



Modern Slavery Statement

Effective from July 2022

Policy Statement

Flybuys is pleased to be making its third modern slavery statement, building on our previous work on modern slavery, continuing to learn more about our supply chain and operations and any associated risks, and enhancing the maturity of our approach to modern slavery.

Loyalty Pacific Pty Ltd (Flybuys) opposes modern slavery in all forms. Flybuys is committed to the highest standards of conduct and ethical behaviour in our business activities and to promoting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance. This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth).

1. The Reporting Entity – Flybuys

Flybuys' business structure has not changed during its financial year ending 26 June 2022 (the **current reporting period**). Flybuys is an Australian proprietary company limited by shares. From 2011 until November 2018, Flybuys operated as a business unit of Coles Group, where sourcing fell under the scope of the Coles Group processes and procedures. Following the demerger of Coles and Wesfarmers in 2018, Wesfarmers retained a 50% stake in Flybuys and Coles Group holds the other 50% stake.

Flybuys is headquartered in Melbourne, Victoria with its registered office in Perth, Western Australia. Flybuys has approximately 300 employees in Australia with its head office in Melbourne and a co-working space in Sydney although operates a flexible hybrid work model.

This modern slavery statement describes the steps Flybuys has taken during the current reporting period to minimise the risks of modern slavery occurring in our operations and supply chains, and also reports on the progress made against commitments Flybuys set out in our second modern slavery statement for the financial year ending 27 June 2021 (the **second reporting period**).

Recognising that addressing modern slavery risks is a process of continuous improvement, this statement also looks at Flybuys' plan for future action.

1994

Established in 1994, Flybuys is Australia's most popular loyalty program, helping Australians enjoy a wide range of rewards and benefits when they shop. Flybuys is committed to serving its more than 8 million active members with new and exciting ways to engage with the program.

Head office in Melbourne.



Satellite office in Sydney.



300

As at the end of the current reporting period, Flybuys has approximately 300 employees.



¹ The term modern slavery is used to denote practises defined in the Modern Slavery Act 2018 (Cth) (**MS Act**) and includes eight types of serious exploitation: servitude, slavery, forced labour, forced marriage, the worst forms of child labour, debt bondage, deceptive recruiting for labour or services and trafficking.

Our Shareholders



2. Our Approach

See an overview of Flybuys' approach and key focus areas for each reporting period to date on modern slavery, to illustrate our journey and development thus far.



3. Our structure, operations and supply chain

3.1 Our operations

Flybuys loyalty program has been running since 1994 and has over 8 million active members.

With no participation fees, Flybuys is capable of generating significant benefits for members through points collect from their everyday shopping activities.

Flybuys points can be collected across 21 participating brands including retailers such as Coles Supermarkets, Kmart and Target. Flybuys also allows members to collect points via its financial, insurance, travel services and survey partners. 13 of our participating brands are also affiliates of Flybuys (i.e. either shareholders, or owned or operated by shareholders, of Flybuys).

During the current reporting period, Flybuys launched its partnership with Bunnings Warehouse and Officeworks (both of which are owned by a shareholder of Flybuys), providing more places for Flybuys members to collect points. Flybuys notes that the modern slavery risks associated with the operations and supply chains of Bunnings Warehouse and Officeworks are reported on in the Modern Slavery Statement published by Wesfarmers Limited, which describe their robust approach to modern slavery risks (including the use of technology to map out supply chains, and having their own modern slavery and ethical sourcing audit programs, training programs and grievance mechanisms, among other things).

Flybuys members redeem many millions of rewards each year. There are thousands of rewards to choose from around 30 suppliers. Members can redeem their points for a range of different things such as

gift cards, merchandise and donations to selected charities, money off their next shop at participating partners, flights and accommodation via Flybuys travel and transferring their Flybuys points to Velocity Frequent Flyer points.

These redemptions are generally made through the Flybuys Rewards Store, Flybuys app, at some Flybuys participating partner point of sale (POS) and via the Flybuys Service Centre.

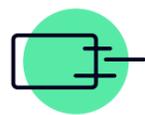
Flybuys considers that a good member experience is the core of our business and is focused on providing a service that members value.

We seek to achieve this by collaborating with a wide range of leading companies, ensuring members earn meaningful rewards for participation, and offering simple, transparent processes for points earning and reward redemption.

In addition to operating the Flybuys loyalty program, Loyalty Pacific Pty Ltd also has a business-to-business data arm which operates under the registered business name “Unpacked by Flybuys” and supplies data services to third parties. There is no supply of services back to Flybuys however Flybuys seeks to ensure that the contracts governing the Unpacked services contain our standard modern slavery clauses. During the current reporting period, there has been no material change to the operation of the Unpacked business.



8m
Active Flybuys members across Australia



15
Flybuys cards scanned every single second



4000+
Physical retail outlets partnered with Flybuys

3.2 Our Supply Chains

During the current reporting period there have been no notable changes to the nature of the Flybuys supply chain. Our supply chain reflects a non-bricks and mortar technology retail business and includes approximately 300 Tier One suppliers.

Program rewards through the redemption of loyalty points continues to make up a large category of spend within the Flybuys supply chain. As mentioned above, members can redeem their points for:

- Money off shop at participating partners (e.g. Coles, Kmart, Target), flights and accommodation and Velocity Frequent Flyer points –with the suppliers being various Flybuys program partners;
- Gift cards –supplied directly by participating Flybuys program partners (e.g. Coles, Kmart, Target, Bunnings Warehouse, Officeworks) or through gift card providers;
- merchandise –mostly sourced from a select number of merchandise providers; and
- donations to selected charities.

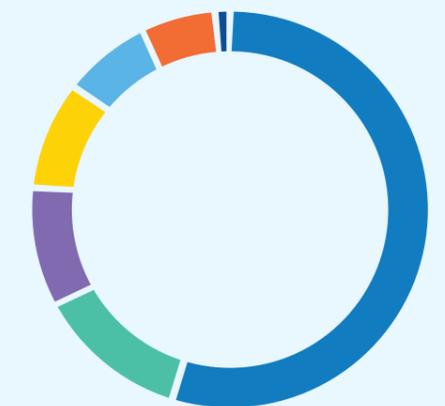
In order to manage and support the Flybuys Loyalty Program, Flybuys procures the services of technology suppliers and this continues to make up another large category of spend in our supply chain. During the current reporting period there has been a continued use of staff augmentation services in relation to IT and analytics specialists.

The majority of staff sourced via augmentation services remain located in Australia, with a small number based in India. Our Customer Service

Centre is outsourced to a supplier primarily based in Australia with some contingent support provided by resources based in New Zealand and the Philippines. Supply contracts for labour hire were based on either Flybuys’ standard terms or negotiated supplier terms, which all include clauses which impose contractual obligations on the supplier to ensure that there is no modern slavery in their operations or supply chains, and to provide Flybuys with information on modern slavery annually (among other things).

Spend on marketing activity to support the Flybuys Loyalty Program also forms a large category of spend in the Flybuys supply chain and includes spend on professional marketing services as well as print and promotional goods and services providers and food and beverages.

Flybuys has small spend categories for professional services as well as stationery.



- Program Rewards
- Professional Services
- Marketing Services
- Property and Facilities
- ICT
- Contingent Labour
- Print and Distribution

Figure 1 shows the spread (by expenditure) of the products and services areas of the suppliers which make up Flybuys’ supply chain for the current reporting period.



We acknowledge modern slavery risks do not stop at our Tier One suppliers. This is because the manufacturing of products and supply of services procured by our Tier One suppliers may take place outside of the identified countries. Flybuys will continue to work with our suppliers to build a comprehensive and transparent understanding of our supply chain. This includes key areas such as Program Rewards and Information, Communications and Technology which are areas that include complex global supply chains which can involve a wide range of materials, labour and other services.

Figure 2 shows all identified locations of assessed suppliers that support Flybuys operations. Almost all of the Flybuys Tier One suppliers assessed were based in Australia (70%) and the United States (20%).

4. Risks of modern slavery practices in our operations and supply chains

4.1 Modern slavery risks in our supply chains

We have a responsibility to respect human rights through all of our business activities and relationships under the UN Guiding Principles on Business and Human Rights (UNGPs). This includes the human rights that protect against modern slavery.

The UNGPs are the recognised global standard for preventing and addressing human rights harm by businesses. They provide an important framework to help us, and other businesses, understand and respond to modern slavery risks.

In the current reporting period, we again applied the UNGPs in our modern slavery risk assessment to identify and explain how we may cause, contribute to, or be directly linked to modern slavery, and understand how we should respond.

The UN Guiding Principles on Business and Human Rights are a set of guidelines to prevent, address and remedy human rights abuses committed in business operations. In the preparation of this year's Statement, we again used these guidelines as part of our supplier assessment process so we could effectively identify and understand if any supply chain risks existed.

The Procurement team at Flybuys oversees key procurement activities and is accountable for the procurement policies and processes. Throughout the current reporting period, Flybuys further developed its risk-based approach to managing existing and new suppliers. Our risk assessment process was expanded to include a more sophisticated analysis, involving a two-staged, eight-point evaluation to identify and assess modern slavery risks.

An initial assessment is first done by Flybuys based on objective factors relevant to the modern slavery risks in the supplier (including but not limited to the supplier's industry, the type of products/services supplied, Flybuys' expenditure with the supplier). A further assessment is then conducted based on our analysis of the suppliers' responses to our supplier questionnaire which seeks information specific to the suppliers' own modern slavery compliance and reporting practices.

The aim of this approach is to assist in identifying potential modern slavery red flags relating to suppliers by assessing the supplier and their questionnaire responses against a list of modern slavery risk indicators (refer to Figure 3, which is based on Appendix 1 of the Guidance to Modern Slavery Act). When reviewing suppliers' questionnaire responses, an unsatisfactory response to one or more questions does not necessarily mean Flybuys is unable to work with the supplier, but may indicate further engagement with the supplier and/or additional risk management steps are required. Once the questionnaire responses are thoroughly reviewed, follow-up consultations are conducted where required.

In the current reporting period, risk assessments were undertaken in respect of suppliers which make up approximately 90% of Flybuys total supply expenditure. Our approach was to focus on suppliers that are more material in our operations due to the volume and importance of products and services supplied. We acknowledge that only assessing suppliers within this range does not necessarily exclude potential modern slavery risks with lower expenditure suppliers.

An initial risk rating was allocated based on the service/product provided, the supplier's industry,



service/product country of origin and the volume of expenditure with that supplier. Based on these, the key findings from the current reporting period's assessment are outlined below.

Initial risk assessment results

- 2 suppliers (including a merchandise reward provider) were initially identified as a potential high risk
 - 18 suppliers were identified as a potential medium risk
 - All of the reward providers assessed were identified as either high or medium risk.
- After distributing supplier questionnaires and reviewing their responses, follow-up consultations were undertaken with approximately 30% of the assessed suppliers, including one of the major supplier of merchandise rewards. Ratings were then applied based on this process focusing on the supplier's own compliance to modern slavery laws and reporting requirements. The final assessment results are outlined below:

Final risk assessment results

- 0 suppliers were rated as high risk
- 1 supplier (service provider, not reward related) was rated a possible medium risk*.

*We are continuing to consult with this supplier to further understand and assess the materiality of any identified risks and at the conclusion of that consultation we will assess what action by Flybuys, if any, is appropriate.

Based on our review for the current reporting period, Flybuys considers that the risk of modern slavery in its supply chain continues to be relatively low. Although we recognise that some of our Tier One suppliers operate in high-risk industries (particularly in our Program Rewards category), these risks are mitigated by the level of professionalism and leadership shown by these suppliers with their modern slavery practices.

Flybuys continues to engage a high volume of staff augmentation services for IT and analytics specialists. Flybuys recognises that the staff augmentation industry generally has a higher risk of forced labour. We note that the majority of specialists engaged by Flybuys via augmentation services were based in Australia, which significantly moderates the risk of forced labour. For a minority of specialists based overseas (being New Zealand and India), Flybuys engaged with those specialists via suppliers based in Australia with whom appropriate contracts are in place, with provisions which require the supplier to take all reasonable steps to ensure that there is no modern slavery in its operations and supply chains, or that of its subcontractors and service providers (among other things). Further, based on the responses to the supplier questionnaire and further engagement with the supplier which provides specialists based in India, we found that they had good policies and processes in place to address modern slavery risks.

In the next reporting period, we will continue to work with our supply chain to explore scope to undertake a modern slavery 'deep dive' and case study with at least one of our Tier One suppliers.



4.2 Modern slavery risks in our operations

In the current reporting period, we have taken preliminary steps to start looking into the modern slavery risks associated with our shareholders and program partners.

All of Flybuys shareholders and program partners, which are all large and reputable brands, are required to and have previously submitted modern slavery statements to report on their modern slavery risks and practices.

Based on a high-level review of the modern slavery statements most recently submitted by our shareholders and program partners:

- while they may be at different stages or sophistication levels in their approach, all shareholders and program partners appear to be taking steps to assess and address modern slavery in their operations and supply chains; and
- a majority to the shareholders and program partners have or are planning to implement modern slavery remediation frameworks and processes.

This supports Flybuys' continued focus and efforts on modern slavery risks in its supply chain during the current reporting period.

In the next reporting period, Flybuys will continue to take steps to further understand the risk of modern slavery in its shareholders and program partners.

Figure 3

Types of Exploitations



- Trafficking in persons
- Slavery
- Servitude
- Forced labour
- Forced marriage
- Debt bondage
- Worst forms of child labour
- Deceptive recruiting for labour or services

LEADS TO

Risk indicators



- Use of unskilled, temporary or foreign labour, short-term contracts or outsourcing
- Work is undertaken at night time or in remote or isolated locations, such as security or cleaning
- Cost requirements or delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size
- Reported high risk of labour exploitation by media, international organisations or NGOs relating to the product, raw materials, services or country
- Deceptive recruitment practices or unethical recruitment strategies
- Child labour, particularly in hazardous conditions
- Complex or opaque supply chains
- Weak rule of law
- Country not ratified

LEADS TO

Inherent modern slavery risks



- Within country and geographic region
- Within sector and industry associated with the product and services.

5. Actions taken by Flybuys to assess and address the risks of modern slavery in our supply chain and operations

5.1 Assessing modern slavery risks

The key actions that Flybuys undertakes to assess and address modern slavery risks can be grouped into the following areas:

Assessing modern slavery risks:

- Supplier assessment and consultation process
- Supplier onboarding process

Addressing modern slavery risks:

- Policies and procedures for supply chain management
- Grievance and feedback mechanisms
- Remediation framework and guidance
- Training and capacity building

Exploring use of technology to assist with assessing and addressing risks.

Supplier assessment and consultation process

The supplier assessment and consultation process adopted during the current reporting period has been discussed in detail under section 4.1 above.

Additional comments are set out below:

- We were once again pleased with the level of engagement from our suppliers in the supplier consultation process, especially with the supplier[s] with which we had further engagements to deepen our understanding of their modern slavery risks and compliance practices.
- Many of our suppliers either have in place or are developing their own protocols and policies to address modern slavery risks.
- In our previous modern slavery statement, Flybuys acknowledged that there are increased risks in the shipping and logistics industry as a result of the COVID-19 pandemic. In terms of the first tier of Flybuys supply chain, this continues to be a relatively low risk on the basis that Flybuys only uses Australian-based couriers for shipping services and does not generally require overseas shipping or logistics services. However, we note one of the suppliers has identified indirect delivery workforce as a risk in their modern slavery statement. Accordingly, we will undertake further engagement with this supplier to better understand the risks deeper in their supply chain in the next reporting period. We will also continue to seek engagement with other suppliers to gain greater visibility of these risks deeper within their supply chains in upcoming reporting periods.



- As the COVID-19 pandemic continues, Flybuys has continued to monitor modern slavery risks associated with the pandemic. We have noticed that there have been delays in the supply of certain ICT hardware, due to the impacts of the pandemic on our supplier's supply chains. Flybuys has worked together with the supplier to manage the delays through better forecasting and allowing for longer lead time, but without the need to put additional pressure on the supplier or its supply chain. In the next reporting period, we will undertake further consultation with this supplier with the aim to better understand any modern slavery risks in their supply chain.
- Flybuys will continue to aim to only engage suppliers with proven values, ethics and business practices, including those related to modern slavery and broader human rights issues.
- We will also continue to work with our suppliers to positively influence their response to modern slavery risks.

Supplier procurement and onboarding process

As noted in our previous statement, during the second reporting period Flybuys implemented a new vendor onboarding process which incorporates modern slavery considerations into the due diligence process.

This has further assisted Flybuys in monitoring risks of modern slavery in its supply chain and allowed Flybuys to engage with suppliers at an even earlier stage to ensure appropriate remediation steps are put in place if any risks are identified. For example, as part of the process of approving a new supplier, after they provided responses to our supplier questionnaire, we had further engagements with the supplier and its legal team to ensure that we were comfortable with their modern slavery compliance practices and that our agreement contained adequate provisions to impose contractual obligations on the supplier to ensure that there is no modern slavery in their operations or supply chains, and to provide Flybuys with information on modern slavery annually (among other things).

Recruitment and people management process

The nature of Flybuys' business means that there is low modern slavery risk in its operations from a human resources perspective. Our recruitment efforts are targeted in the Australian job market, and all employees are professionals. All employment contracts comply with the National Employment Standards. There are various avenues for employees to provide feedback, including employee surveys and quarterly check-ins. As noted below, Flybuys has a Whistleblower policy under which unethical and illegal activities associated with the company can be reported. All employees are provided communication and training on this policy at induction and annually.

5.2 Addressing modern slavery risks

Policies and procedures for supply chain management

Flybuys has a **Responsible Procurement Policy** and a set of **Supplier Minimum Standards**. Both have been approved by the Flybuys Board, have been communicated to Flybuys team members and are accessible on the Flybuys online internal portal.

As the Flybuys business continues to expand and evolve, in the next reporting period we will further refine our procurement policy(s) to (among other things) strengthen provisions relating to modern slavery. The updated policy will focus on requirements to confirm and verify compliance through the procurement process, including with requirements relating to human rights and environmental impacts. The updated policy will be clear that human rights impacts include modern slavery, as well as broader labour rights issues that may be modern slavery red flags, like harassment and discrimination, and workplace health and safety issues. The updated policy will also incorporate Flybuys' Modern Slavery Remediation Flowchart and guidance note by reference.

After consultation with one of its shareholders, the Flybuys Modern Slavery Working Group has also identified that there may be opportunities to improve or implement further procedures to enable Flybuys employees, contractors, partners, suppliers and the community to raise any concern in relation to modern slavery within Flybuys' operations and supply chain. Flybuys will look to assess this need and take any necessary steps in the upcoming reporting periods.

When any new suppliers are engaged, where possible we have continued to utilise our standard form contracts and documents, which contain

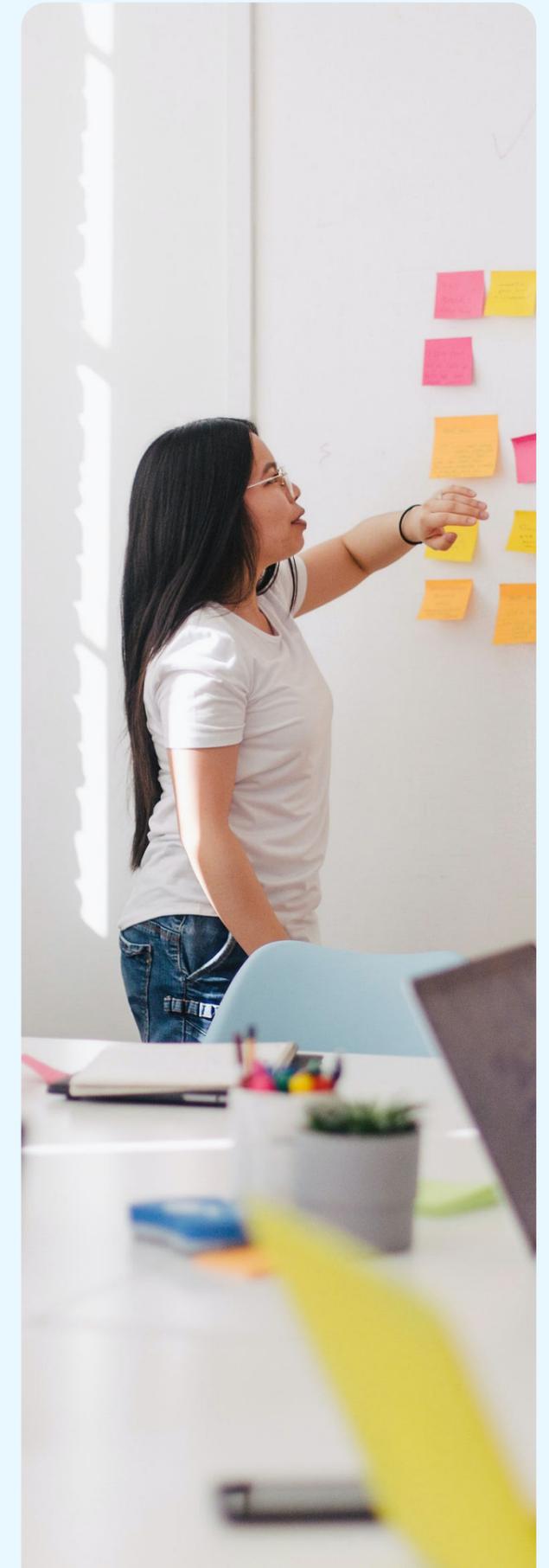
modern slavery clauses. These impose contractual commitments on our material suppliers to require them to meet minimum standards related to prevention of modern slavery and ongoing due diligence in their supply chains. Suppliers engaged over the course of the current reporting period have been generally supportive of such inclusions in the contracts. During the current reporting period, we also undertook a review of all of our supplier contracts (regardless of materiality) and sought to update any contract which did not impose contractual commitments on the supplier to require them to meet minimum standards related to prevention of modern slavery and ongoing due diligence in their supply chains, with our standard form modern slavery clauses. We have been pleased that the Suppliers associated with these contracts have worked with us to update their contracts accordingly.

Training and capacity building

Flybuys' employee online training platform includes a mandatory learning module on modern slavery. The modern slavery module has been completed by the majority of current team members and is mandatory for any new employees who join Flybuys. All employees are required to repeat this training once every 12 months. The online learning module raises awareness of modern slavery and our anti-slavery policies and procedures. In addition to modern slavery, there are other mandatory training modules which further promote ethical business practices across the organisation include whistleblowing training (as noted above) and Code of Conduct training (which includes anti-bribery).

The Flybuys People Experience Team monitor and report to Flybuys Leadership Team members on training compliance and follow up with any individuals if training is outstanding. If an employee still fails to undertake the training after reminders are sent from the People Experience Team, then this is escalated to the employee's direct manager.

As part of Flybuys' commitment to monitor the effectiveness of training in respect of modern slavery risk, it was identified that further training for the Procurement Team and certain managers who are frequently engaged in sourcing and dealing with suppliers would be beneficial. During the current reporting period, a training session in relation to modern slavery was conducted by external human rights experts, covering the context of the development of supply chain regulation (including the UNGPs), modern slavery and the Modern Slavery Act (Cth), the practical implications of modern slavery and the relevant regulations on Flybuys, and Flybuys' policy framework. The training session was attended by all members of the Procurement Team, selected managers from the Technology Team and the Marketing Team who are involved in the sourcing and ongoing engagement with suppliers, and the Senior Commercial Manager who manages the Flybuys Rewards Store and is responsible for sourcing and ongoing engagement with reward suppliers. The Modern Slavery Working Group received positive feedback from those who attended the training, who found it beneficial and had an improved understanding of the relevant issues and obligations.



Grievance and feedback mechanisms

The Flybuys **Whistleblower Policy** sets out a process for Flybuys representatives to raise concerns about improper conduct. Under the Whistleblower Policy persons are required to report failures of persons to comply with legal or regulatory obligations (such as modern slavery and human rights law), as well as conduct potentially damaging to Flybuys (which could include unsafe work practices and modern slavery risks). Under the Whistleblower Policy, contact details are provided for concerns to be raised, which includes an anonymous hotline managed by a third party. The Whistleblower Policy is available publicly on the Flybuys website and is also on the Flybuys employee online portal. In addition, there is a mandatory training module for all Flybuys employees to support employees in understanding when and how to report misconduct and to maintain a culture that encourages the reporting of unethical or illegal activities associated with the company.

During the current reporting period, the completion of this training module also became mandatory for Flybuys contractors (including those working under a staff augmentation arrangement). This will provide greater awareness of the feedback mechanisms available to our suppliers and contractors. Over the current reporting period, Flybuys has not received any complaints in respect of modern slavery.

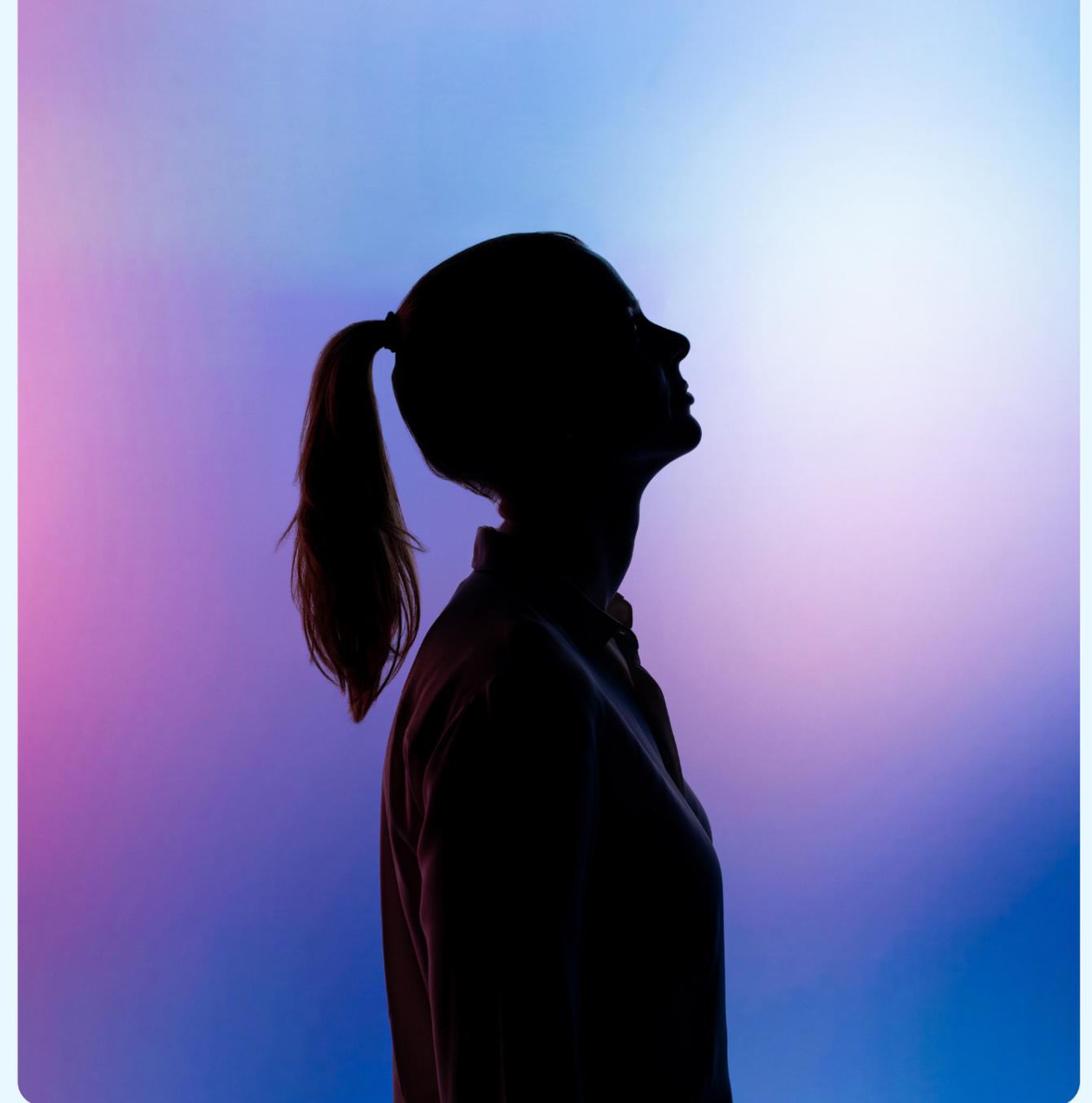
Remediation plan

Flybuys recognises the importance of educating and supporting its employees to not only identify potential modern slavery risks but also to understand what actions may be appropriate in the event a risk is found in the Flybuys supply chain or operations.

During the current reporting period, the **Modern Slavery Remediation Flowchart and guidance note** (which was drafted during the second reporting period) was finalised and incorporated into the Flybuys Crisis Management Plan. Whilst it is recognised that each situation must be addressed on its merits, taking a victim-centred approach, the Remediation Plan will be an important tool to guide Flybuys in dealing with any instances of modern slavery in our supply chain.

The Remediation Plan is intended to ensure Flybuys' actions to respond to modern slavery safeguards potential survivors of modern slavery, is appropriate and proportionate and that survivors are appropriately remediated. During the current reporting period, Flybuys' executive leadership team (being the first respondents to any issues or crisis under the Flybuys Crisis Management Plan) and the Head of Procurement were trained in respect of our Remediation Plan.

During the current reporting period, we engaged with and/or undertook a high level review of the modern slavery statements of our shareholders and program partners, and confirm that a majority of them have or are planning to implement modern slavery remediation frameworks and processes to cease and address impacts of modern slavery where discovered or alleged to be in their supply chains.



5.3 Technology solutions

Flybuys recognises that utilising technology solutions may provide opportunities to strengthen practices and procedures in relation to identifying risks of modern slavery. Flybuys has received recommendations from external advisers on technology solutions which are used by entities

whose size and operations are similar to Flybuys, and has commenced initial due diligence in relation to some of those options. Flybuys will continue with this in the next reporting period, with the aim to identify an appropriate tool to assist with the management and identification of modern slavery risk in our operations and supply chain.

6. Assessing the effectiveness of our actions

It is important for Flybuys to ensure that the actions we are taking are effective in helping to identify and mitigate the risks of modern slavery. The Modern Slavery Working Group is responsible for the overall oversight of actions to assess and address modern slavery risks and for the assessment and monitoring of those actions.

In Flybuys' third reporting period, Flybuys' primary indicator of the effectiveness of our approach is to evaluate our delivery against our commitments. As outlined in this statement, Flybuys has made significant progress against the commitments made in the previous reporting period.

Flybuys' modern slavery risk assessment of its supply chains has improved and matured in the current reporting period. Through the procurement team and contract managers, we continue to have an open dialogue with our suppliers which is demonstrated in the responsiveness to our due diligence processes, whether that be at the commencement of our contractual relationship or as we seek to understand more about our suppliers through our supplier consultations. Further engagement has also commenced with select high risk suppliers, and has assisted Flybuys in seeking better understanding and comfort around modern slavery issues. This engagement has allowed us to ultimately downgrade the risk rating of all suppliers that were initially classified as high risk to low, as we were able to gain comfort from the information provided relating to their modern slavery risk management and compliance programs.

As noted above, Flybuys' supplier onboarding platform has improved the early engagement of suppliers regarding supply chain and modern slavery. As a result of our online training programme, all Flybuys team members should understand how to identify risks of modern slavery in our supply chain and the key policies and processes underpinning Flybuys' commitment to mitigate risks of modern slavery. Regular completion of the mandatory training is monitored by the Flybuys People Experience Team. A knowledge and skill gap was identified the supplier procurement and onboarding process, and through employee feedback an appetite to learn more about modern slavery was communicated. As a result, team members who are at the 'frontline' of sourcing and engaging with suppliers along with senior managers were provided with further training so that they could feel confident in identifying modern slavery risks in our supply chain and operations, and the relevant key policies and processes.

A remediation framework and guidance is now in place to guide Flybuys in its remediation steps should a modern slavery incident or victim be alleged or identified.

As the approach to addressing modern slavery matures, Flybuys will continue to develop measures to assess the effectiveness of its modern slavery risk management.

7. Further consultation

In preparing this modern slavery statement and continuing our activities to identify and mitigate against risks posed by modern slavery, Flybuys has consulted with:

- external advisors for advice and to better understand opportunities for continuous improvement;
- procurement professionals outside of Flybuys for knowledge and experience sharing. Discussions included topics such as sourcing processes, the use of technology, and risk assessment techniques; and
- our shareholders for consultation and feedback.

Flybuys is committed to continuously improving practices, procedures and education to support in identifying and eradicating risks of modern slavery from our supply chain, and will continue to engage and consult widely within the anti-slavery community to help us fulfil this commitment.

Approval

Flybuys makes this statement in accordance with section 13 of the Modern Slavery Act 2018 (Cth) and constitutes Flybuys modern slavery statement for its financial year ended 26 June 2022. This statement was approved by the Flybuys Board on 4 August 2022.

Signed by

Steven Cain
Chairman, Loyalty Pacific Pty Ltd

Signature

A handwritten signature in black ink, appearing to read 'S. Cain', written over a light blue background.

Date

20.12.2022

flybuys

2022 Modern Slavery Statement for Loyalty Pacific Pty Ltd

Last updated July 2022