

Modern Slavery Statement

Australian Pacific Touring Group and Associated Brands

Reporting Period: 1 January 2025 – 31 December 2025

This Modern Slavery Statement is submitted on behalf of **Australian Pacific Touring Pty Ltd (APT)** and its associated brands, including:

- **Travelmarvel**
- **Botanica World Discoveries**
- **Captain's Choice**
- **APT Luxury Travel**
- **Antarctica Flights**
- **OneTomorrow Charitable Fund**

APT is committed to upholding human rights and addressing risks of modern slavery across its operations and supply chains.

Structure, Operations and Supply Chains

Entity Structure

Australian Pacific Touring Pty Ltd (APT) is a privately owned travel company headquartered in **Moorabbin, Victoria, Australia**. APT operates as the parent entity for a portfolio of travel and tourism brands, including:

- **Travelmarvel** – offering flexible and affordable travel experiences
- **Botanica World Discoveries** – specialising in garden-themed and cultural tours
- **Captain's Choice** – delivering exclusive, luxury journeys by private jet and other premium modes
- **APT Luxury Travel** – providing high-end escorted tours and river cruises
- **Antarctica Flights** – offering scenic day flights over Antarctica
- **OneTomorrow Charitable Fund** – the not-for-profit philanthropic arm supporting community and environmental initiatives

APT is governed by a Board of Directors and managed by an executive leadership team responsible for strategic, operational, and ethical oversight across the group.

Operations

APT designs, markets, and delivers travel experiences across **58 countries** spanning six continents. Its operations include:

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- Tour planning and itinerary development
- Marketing and sales through digital platforms and retail channels
- Customer service and booking management
- On-ground tour delivery via guides, transport, accommodation, and attractions
- Partnerships with local operators and service providers
- Charitable and community engagement through OneTomorrow Charitable Fund

APT's **head office in Moorabbin, Victoria** supports a **hybrid workforce**, with additional offices located in:

- **Broome, Western Australia**
- **London, United Kingdom**
- **Larnaca, Cyprus**
- **Vancouver, Canada**
- **Auckland, New Zealand**

Supply Chains

APT's supply chains are global and diverse, encompassing:

- **Transport providers:** airlines, cruise lines, coach operators, rail services
- **Accommodation partners:** hotels, lodges, river cruise vessels
- **Tour services:** local guides, attractions, cultural performers, excursion operators
- **Food and beverage:** catering services, restaurants, onboard hospitality
- **Advertising and marketing:** media agencies, content creators, promotional services
- **Technology and administration:** software platforms, outsourced support, professional services

APT engages with suppliers across multiple regions and sectors, some of which may involve complex international supply chains and varying levels of labour risk.

Risks of Modern Slavery Practices

APT acknowledges that modern slavery can occur in various forms, including forced labour, debt bondage, human trafficking, and deceptive recruitment practices. Given the nature of the travel and tourism industry, APT's operations and supply chains are exposed to several risk factors:

Operational Risks

- **Third-party service providers:** APT relies on external contractors for transport, accommodation, catering, and tour services. These providers may operate in countries with weak labour protections or limited oversight.

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- **Seasonal and casual labour:** Tourism often involves short-term and subcontracted roles, which can increase vulnerability to exploitation, especially in remote or developing regions.
- **Attractions and excursions:** Some local operators may engage informal labour or lack robust employment standards, particularly in high-tourism areas.

Supply Chain Risks

- **Geographic exposure:** APT operates in 58 countries, including regions identified as high-risk for modern slavery due to poverty, migration, and inadequate regulation.
- **Hospitality and transport sectors:** These industries are globally recognised as vulnerable to forced labour and trafficking, especially where supply chains are fragmented and multi-tiered.
- **Advertising and promotional services:** While lower risk, outsourced creative and digital services may involve offshore teams in jurisdictions with limited labour protections.
- **Technology and administration:** Outsourced IT and support services may be delivered from countries with elevated modern slavery risks.

Charitable Engagement Risks

- **OneTomorrow Charitable Fund** partners with grassroots organisations. While these relationships are built on trust and shared values, APT recognises the need to ensure ethical practices in all funded activities, especially in vulnerable communities.

APT is committed to identifying and addressing these risks through proactive engagement, due diligence, and collaboration with industry peers. The company recognises that modern slavery can be hidden and complex, requiring ongoing vigilance and transparency.

Actions Taken to Assess and Address Risks

APT is committed to preventing modern slavery across its operations and supply chains. In 2025, the company undertook targeted actions to assess and mitigate risks, with a focus on supplier engagement, policy integration, employee education, and community support.

Risk Assessment and Due Diligence

- **Supplier Survey:** APT surveyed suppliers representing **83% of its total supply spend**, achieving a **70% response rate**. The survey included direct questions about potential involvement in modern slavery practices and required suppliers to disclose relevant policies, recruitment methods, and labour conditions.
- **Supplier Code of Conduct:** As part of the survey, suppliers were required to agree to APT's **Supplier Code of Conduct**, which includes explicit commitments to ethical labour practices and compliance with modern slavery legislation.
- **Contractual Integration:** The Supplier Code of Conduct is now **embedded in APT's contracting process**, making adherence to anti-slavery principles a mandatory condition for all new and renewed supplier agreements.

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- **Onboarding Checks:** New suppliers undergo screening for ethical standards, including verification of employment practices and subcontracting arrangements.

Policies and Governance

- **Modern Slavery Policy:** APT has adopted a formal policy outlining its zero-tolerance stance on modern slavery and its expectations of suppliers and partners.
- **Code of Conduct:** All employees and contractors are bound by a Code of Conduct that promotes human rights, fair treatment, and ethical behaviour.
- **Whistleblower Protection:** APT maintains a confidential reporting mechanism for concerns related to unethical or unlawful conduct, including modern slavery.

Training and Awareness

- **Ongoing Employee Training:** All APT employees have access to **ongoing training on modern slavery**, delivered through **online modules** and **live guest speaker sessions** held annually.
- **Supplier Engagement:** APT communicates its ethical standards to suppliers and encourages collaboration on improving labour conditions.
- **Leadership Oversight:** Senior management regularly reviews modern slavery risks and actions as part of broader ESG and compliance reporting.

Remediation and Response

- **Incident Protocols:** APT has established procedures for investigating and responding to suspected cases of modern slavery, including escalation to legal and compliance teams.
- **Corrective Action Plans:** Where risks are identified, APT works with suppliers to implement remediation measures and monitor progress.
- **Termination Rights:** APT reserves the right to terminate relationships with suppliers who fail to meet its ethical standards or refuse to engage in remediation.

Community Engagement

- **Blue Dragon Marathon Participation:** APT staff actively participate in the **Blue Dragon Marathon** each year, raising funds to support the **Blue Dragon Children's Foundation** and its work in **modern slavery prevention in Vietnam**. This initiative reflects APT's broader commitment to human rights and social responsibility.

Assessing Effectiveness

APT recognises that addressing modern slavery requires not only action but also ongoing evaluation to ensure those actions are meaningful and impactful. The company uses a combination of internal metrics, stakeholder engagement, and real-world feedback to assess the effectiveness of its anti-slavery initiatives.

Supplier Engagement Metrics

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- In 2025, APT surveyed suppliers representing **83% of total supply spend**, with a **70% response rate**. These figures are used as benchmarks to measure supplier engagement and transparency year-on-year.
- Survey responses are analysed to identify gaps in supplier awareness, policy adoption, and risk exposure, informing future engagement strategies.

Contractual Compliance

- The **Supplier Code of Conduct**, now embedded in all contracts, is monitored for compliance through onboarding checks and periodic reviews.
- APT tracks the number of suppliers agreeing to the Code and flags any exceptions for further investigation.

Training Participation

- APT monitors employee participation in **online training modules** and **live guest speaker sessions** on modern slavery.
- Completion rates and participant feedback are used to refine training content and delivery methods, ensuring relevance and retention.

Traveller Feedback as a Monitoring Tool

- APT and its brands welcome nearly **50,000 travellers annually**, each of whom interacts directly with APT's services and suppliers across 58 countries.

These travellers serve as **informal on-the-ground observers**, often witnessing service delivery in real time and in diverse cultural and geographic contexts.

- APT actively encourages feedback from travellers, creating a **community-based ethical feedback loop** that helps identify potential concerns related to labour practices, exploitation, or mistreatment.
- Traveller insights provide a valuable layer of visibility into supplier behaviour and help APT detect issues that may not be captured through formal audits or surveys.

Incident Monitoring and Remediation

- APT maintains a **whistleblower mechanism** and internal reporting channels to capture concerns related to unethical conduct.
- Any reported incidents are reviewed by legal and compliance teams, with outcomes documented and used to improve protocols.

Governance and Oversight

- Senior leadership receives regular updates on modern slavery risks and mitigation efforts as part of broader ESG reporting.
- APT is working toward establishing **Key Performance Indicators (KPIs)** to track progress, such as:
 - Percentage of suppliers assessed for modern slavery risk

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- Number of suppliers requiring remediation
- Employee training completion rates
- Traveller-reported concerns related to labour practices

APT is committed to refining its evaluation framework and welcomes feedback from stakeholders to strengthen its approach.

Consultation Process

APT recognises the importance of consultation in preparing a meaningful and accurate Modern Slavery Statement. The company undertook a structured internal and external engagement process to ensure alignment across its brands and entities.

Internal Consultation Across the Group

This statement was prepared in consultation with key stakeholders across APT and its associated brands, including:

- **Travelmarvel**
- **Botanica World Discoveries**
- **Captain's Choice**
- **APT Luxury Travel**
- **Antarctica Flights**
- **OneTomorrow Charitable Fund**

Input was sought from leadership teams, legal and compliance departments, procurement and supplier management teams, and operational staff across APT's offices in **Moorabbin, Broome, London, Larnaca, Vancouver, and Auckland**.

The **OneTomorrow Charitable Fund**, as APT's not-for-profit arm, was specifically consulted to ensure that philanthropic activities and partnerships align with ethical labour practices and modern slavery prevention goals.

External Due Diligence Partners

APT also works closely with a network of external organisations that support due diligence for charitable investments made through OneTomorrow. These partners include:

- **Australian Communities Foundation**
- **Global Development Group (Brisbane)**
- **Myriad Australia**
- **The Gift Trust (New Zealand)**
- **Myriad Canada**

These organisations conduct rigorous due diligence on grantees by:

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- Checking the organisation, its board, and staff against international watchlists
- Reviewing financial information, annual reports, and public reputation
- Assessing project proposals, budgets, and financial management practices
- Confirming compliance with local regulations
- Requiring regular reporting from grantees to ensure funds are used appropriately and ethically

This collaborative approach ensures that OneTomorrow's charitable investments uphold APT's commitment to ethical standards and modern slavery prevention.

Ownership and Control

APT owns and controls the brands listed above, and all entities were actively involved in the preparation of this statement. No external entities outside APT's ownership structure were relied upon for the development of this statement, though external partners were consulted for due diligence insights.

APT remains committed to transparent collaboration across its group and with trusted external partners and will continue to strengthen consultation practices in future reporting cycles.

Other Relevant Information

APT's commitment to preventing modern slavery extends beyond compliance and risk management. The company actively fosters a culture of ethical responsibility, community engagement, and continuous improvement across its operations and partnerships.

Blue Dragon Children's Foundation Partnership

APT maintains a strong and ongoing partnership with the **Blue Dragon Children's Foundation**, a leading organisation in modern slavery prevention in Vietnam. This relationship includes:

- **Weekly updates** on emerging issues and case studies
- **Regular in-house guest speakers and special events**
- Recognition as the **most supported charity** in APT's workplace giving program
- **Annual participation in the Blue Dragon Marathon**, raising funds for anti-trafficking efforts
- In **2025**, APT **sponsored the development of a brand-new Blue Dragon Children's Centre in Ho Chi Minh City**, expanding the foundation's reach and impact in protecting vulnerable children and combating exploitation. The **opening of the centre was attended by APT's Chief Operating Officer**, reflecting the company's deep commitment to frontline engagement and ethical leadership.

Industry Collaboration and Leadership

APT is proud to be one of the **inaugural participants** in the **Australian Tourism Industry Association (ATIA) Modern Slavery Travel Industry Collaboration Group**, founded by **Intrepid Travel** and **Flight Centre Ltd**. This group provides a platform for:

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- Regular discussion forums and creation of a leadership space
- Continuous improvement in Modern Slavery Act reporting and compliance
- Learning, sharing, and problem-solving around emerging risks and trends
- Legal and legislative updates with opportunities for consultation
- Development of industry leadership initiatives and shared resources
- Feedback and review of progress, with a focus on risk-based approaches
- Operationalising human rights and modern slavery strategies across the sector

APT is **represented at every meeting** of this industry group and actively contributes to its mission of advancing ethical standards in tourism.

Future Commitments

APT is committed to enhancing its modern slavery response through:

- Development of measurable KPIs and impact tracking
- Expansion of supplier training and engagement
- Increased transparency in reporting and stakeholder communication
- Continued integration of ethical principles into business strategy and decision-making

APT views its modern slavery obligations not as a compliance exercise, but as a core part of its mission to deliver travel experiences that are responsible, respectful, and human-centred.

This Modern Slavery Statement has been approved by both the APT Leadership team and the Board of APT and is signed by Lorna Heyward, Chief Operating Officer, on behalf of the organisation.

Signed:



Lorna Heyward
Chief Operating Officer

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