FY24

Modern Slavery Statement

THIS STATEMENT IS PREPARED ON BEHALF OF **TOURISM HOLDINGS LIMITED** (REGISTERED AS A FOREIGN ENTITY IN AUSTRALIA AS TOURISM AUSTRALIA RENTALS LIMITED) AND THE ENTITIES LISTED AT APPENDIX E (THL).

Acknowledgement

thl acknowledges the Indigenous Peoples of the lands on which we operate, and we pay our respects to their Elders, past and present. We recognise their enduring ancestral connection to our lands, waters and skies.

Our role

At a global level, ***thl*** is on a journey to build our cultural capabilities, specifically the skills, knowledge, behaviours and protocols required to deliver products and services in a culturally respectful, genuine and appropriate manner.

CONTENTS

Foreword	4
FY24 key achievements	4
1. ABOUT THIS STATEMENT	**5**
Reporting Entity	5
Consultation	5
Approval by principal governing body	5
How ***thl*** creates value	5
Our Future-Fit Sustainability Journey	6
2. OUR OPERATIONS, STRUCTURE & SUPPLY CHAIN	**7**
Our Operations	7
Our Organisational Structure and Governance	8
Our Approach	8
FY24 Supply Chain Analysis	9
3. IDENTIFYING MODERN SLAVERY RISKS	**11**
Industry Risk Factors	11
Risk Methodology	11
Prioritised Risk Areas	12
Operational Risk	12
Supply Chain Risk	12
4. ADDRESSING AND MITIGATING RISK	**13**
Goal Progress	13
Managing Risks	14
Case Study	14
5. MEASURING EFFECTIVENESS	**15**
Actions For FY25	15
6. APPENDICES	**16**
Appendix A - Disclaimers	16
Appendix B - Policies	16
Appendix C - Internal Accountability	16
Appendix D - Enterprise Risk Management	17
Appendix E – Material trading entities within the Tourism Holdings Limited Group	17
thl *SpeakUp*	18

Foreword

I am proud to present ***thl***'s FY24 Global Modern Slavery Statement, marking our second year of reporting.

Our commitment to sustainable procurement and taking positive action against modern slavery is reflected in our changing business practices and progress on actions in our *Thrive* anti-modern slavery Roadmap.

This Statement highlights the progress we have made in FY24, but we recognise that important work is ongoing due to the complexity of our supply chain and the continued prevalence of people globally who are caught in modern slavery.

Five years ago, we committed to becoming a future-fit business. Our 23 science-based sustainability goals base on the mindset and methodology of the Future-Fit Business Benchmark have driven meaningful improvements in our operations. Of the Break-Even (BE) goals that have guided our efforts to enhance human rights at ***thl***, two are particularly relevant to this Modern Slavery Statement:

- BE04 Procurement safeguards the pursuit of future-fitness (a priority goal for ***thl***)
- BE20 Business is conducted ethically

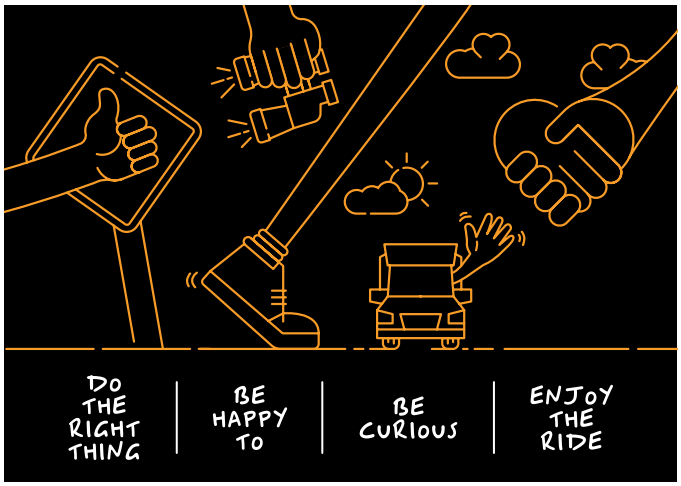
FY24 KEY ACHIEVEMENTS

In FY24, we focused on improving the number and geographic spread of suppliers we assessed for modern slavery risk. In FY23 we focussed on the top 50 suppliers to our New Zealand business, rated by spend. In FY24, of the regional spend assessed we have conducted risk assessments of 166 of our global suppliers. This has provided us with a better understanding of the risks of modern slavery within our supply chain however we have more work to do to increase the number of suppliers assessed.

I'm pleased with the progress we have made this year, with key achievements including:

- ✓ Ongoing implementation of our five-year Global Sustainable Procurement Framework, with level 3 'Practice' completed in FY24.
- ✓ Progressed the first year of executing our *Thrive* Roadmap, taking significant steps to improve our organisational approach to addressing modern slavery risks.
- ✓ Updating our Code of Ethics to reflect the expectations we have of our crew, suppliers and stakeholders in a changing global context.
- ✓ There are now over 100 suppliers in our register who have signed our Supplier Code of Conduct (SCOC) self-assessments. The SCOC has been updated to better protect against risks of forced labour in Xinjiang Province, China.
- ✓ Modern slavery risks discussed as a regular agenda topic at the Global Sustainable Procurement Group monthly meetings.
- ✓ Updated the future-fit hotspot analysis of our main supplier categories to better assess modern slavery risks.

thl'S PURPOSE IS TO CREATE UNFORGETTABLE JOURNEYS AND OUR VALUES ARE:



Our value ***Do the right thing*** corresponds to our commitment to preventing modern slavery within our supply chain. It is important to acknowledge we are on a maturity journey and have some way to go before we are confident that we have addressed the risk of modern slavery from our supply chain.

We welcome any feedback to improve our practices at: governanceandethics@thlonline.com.

Sincerely,

Grant Webster
CEO

1. ABOUT THIS STATEMENT

This is ***thl***'s second year publishing a modern slavery statement. ***thl***'s Modern Slavery Statement covers the reporting period of 01 July 2023–30 June 2024 (FY24). For the purposes of this Modern Slavery Statement, we have researched 166 tier one 'direct' suppliers and analysed a combined regional supplier spend of approximately $290 million[1]. This Modern Slavery Statement is made on behalf of all business entities within ***thl*** listed at Appendix E.

REPORTING ENTITY

Tourism Holdings Limited (***thl***) (NZBN: 9429045975592 and ABN: 38 898 280 994) is a leading interconnected global operator in the Recreational Vehicle (RV) industry with comprehensive integration across build (manufacturing), rental and sales segments together with New Zealand tourism businesses. First established as The Helicopter Line, ***thl*** is a public company listed on the NZX and ASX, trading under the ticker code THL.

thl is a global business and falls within modern slavery reporting requirements in Australia, Canada, the United Kingdom and the United States. We recognise these reporting requirements and have crafted this global statement with the aim of meeting the legislative requirements in each jurisdiction. ***thl*** recognises that the maturity of modern slavery risk management at ***thl*** and reporting will continue to evolve over time.

Modern slavery risk profiles differ across ***thl*** business units, leading ***thl*** to adopt tailored approaches for identifying, mitigating, and remediating these risks within a common framework. For instance, our risk assessment indicates there are greater risks of modern slavery within the automotive industry than the tourism industry therefore our current focus, reflected in this Statement, is on the automotive business.

CONSULTATION

Since the ***thl*** merger in November 2022 with Apollo Tourism & Leisure, work to align internal procurement processes has been underway. The Global Sustainable Procurement Group (GSPG) has played an important role in improving processes and sharing learning and experience.

The Responsible Management (RM) team led the drafting of this Statement, consulting with the GSPG. The RM team is responsible for the global future-fit sustainability programme and the Enterprise Risk Management (ERM) framework. The GSPG comprises internal procurement stakeholders from across ***thl*** global operations and business units. The group meets monthly to drive implementation of our Flexible Framework sustainable procurement actions which include managing risks relating to modern slavery.

We welcome any suggestions or comments on this Statement to help us improve our transparency and accountability. Please reach out to us at governanceandethics@thlonline.com. Alternatively contact Juhi Shareef, our Chief Responsibility Officer, at juhi.shareef@thlonline.com.

Hamilton Locke reviewed this Statement for compliance with Australian reporting requirements. The management-level Governance and Ethics Committee (GEC) endorsed the final Statement.

APPROVAL BY PRINCIPAL GOVERNING BODY

This Modern Slavery Statement is approved by the ***thl*** Board (the principal governing body and higher entity of each reporting entity listed at Appendix E).

Cathy Quinn
CHAIR

[1]Figure excludes internal costs and is based on procurement from our operations in New Zealand, Australia, United States, Canada, UK and Ireland during the twelve months from 1st June 2023 – 31st May 2024.

How *thl* creates value

thl's Value Creation Model illustrates how we generate value across all our business activities and our Build/Buy–Rent–Sell business model. By adopting a science-based, 'future-fit' approach, we can more effectively address challenges and create value, not only for ourselves, but also for the broader systems in which we operate.

OUR RESOURCES

FINANCIAL
Our investors and access to capital

OUR CREW
Our talented crew and commitment to our core values

RELATIONSHIPS
Our partners, industry relationships and community connections

NATURE
The natural resources, ecosystems and destinations on which we depend

KNOWLEDGE
Our knowledge, skills and RV expertise from our vertically integrated build/buy-rent-sell model

INFRASTRUCTURE
Our multinational operations, facilities and equipment

Our global systems and technology

BUSINESS MODEL

OUR PURPOSE
Creating unforgettable journeys

OUR VALUES
Do the right thing
Be curious
Be happy to
Enjoy the ride

OUR IMPACTS AND OUTCOMES

- Revenue, growth and financial returns.
- Worldwide, world-class RV products and services.
- Guest travel and tourism experiences.
- Vertically integrated, multinational global RV business.

- Crew engagement and wellbeing.
- Healthy and safe workplaces.
- People Promise to provide the tools, skills and identity to succeed.
- Fostering a diverse and inclusive culture.
- Building our cultural capability.

- Deep connections in tourism and RV industry.
- Social licence to operate at our sites and where products are used.
- Responsible travel partnerships and programmes in each region.
- Working with suppliers to improve supply chain transparency, risks, sustainability performance and circularity.

- Climate impacts and carbon emissions from our fleet and operations.
- Transition plan to address climate-related risks and opportunities.
- Impacts of our products in communities and destinations guests visit.
- Promoting regenerative travel that positively impacts destinations.
- The sensitive ecosystems in which we operate in Waitomo, New Zealand.
- Resources used by our fleet and operations – fuel, energy and water – and the emissions and waste our activities generate.

- New fleet, technology, product design and development innovation.
- Action to address our greatest climate and carbon challenge – the emissions from our vehicle fleet.
- Strong, long-term supplier relationships in RV and tourism sectors.
- Complex global supply chain has social, environmental and economic impacts.

- Global network of sites and infrastructure expanded manufacturing facilities, equipment and operations.
- Future-Fit Branch Action Plans to manage impacts of water, energy, waste and emissions, and positive impacts on communities as well as congestion and potential impacts from freedom camping.
- Technologies and systems to manage complexity and growth.

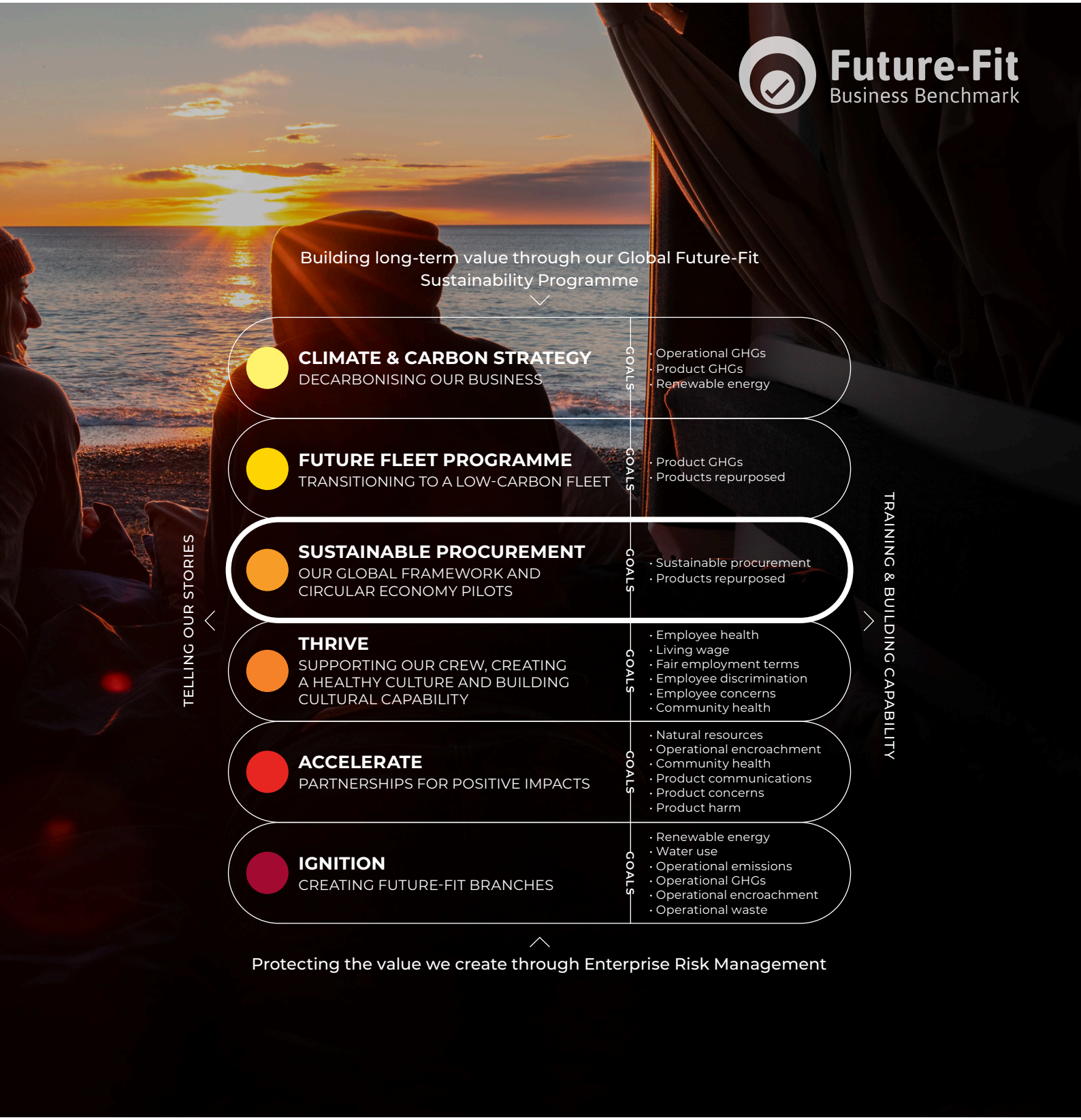
ACTIVE GOVERNANCE AND RISK MANAGEMENT

Our Future-Fit Sustainability Journey

It has been five years since ***thl*** first made a commitment to becoming a future-fit business. We have made substantial progress on our Global Future-Fit Sustainability Programme (see diagram), which helps crew embed sustainability into projects and daily decision-making.

A key part of our Sustainable Procurement Programme has been the roll-out of our Supplier Code of Conduct, related Self-Assessment form and access for suppliers to our anonymous platform to report ethical breaches (this includes international freephone numbers). See: thlonline.com/suppliers for more information.

For an overview on progress we have made towards our 23 Break-Even goals of the Future-Fit Business Benchmark please see page 38 of our FY24 Integrated Annual Report and our sustainability website: thlsustainability.com.



2. OUR OPERATIONS, STRUCTURE & SUPPLY CHAIN

Our Operations

thl is the largest commercial RV operator in the world, a multinational, vertically integrated RV manufacturing, rental and retail business for motorhomes and campervans and the sale of towables such as trailers and caravans. Additionally, ***thl*** delivers tourism experiences through our entities, Kiwi Experience and Waitomo Caves. Our Build/Buy-Rent-Sell model and global footprint reflects the strong expansion of the business and positions ***thl*** positively for the future as a world-class leader in the RV space. For this Modern Slavery Statement, we are focussing on automotive rather than tourism risks as our assessment indicates there are greater risks of modern slavery within the automotive industry.

Diagram : Global Footprint

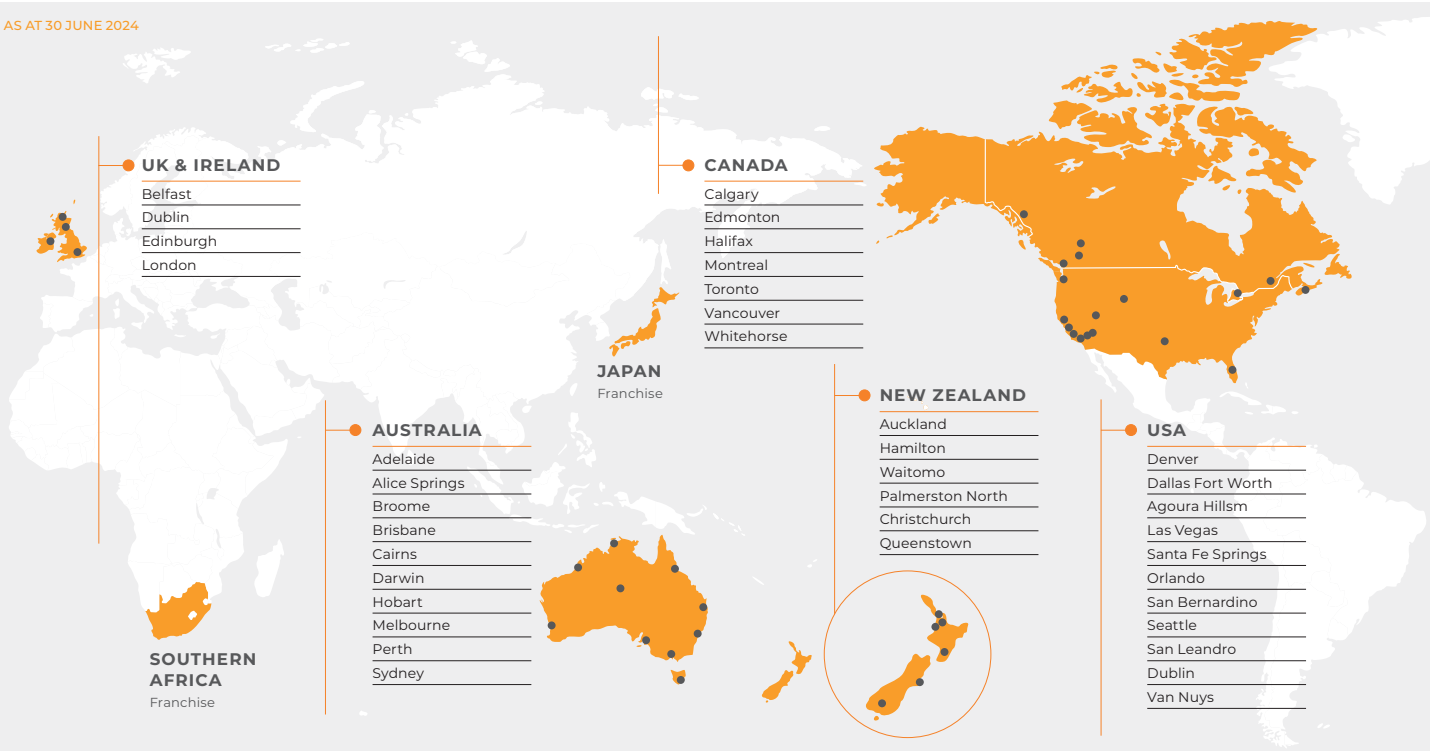


*Diagram : A snapshot of **thl** global brands, locations and crew*

thl

thl New Zealand

BRANDS	LOCATIONS	CREW
23	14	983

thl Australia

BRANDS	LOCATIONS	CREW
19	19	764

thl USA

BRANDS	LOCATIONS	CREW
5	12	325

thl Canada

BRANDS	LOCATIONS	CREW
1	7	270

thl UK & Ireland

BRANDS	LOCATIONS	CREW
4	4	157

Crew: number of employees including casual staff, as of 30 June 2024.

Our Organisational Structure and Governance

Governance and oversight of modern slavery risks are provided by the ***thl*** Board level and are firmly rooted in our Code of Ethics, found in the Corporate Governance section of our website: www.thlonline.com.

At management level, governance is provided by the Governance & Ethics Committee (GEC) comprising our CEO, CFO, Chief Responsibility Officer, Chief People & Transformation Officer and Company Secretary as well as relevant regional COOs.

Our approach to manage modern slavery risks is an integral part of ***thl***'s global sustainability programme and is fully endorsed by the Executive Team, GEC, and the ***thl*** Board. For an overview of the ***thl*** organisational structure, please see p128-130 of our FY24 Integrated Annual Report.

*Diagram : **thl** organisational structure*

Our Approach

thl is a diverse company from vehicle manufacturing to tourism services and our supply chain is large, complex and multi-tiered and multinational.

While in FY23 our modern slavery analysis focussed solely on procurement in New Zealand, in FY24 we have aimed to get a global overview of our spend on invoiced product and service suppliers. We have taken a 'regional scan' approach covering procurement from our operations in New Zealand, Australia, United States, Canada, UK and Ireland. The combined regional supplier spend analysed for this FY24 modern slavery analysis was approximately $290 million[2].

In this our second year of reporting we recognise that we are still at early stages of the journey on supply chain visibility, data gathering and analysis. As a merged business we have been moving forward at pace to develop and implement system improvements to bring all our global operations onto common systems across a number of business areas. This will support data gathering and analysis for future reporting.

Please see our FY24 Integrated Annual Report for more information.

While manufacturing, rentals, and retail business units share similar suppliers, each business unit purchases a range of different items. ***thl*** has over 8,000 tier one 'direct' suppliers producing products and providing services from more than 20 countries.

Our supply chain is made up of a wide range of product and services. To summarise our supply chain, we have grouped the products into nine categories:

*Diagram : **thl** supply chain categories*

OEM/Vehicles	• Supplier's who produce components that make up a new vehicle. This is primarily used in our Manufacturing and Rental business units.
RV Appliances	• This includes appliances that are used in the house of our RVs. This includes, refrigerators, diesel heaters, cook tops, etc.
RV Equipment	• RV Equipment is the living equipment that are the kits which are used for our customers in our rental fleet. This includes, bedding, kitchenware, cooking utensils, etc.
RV Parts	• RV Parts are made up from items like tyres, batteries, windscreens, etc.
RV Services	• Services purchased to support vehicle repairs, panel and paint, detailing, and driving.
Consumables	• Purchased to support operations with fuel, oil, cleaning products, etc.
Freight Transport	• Supporting our operations by transporting goods to and from ***thl*** branches.
Professional Services	• Services purchased to support our operations which includes insurance, industry bodies, tax, travel agents, recruitment agencies, etc.
Property	• Property expenses including rent, maintenance, and utilities.

[2] Figure excludes internal costs and is based on the twelve months from 1st June 2023 – 31st May 2024.

FY24 SUPPLY CHAIN ANALYSIS

We are committed to providing accurate data, and given our extensive list of suppliers, this process requires time. In the FY23 Statement we undertook an external assessment by pre-merger spend on our top 50 tier one 'direct' (suppliers who directly provide products or services to ***thl***) and where possible tier two 'indirect' suppliers in New Zealand only.

For this year's Modern Slavery Statement, we researched 166 tier one 'direct' suppliers, globally. The aim of this research was to identify risks of modern slavery in the country of origin for the products and services procured. This research was conducted with the assistance of the Global Sustainable Procurement Group, the ***thl*** finance team and third-party consultancy.

METHODOLOGY

thl is a global company and operates using multiple currencies. For this Modern Slavery Statement, the spend data from different regions was converted into NZD. The suppliers analysed were categorised into nine different groups of our supply chain (as seen above). To determine the countries where our suppliers manufacture goods for ***thl***, we utilised a combination of desk-based research and input from procurement teams across relevant business units. This data was taken to a third-party consultancy for a risk assessment. Where internal data on country of manufacture was not available, the consultancy made assumptions based on an understanding of the category risk profile.

Suppliers were assessed by using the following methodology:

Diagram : risk assessment methodology

To align with international good practice, the United Nations Standard Products and Services Code® (UNSPSC®) was used to further categorise ***thl***'s spend data into 17 segments, 33 families, 38 classes and 45 commodities. The risk assessment looked at country risk, category risk, direct supplier risk, and indirect supplier risk.

ASSESSING SUPPLIERS

Suppliers were classified into high, medium, or low depending on the level of risk associated with the country (the estimated prevalence of population in modern slavery i.e., victims per 1,000) and category (the percentage of commodities imported from high-risk countries). For more details please see our FY23 Modern Slavery Statement page 10.

RISK ANALYSIS

As seen in Graph 1, the majority of our suppliers assessed are manufacturing or producing products and services in Asia and the Pacific. Globally, 15 countries of manufacture are considered a low risk (green), 14 countries are considered a medium risk (orange), and one country (Samoa) has an unknown risk rating as there is no data available. None of the countries where our tier one 'direct' suppliers manufacture or produce goods and services is considered a high risk for modern slavery. Direct tier one suppliers to ***thl*** carry a combination of low (61%) and medium (38%) risk of modern slavery as shown in Graph 2. However, 38% of suppliers beyond tier one (indirect suppliers sitting further down the supply chain) are considered to have higher risks of modern slavery, please refer to Graph 3. These higher risk suppliers primarily provide Original Equipment Manufacturer (OEM) vehicle chassis, RV parts, equipment, and appliances to ***thl***.

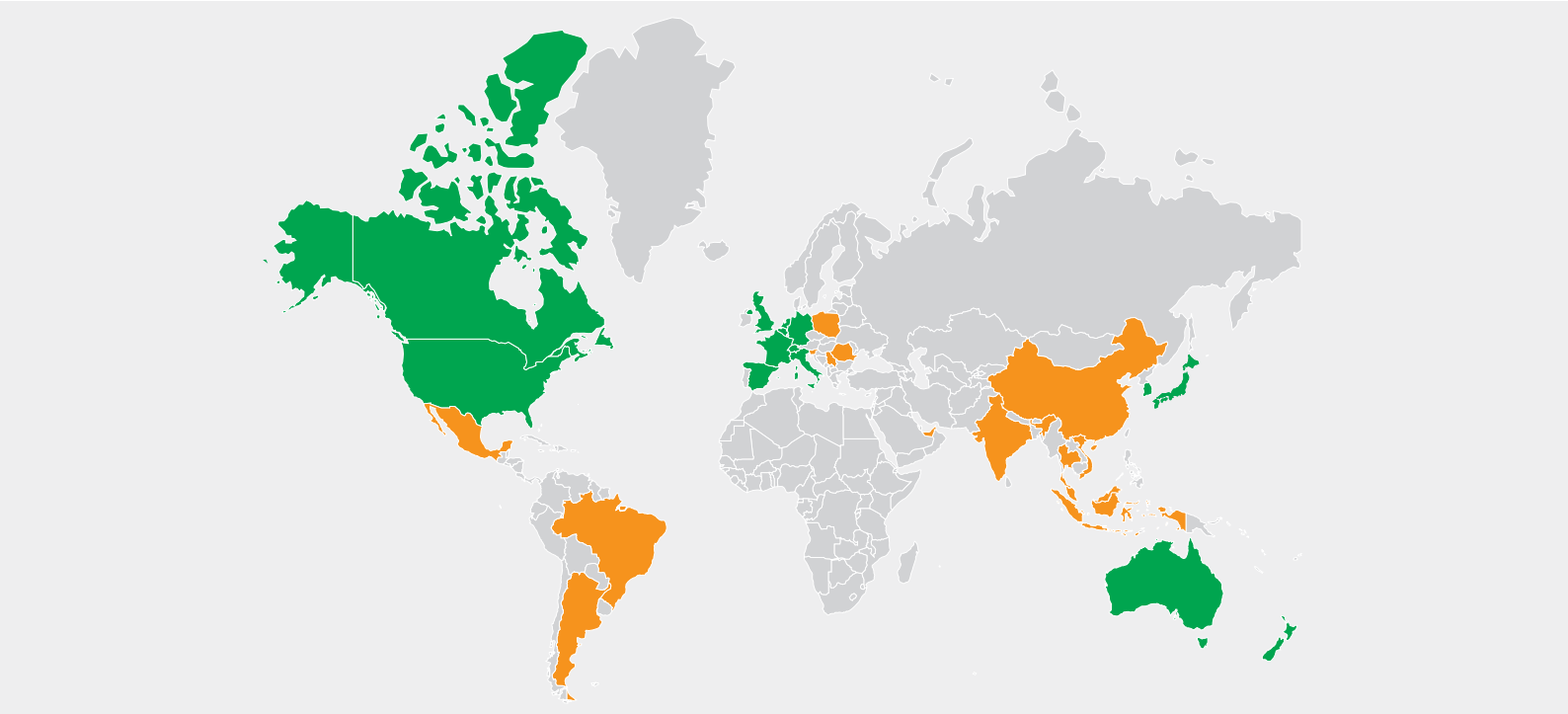
Australia and New Zealand have the greatest proportion of high-risk 'indirect' suppliers among all ***thl*** regions as depicted in Graph 4. ***thl*** Australia and New Zealand operate manufacturing facilities for assembling motorhomes, ambulances, and trucking trailers. Given the nature of manufacturing and the risks around e.g. mining of raw materials, this elevated risk in Australia and New Zealand was anticipated.

thl categorises potential modern slavery risk factors into two main groups: risks of modern slavery in our operations ('operational risks') and risks in our supply chain ('supply chain risks'). Graph 5 shows our percentage of spend (of the regional scan spend analysed) by these two risk categories.

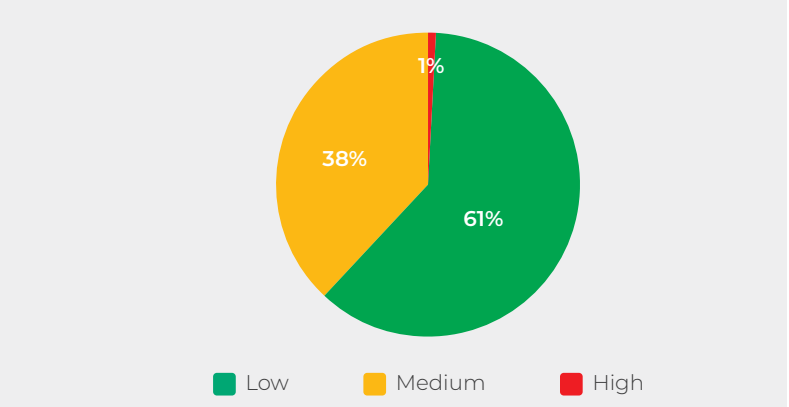
OTHER KEY INSIGHTS

- More than 90% of tier one suppliers to ***thl*** are considered to be from low-risk countries and 9.6% are from medium-risk countries.
- The manufacturing of vehicles, parts, and equipment represents the largest percentage of assessed category risk (43.37%). These risks may be found in the production or supply of raw materials beyond tier one suppliers.
- The primary suppliers considered as medium-to-high risk are those who provide services to ***thl*** in relation to transportation, logistics and recruitment.
- Australia, New Zealand, and the United States are assessed as having the highest exposure to modern slavery risks within the ***thl*** supply chain.

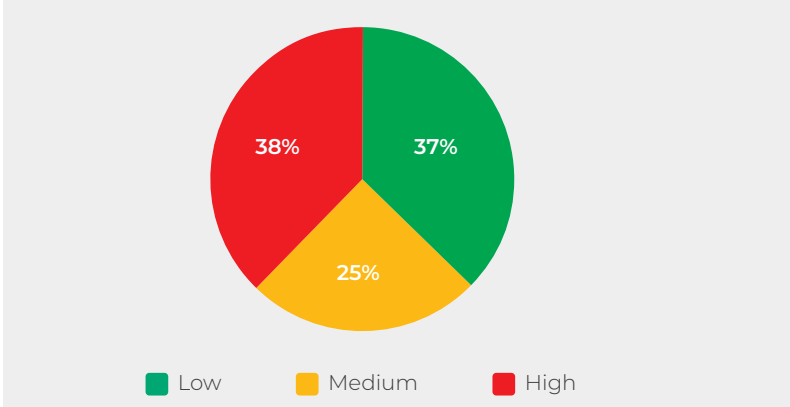
*Graph 1 : Country of manufacture of **thl**'s tier one suppliers*



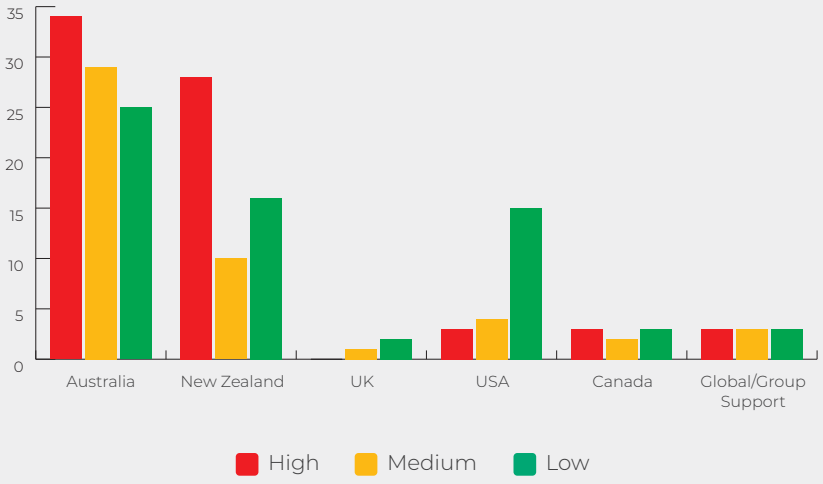
*Graph 2 : **thl** tier one supplier risk*



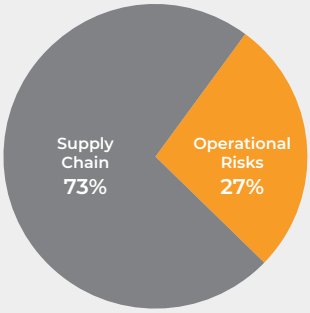
*Graph 3 : **thl** supplier risk, beyond tier one*



*Graph 4 : Risk comparison of beyond tier one supplier by **thl** region*



Graph 5 : Spend (of regional scan spend analysed) Percentage by Risk Category



3. IDENTIFYING MODERN SLAVERY RISKS

Industry Risk Factors

1 Workforce vulnerability

Including:

- Low skill or manual labour with a high prevalence of temporary, seasonal, or irregular work, leading to an increased risk of exploitative practices
- Prevalence of migrant workers within a sector may also increases the risk of practices such as debt bondage and visa exploitation

2 Business models that increase risk to people

Including:

- Reliance on the engagement of hired contractors which decreases visibility over the wages and working conditions of people employed to deliver services
- Temporary workforce requirements, often in isolated areas, increases the risk of exploitative activities
- Prevalence of intense price pressures exerting downward pressure on wages and labour conditions

3 Procurement of high-risk categories of goods

Including:

- Industries and sectors that have been identified as connected to 'state forced labour'
- Products with high-risk raw materials or component parts based on known and documented incidences of modern slavery

4 Sourcing from high-risk geographies

Including:

- Goods and services originating from countries that have higher risk of modern slavery prevalence due to conflict, weak rule of law, corruption, or state failure
- Countries that have been identified as using 'state forced labour'

5 Complex and opaque supply chain

Including:

- A lack of transparency or visibility of tiers within supply chains increasing the likelihood of undetected exploitation
- Increased possibility of suppliers outsourcing portions of work to subcontractors that violate labour rights

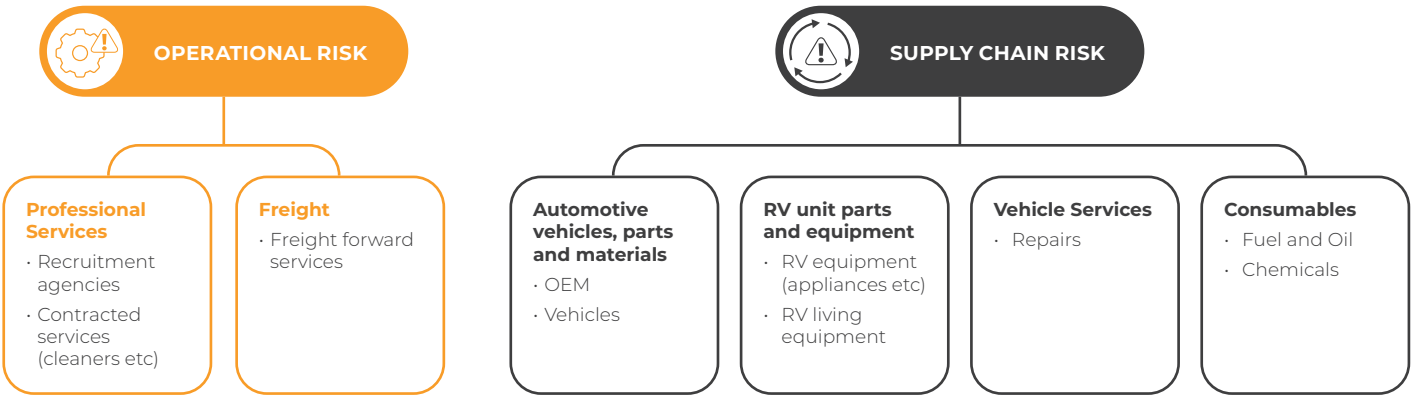
Risk Methodology

In FY24, we reviewed our hotspot analysis by category to consider modern slavery risks. Please refer to our FY23 Modern Slavery Statement on page 13 for more information on the risk methodology.

Prioritised Risk Areas

The following categories have been updated in FY24 to reflect where increased potential for risk factors exist within our **operations** and **supply chain**.

Diagram : Risk categories



OPERATIONAL RISK

The operational risks of modern slavery among our tier one suppliers are considered to be generally low. However, certain categories are assessed as presenting medium to high risks. Specifically, recruitment agencies and freight services have been identified as high-risk areas due to the potential for sub-contracting, which increases the risk of modern slavery. The operational risk categories are listed above, and we have been making progress in addressing these areas

- Freight was not previously considered a risk in our FY23 Modern Slavery Statement. However, with the expansion of our data from suppliers in New Zealand to our global suppliers, it has now been identified as an operational risk.
- We are on track for reviewing and monitoring engagement with contractors (e.g. cleaners) to see that our practices are ethical. New suppliers are required to sign a self-assessment and commitment to our Supplier Code of Conduct.
- ***thl*** Australia have recently changed detailing contractors at one of their branches. Managing modern slavery risks was a core consideration of the decision-making process. ***thl*** will continue to seek to partner with suppliers who share similar values and standards as us.
- Following the merger, ***thl*** Australia reviewed and updated contracts for sub-contracted drivers. To guarantee accuracy and compliance, we engaged a legal team throughout the process.

If you would like to know further about our operational risks, please see p14-15 of our FY23 Modern Slavery Statement.

SUPPLY CHAIN RISK

The majority of our tier one suppliers that we assessed posing supply chain risks are classified low to medium risk. Higher risks of modern slavery are considered to be further down the supply chain of Automotive vehicles, parts, and material; RV unit parts and equipment; Vehicle services; and Consumables. Listed below we have outlined the progress we have made addressing these risks.

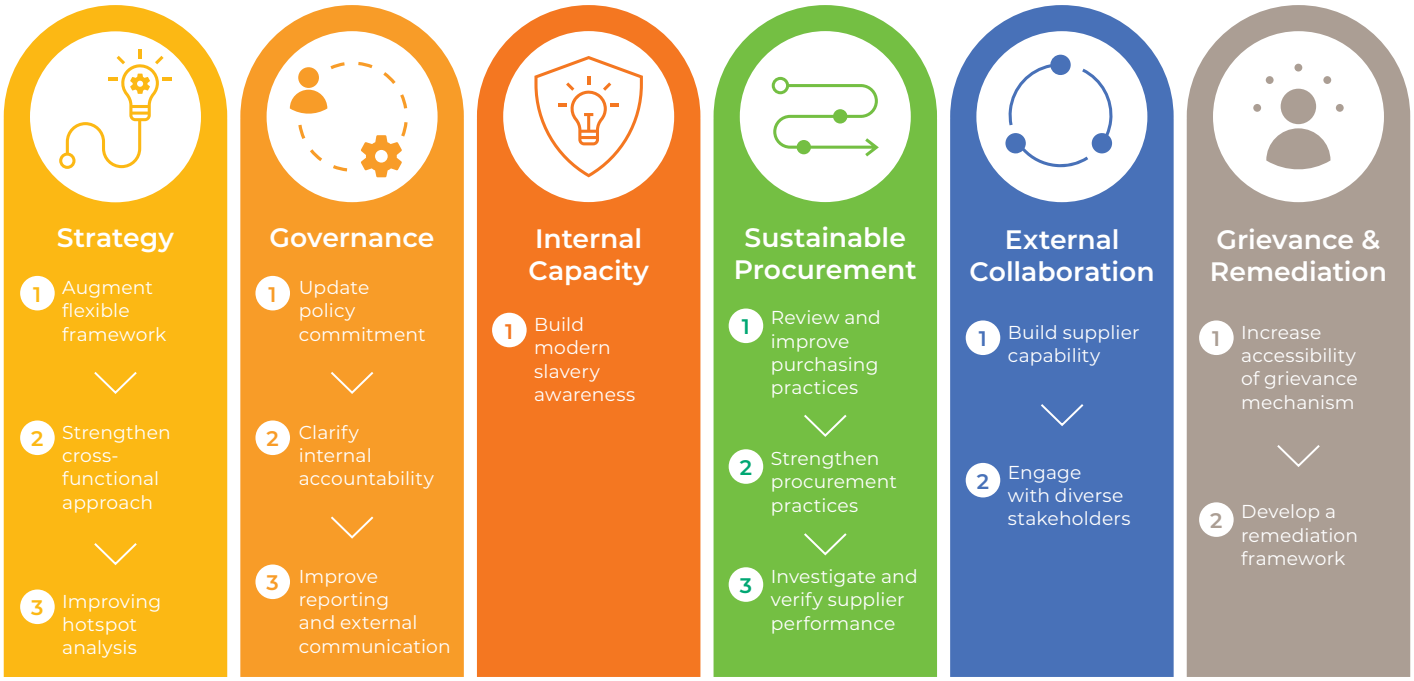
- Future-fit hotspot analysis has been reviewed by category which includes OEM vehicles, RV parts, RV equipment, etc.
- By identifying the locations where our suppliers manufacture goods for ***thl*** in the risk assessment, we have been able to prioritise suppliers who we assess as being at risk of modern slavery within our supply chain. This has led us to the next step: engaging in conversations with these suppliers. Additionally, we aim to extend our review beyond tier one suppliers.

If you would like to know further about our operational risks, please see p15-16 of our FY23 Modern Slavery Statement.

4. ADDRESSING AND MITIGATING RISK

Our commitment to addressing and mitigating modern slavery risks is deeply rooted in our values and future-fit goals. In FY23, we developed the *Thrive* Implementation Roadmap, which has been instrumental in guiding us to effectively tackle these risks. This Roadmap helps ***thl*** address and mitigate modern slavery risks through practical processes, enhanced internal capabilities, and robust external collaborations. To get a better understanding of the six pillars of our organisational approach please refer to page 17 in our FY23 Modern Slavery Statement.

Diagram : Thrive Implementation Roadmap



Goal Progress

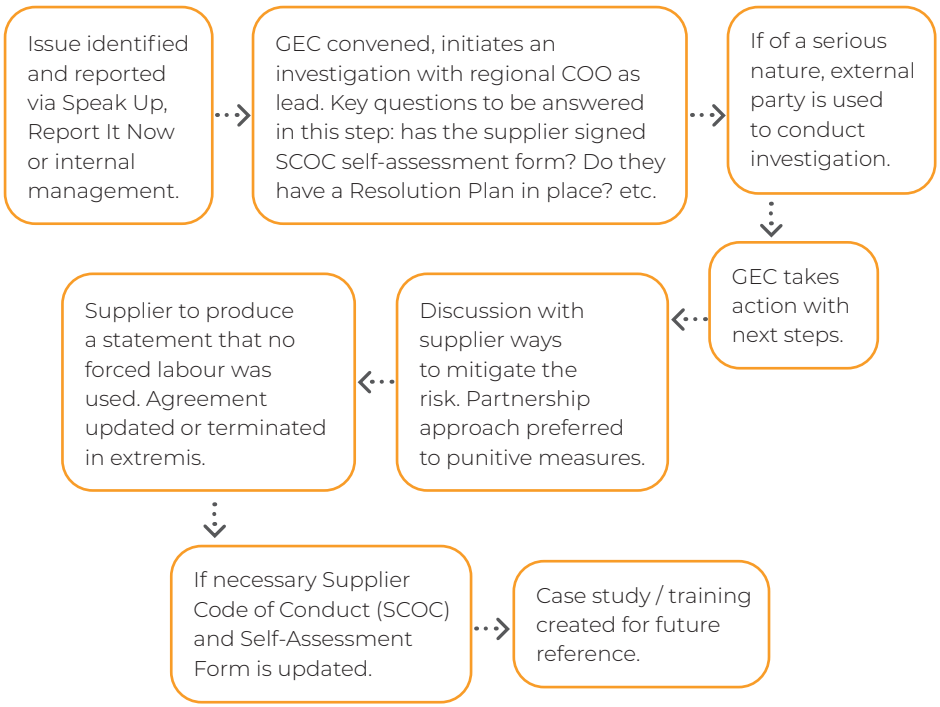
Under each pillar is a set of goals we aim to achieve by FY26, aligned with our Sustainable Procurement Flexible Framework. Below is an update on progress we made towards each goal in FY24.

Goal		Status	FY24 Progress
	1. Augment ***thl*** Flexible Framework	Completed	We have embedded relevant actions within the pillars of the ***thl*** Sustainable Procurement Flexible Framework.
		Completed	Modern Slavery is a regular agenda topic in the GSPG. Supplier hotspots, modern slavery risks, and data collection are some of the main points of conversation in these meetings.
		Completed	Our knowledge of risk in each category is always growing and we have updated training materials to reflect the growth of knowledge.
	2. Strengthen cross-functional approach	Completed	Throughout FY24 we reviewed our Future-Fit Hotspot Analysis, working our way through our supply chain categories. These hotspot analyses were shared with the GSPG.
	3. Improve future-fit supplier hotspot analysis	Ongoing	We have updated Future-Fit Hotspot Analysis for our main supplier categories to capture modern slavery risks. In FY25 we will be progressing Hotspot Analysis of suppliers further down our supply chain.
	1. Update policy commitment	Completed	The relevant policies have been updated to reflect our maturing approach to modern slavery and human rights; this is a continual process. Our Code of Ethics has been updated, we have a new Governance & Ethics Committee (GEC) Charter and modern slavery risk management processes. See appendix B for more detail. We have updated our Supplier Code of Conduct (SCOC) to address the identified risks within our supply chain (see the Case Study below).
	2. Clarify internal accountability	WIP, due by end FY25	Risks are identified through our Enterprise Risk Management (ERM) framework which seeks to manage risks at all levels of the organisation. If a modern slavery risk occurs, depending on the category of risk, it will be escalated to three groups. These groups are the GSPG, Responsible Management (RM) team, and if required, the GEC whose accountability has been clarified in a new Charter. See appendix C and D for more detail.
	3. Improve reporting and external communication	WIP, due by end FY25	As shown in the risk assessment we have gathered data using a 'regional scan' approach for FY24 to provide a better global overview. This will help us better identify areas of focus.
		Completed	We have clarified the internal reporting procedures in the updated Code of Ethics. See a summary under Managing Risks.
		Completed	In this Statement we have outlined the risks in our supply chain and created steps in our Thrive Roadmap to mitigate them.
		Completed	Modern slavery has been communicated in external communications such as our SCOC and thlsustainability.com website.

Goal		Status	FY24 Progress
	1. Build modern slavery awareness	Ongoing	***thl*** has implemented modern slavery awareness training for key roles as part of our sustainable procurement training. For instance, the Responsible Management team has provided trained to the GSPG on identifying and addressing supply chain hotspots and to ***thl*** leaders on sustainable procurement including modern slavery risks.
	1. Review and improve purchasing practices	WIP, due by end FY25	We continue to make progress on aligning our procurement processes since our merger in November 2022. Please see our FY24 Integrated Annual Report.
	2. Strengthen procurement practices	WIP, due by end FY25	Our procurement practices are under constant review. After the merger in 2022 there has been a combined effort to improve our systems across the business to make each region more connected. See page 31 of our FY24 Integrated Annual Report. More work is being done to refine our suppliers globally.
		Ongoing	We have started engaging with tier one suppliers to understand and address barriers of modern slavery. In FY24, a number of our senior leadership team and directors visited ***thl*** tier one suppliers in China, gaining valuable insight into their operations. In FY25, supplier engagement will be an ongoing focus, with an aim to understand impacts beyond tier one.
		Ongoing	We have been building awareness of high-risk products and services we purchase with our GSPG, what signs to look for and the actions to take if you see these signs.
		Completed	We have improved data gathering, as detailed in Section 3. For FY25, we plan to expand our data collection efforts further.
		WIP, due by end FY25	A contractual clause bank for high-risk and high-spend suppliers is in the process of being developed.
		Ongoing	Suppliers who have signed our Supplier Code of Conduct equate to 33% of our regional scan spend analysed in FY24. We will continue rolling out the SCOC to increase the number of suppliers who have signed the self-assessment.
	3. Investigate and verify supplier performance	Not started	This goal is dependent on completing other goals first. In our Thrive Roadmap timeline this goal is scheduled for FY26.
	1. Build supplier capability	WIP, due by end FY25	We regularly review our policies and our SCOC. Our aim is to continue to build supplier capability using the SCOC as a key tool for engagement.
	2. Engagement with diverse suppliers and stakeholders	WIP, due by end FY25	Supplier engagement is a key goal in this framework. To achieve this, we are considering hosting training sessions with key suppliers about modern slavery risks and sustainability innovation. For more information about our work in diversity see www.thlsustainability.com/thrive.
	1. Increase accessibility of grievance mechanism	Completed	We have made our 'Speak Up' communication platform (including confidential and anonymous international options) available online. You can view here www.thlsustainability.com/suppliers. Further development of this goal is a focus for FY25.
	2. Develop a remediation framework	Completed	Governance & Ethics Committee members established protocols to escalate any grievances that indicate serious exploitation including outlining roles, responsibilities, and timeframes.

Managing Risks

As we strive towards a more transparent and visible supply chain, ***thl*** is dedicated to managing associated risks. Below is an overview of the steps we take to address reported risks. The Governance and Ethics Committee (GEC) and the Chief Operations Officer (COO) of the respective region play crucial roles in this process.



Case Study

During the procurement of our new uniforms, and despite our supplier having signed our Supplier Code of Conduct, we had a high potential near miss. One garment was suspected to have been produced using forced labour through an indirect supplier. Fortunately, a thorough investigation revealed this was not the case. Following this high potential near miss, we obtained a statement from the factory confirming that no forced or child labour was involved in the production of these uniforms. We then made necessary changes to the Supplier Code of Conduct to prevent such issues in the future. The supplier factory will be subject to an in-person audit by the NZ-based supplier.

5. MEASURING EFFECTIVENESS

We are on a maturity journey identifying our modern slavery risks. For FY25 we are supporting supply chain traceability by taking measures to increase transparency this may include supplier collaboration, enhancing data collection and implementing training for key crew members.

Actions for FY25

Goal		Implementation Roadmap Actions
	Goal 2: Strengthen cross-functional approach by continuing to update hotspots	Expand our hotspot analysis range to include internal and external stakeholders
	Goal 3: Improving hotspot analysis	Create a gaps and opportunities report following the risk assessment done by external third-party consultancy
	Goal 2: Clarify internal accountability	Outline operational responsibility and develop KPIs associated with relevant internal roles
	Goal 2: Build modern slavery awareness	Developing training for key crew members. This training will clearly define modern slavery, its indicators, obligations, and appropriate responses
	Goal 2: Strengthen procurement practices	Design practical and consistent procurement processes that support embedding sustainability. To enhance engagement with longstanding suppliers to evaluate controls and introduce anti-modern slavery conditions
	Goal 1: Build supplier capability	Consider training sessions for suppliers and other business relationships based on any feedback or needs identified
	Goal 1: Increase accessibility of grievance mechanism	Monitor the remedy of grievance and report on trends related to human rights

6. APPENDICES

Appendix A - Disclaimers

- ***thl*** disclaims all responsibility and liability (including without limitation for any direct or indirect or consequential costs, loss, or damage or loss of profits) arising from anything done or omitted to be done by any party in reliance, whether wholly or partially, on any of the information contained in in this Statement.
- This Statement may contain forward-looking statements including ***thl***'s intent, belief, goals, objectives, initiatives, commitments or current expectations. These are not statements of fact and are based on ***thl***'s good faith assumptions of the financial, market, risk, regulatory and other environments that may influence ***thl***'s operations in the future. ***thl*** does not undertake any obligation to publicly update or revise any forward-looking statements, whether as a result of new information or future events.

Appendix B - Policies

Name	Description
Code of Ethics	Our Code of Ethics is intended to reinforce our commitment to the community, including our employees and shareholders. This code outlines the standards of behaviour that the community can expect from us.
Sustainable Procurement Policy*	Outlines our dedication to enhancing sustainability performance in procurement process.
Enterprise Risk Management (ERM) Policy*	The ERM policy outlines our approach to embed risk management into our decisions, processes, and operations through our ERM Framework.
Speak Up Policy*	This policy explains how individuals from ***thl*** or one of our suppliers can raise concerns about suspected misconduct or wrongdoing in confidence and without fear of retaliation. It also describes what can be expected from ***thl*** if and individual decides to 'Speak Up'.
Supplier Code of Conduct (SCOC)	To effectively manage supply chain risks, including modern slavery, our Supplier Code of Conduct sets clear sustainability expectations for suppliers while acknowledging that ***thl*** is also on a journey towards improvement. Free resources are provided to help suppliers with each clause.

*Not available on ***thl*** websites

Appendix C - Internal Accountability

Name	Description
Governance and Ethics Committee (GEC)	The role of GEC is to respond to any concerns raised by employees around modern slavery risks. The committee also provides guidance on both management and investigative, of all disclosures/submissions received that include Modern Slavery indicators. Core members of the Committee are the Chief Executive Officer, Chief Financial Officer, Chief Responsibility Officer, Chief Transformation Officer and additional Chief Operations Officers relating to the relevant region or business area.
Responsible Management Team	The internal team responsible for seeing that our *Thrive* Implementation Roadmap is operationalised across the relevant regions and business units.
Global Sustainable Procurement Group (GSPG)	A group of internal procurement stakeholders representing the key jurisdictions in which we operate: New Zealand, Australia, United States, Canada, United Kingdom. The group is responsible for implementing our sustainable procurement strategy.

Appendix D - Enterprise Risk Management

Appendix E - Material trading entities within the Tourism Holdings Limited Group

As of 30th June 2024

Waitomo Caves Limited (New Zealand)

Action Manufacturing LP (New Zealand)

TH2Connect LP (New Zealand)

Apollo Motorhome Holidays Limited (New Zealand)

THL Group (Australia) Pty Ltd (Australia)

Tourism Holdings Australia Pty Ltd (Australia)

Outdoria Pty Ltd (Australia)

Apollo Motorhome Holidays Pty Ltd (Australia)

Apollo Motorhome Industries Pty Ltd (Australia)

thl RV Sales Adelaide Pty Ltd (Australia)

Sydney RV Group Pty Ltd (Australia)

Apollo RV West Pty Ltd (Australia)

AMH Products Pty Ltd (Australia)

GRL Enterprises Pty Ltd (Australia)

Apollo Investments Pty Ltd (Australia)

Apollo RV Service & Repair Centre Pty Ltd (Australia)

Tourism Holdings USA Inc (United States)

El Monte Rents Inc (United States)

CanaDream Inc (Canada)

THL UK and Ireland Limited (formerly Skewbald Limited) (United Kingdom)

Bunk Campers Limited (United Kingdom)

thl SpeakUp

See something, say something

At ***thl***, we are committed to fostering a workplace culture where individuals feel safe to raise concerns, with assurance that we will act quickly and effectively to investigate, mitigate, and remedy harm. If you have concerns about modern slavery, broader human rights issues, or the safety of any individual connected with our business or with one of our suppliers, please contact us using the details below. Your confidentiality will be prioritised, and you have the option to remain anonymous if preferred.

Our ***SpeakUp*** platform can be accessed through the following channels:

By phone:

- **In New Zealand**: 0800 2 253780 (0800 2 ALERT)
- **In Australia**: 1800 425378 (1800 4 ALERT)
- **In the United States**: 1-833-731-3452
- **In Germany**: +64 800 773 25287 (0800 SPEAK 2 US)
- **In Canada**: 1-833-613-1020
- **In the UK and Ireland***:
  https://ethicspro.reportitnow-global.com/THL
  or scan the QR Code below.

* The Call Report It Now link above is via the internet, which may incur a mobile data cost to the caller.