Protection Policy

A Whistleblowing and Whistle-blower Protection Policy is in place at the Group level to encourage employees, workers and suppliers to report suspected wrongdoing as soon as possible, in the knowledge

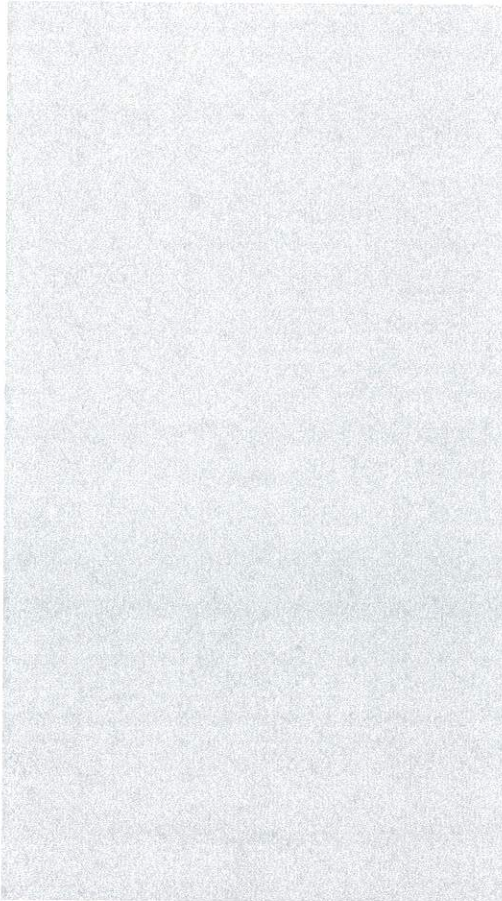
that their concerns will be taken seriously and investigated appropriately. This allows for a grievance reporting channel for employees and suppliers to report violations of Global policies and procedures.

4.3 Local Policies and Procedures

During the FY24 reporting period, we also had a number of local procedures in place to assess and address modern slavery risks. However, we are looking to expand on these in our future reporting years.

As this is Lilyvale’s first reporting period, it plans to further consider its reporting obligations in FY25 and consider if there are any appropriate actions it can take beyond implementing the policies and procedures of Shangri-La Australia and the Shangri-La Group.

Local Policy/ Procedure	Explanation
<p>Anti-Modern Slavery Policy</p>	<p>In FY24, Shangri-La Australia approved its Anti-Modern Slavery Policy. The objective of the Policy is to assist us to monitor high risk suppliers, mitigate risks and set out our expectation regarding modern slavery risks and reporting on modern slavery incidents</p>
<p>Labour and Monitoring Systems</p>	<p>Shangri-La Australia continues to use labour monitoring and payroll systems to check eligibility of employees in Australia before they are hired. We also ensure the right to work at time of hiring and observe the provisions of the <i>Workplace Relations Act 1996 (Cth)</i> and <i>Fair Work Act 2009 (Cth)</i> regarding minimum wage requirements for which we fully comply.</p> <p>Lilyvale (Shangri-La Sydney) is in the process of submitting its third compliance audit, assessing its compliance with the applicable Award and the National Employment Standards under the <i>Fair Work Act 2009 (Cth)</i>.</p>
<p>Contractor audit</p>	<p>Shangri-La Australia continues to audit our contractors, which requires our contractors to provide us with:</p> <ul style="list-style-type: none"> • a statement of coverage of a valid Workers Compensation policy which includes the policy number, WIC # Industry coverage, number of workers covered and wage estimates for the year; • a copy of the relevant Industrial instrument or Award that supports the engagement of employees, including pay rates and conditions;

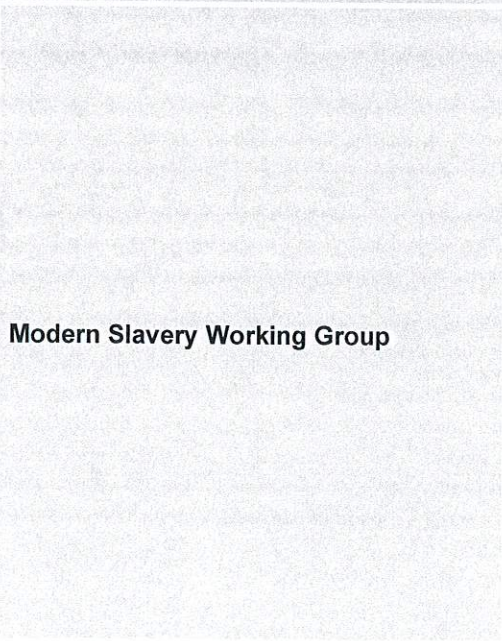


- a sample contract of employment with the name redacted for a full-time, part-time, and casual employee;
- workplace safety list of mandatory training;
- a dispute resolution policy and process to resolve the issue; and
- compliance evidence of training on bullying, harassment, and sexual harassment.

As a result of our contractor audits, we identified several expired documents, and we were able to contact the relevant contractors to obtain updated documentation.

With the upcoming increase to the minimum wage from July 2025, we will also be requesting updated documents from all contractors to enable us to assess and ensure legal compliance.

During our contract renewal process, we also require all contractors to provide updated licences to the extent necessary to continue to provide their services.

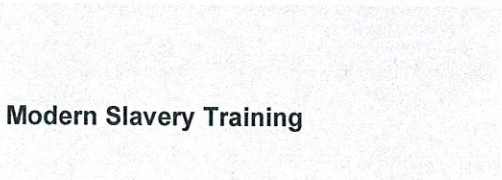


Modern Slavery Working Group

Following the establishment of Shangri-La Australia's multi-disciplinary Modern Slavery Working Group in FY23, it continues to meet on a regular basis to assign roles and responsibilities, delegate tasks, set milestones and track our progress in line with our anti-modern slavery compliance program, and to ensure we are complying with the requirements of the Modern Slavery Act and with regard to Commonwealth Guidance.

In FY24, the Working Group worked closely with the Shangri-La Board and business to approve and implement the Anti-Modern Slavery Policy.

Our Modern Slavery Working Group continues to work with modern slavery experts in Australia to help develop and refine our approach to assessing, addressing and mitigating risks of modern slavery.



Modern Slavery Training

In FY24, Shangri-La Australia encouraged its staff (which including its subsidiaries' staff) to complete the compulsory Global Training to 'Recognize Signs of Modern Slavery and Human Trafficking' via the Shangri-La Academy.

General Induction Training

Our hotels in Australia (such as Shangri-La Sydney) continue to locally conduct training on modern slavery and human rights as part of our induction on the Global Code of Conduct and Ethics for Employees.

This is to equip employees with the knowledge and training that allows us to operate in an ethical and transparent manner.

4.4 Our future modern slavery roadmap

4.4.1 Section 7, sets out our future modern slavery compliance roadmap together with key deliverables we intend to implement. These steps are driven by our global policies and processes and have been informed by the Commonwealth Guidance, Supplementary Guidance, together with our consideration of emerging market practice in Australia.

5. Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions

We intend to continue to use key performance indicators (KPIs) to measure how effective we have been in identifying and mitigating modern slavery risks in our operations and supply chain. Based on these KPIs, we will continually assess and improve our modern slavery compliance framework. Some of these KPIs include the following for FY24 while future KPIs will be driven by our modern slavery roadmap (see 'looking ahead') in Section 7.1:

No.	Key objective	Key performance indicator
1.	Implement our Anti-Modern Slavery Policy	<p>In FY24, the Shangri-La Australia board considered and approved the Anti-Modern Slavery Policy, a key KPI for FY24.</p> <p>In the next reporting periods, we will consider if our Policy has been implemented successfully across the business by implementing this as part of our onboarding system for all new staff members (including Lilyvale staff); and we are aiming for all</p>

		of our staff to complete this by the end of FY25.
2.	Prompt remediation of critical issues or incidents which are recorded through our current reporting processes	<p>Recording the number of promptly resolved modern slavery or ethics issues that have been raised.</p> <p>We confirm we have not identified any specific instance of modern slavery during the reporting impacting Shangri-La during FY24.</p>
3.	Ongoing training and education, including educating staff on Shangri-La's Anti-Modern Slavery Policy	<p>Whether modern slavery training and education for staff has occurred during the next reporting period and how many staff members completed the training.</p> <p>In FY24, the Shangri-La Group rolled out Global Training on Modern Slavery which was compulsory for all staff. 452 Shangri-La Australia staff members completed the Global Training on Modern Slavery.</p>

6. Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls (a joint statement must also describe consultation with the entity giving the statement)

6.1 As this is a Joint Statement we are required not only to describe the consultation with the entities which the Australian Shangri-La Reporting Entities own or control, but also the consultations processes as between the parties providing this Joint Statement.

6.1.1 As the Australian Shangri-La Reporting Entities are largely governed by the activities of the Shangri-La Group, Shangri-La Australia consulted with Lilyvale and Shangri-La Group in preparing this Joint Statement.

6.1.2 As Shangri-La Australia is the parent company of, and operates, Shangri-La Sydney (that is managed by Lilyvale) and Shangri-La The Marina, Cairns, key stakeholders from each hotel, including human resources, finance and general



management have been involved in the development and review of this Joint Statement prior to Board approval.

7. Criterion 7: Provide any other relevant information

7.1 Looking ahead

- 7.1.1 In addition to adhering to the Global policies and processes implemented by the Shangri-La Group, in the coming reporting periods we intend on implementing the following projects.
- (a) **Implementing and educating our staff on the Anti-Modern Slavery Policy** – in FY24, Shangri-La Australia approved its Anti-Modern Slavery Policy to help Shangri-La Australia and its subsidiaries monitor high risk suppliers, mitigate risks and set out our expectation regarding modern slavery risks and reporting on modern slavery incidents.
 - (b) **Continued modern slavery training for staff** – to supplement the Global Training, we intend to continue to roll out local and bespoke training to help our staff generally to better identify and understand modern slavery risks and incidents and build organisational awareness at a local level.
- 7.1.2 We consider that these steps and the implementation of Global approach will put us in a good position to identify and mitigate modern slavery risks in our business operations and supply chains and build on the global measures the Shangri-La Group already has in place.
- 7.1.3 These projects set out in the 'looking ahead' section are of crucial importance to us. We understand the role we have to play in combatting modern slavery and look forward to reporting on the steps we are taking and progress made in our next Joint Statement.



MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
1. Identify the reporting entity.	4
2. Describe the reporting entity's structure, operations and supply chains.	4-7
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7-11
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	11-18
5. Describe how the reporting entity assesses the effectiveness of these actions.	18-19
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	19
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	19-20