



## MODERN SLAVERY STATEMENT

Financial year ending  
**30 June 2021**

This Modern Slavery Statement was approved by the Board of FCTG, on behalf of itself and Australian OpCo on 21 December 2021:

*Graham Turner*  
CEO, Managing Director and Founder

21 December 2021

A handwritten signature in black ink, appearing to be the initials "GT" followed by a stylized flourish.

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## A message from our Chief Executive Officer

I am pleased to present this report, which is Flight Centre Travel Group Limited's (ABN 25 003 377 188) (FCTG) second Modern Slavery Statement for Australia and the fifth Modern Slavery Statement for our Flight Centre UK business. It again underlines our commitment to this very important area and describes the progress we have made during the 12 months to June 2021 to improve how we detect and manage the risk of modern slavery and human trafficking in our business and supply chains.

FCTG recognises that while modern slavery risks may be higher in certain industries and geographic locations, no country or industry is immune to this shocking reality. As a retailer of travel products globally, we source and sell travel products from countries across the world, and acknowledge that these modern slavery risks may exist in our incredibly diverse supply chains.

We believe – very strongly – that all forms of modern slavery, including slavery, servitude, forced and compulsory labour, forced marriage, debt bondage, human trafficking and child labour, are a violation of fundamental human rights and will not be tolerated in our business or within our supply chains.

We are committed to promoting and selling travel that respects human rights, the environment, wildlife and social equality. We are also committed to acting responsibly, doing what we can to ensure our customers travel safely, maintaining a strong and positive company culture and upholding the values that our stakeholders expect of us.

Further, we are committed to responsible and sustainable travel and tourism, including the identification and prevention of all forms of modern slavery in our business and supply chains. We are committed to acting ethically and with integrity in all our business dealings and relationships.

FCTG expects its people to have a shared commitment to maintain the highest standards of personal and professional ethics, to comply with all relevant laws and regulations and to personify and represent FCTG's values in everything we do.

All employees, contractors and representatives of FCTG are required to read and comply with FCTG's global Code of Conduct, which includes information about risks associated with modern slavery and human trafficking.

In the years ahead, we will inevitably make further progress in this very important area and we look forward to updating you on our achievements.



*Graham Turner  
CEO, Managing Director and Founder*

## Our Approach and Key Areas of Improvements in the past 12 months

FCTG and the travel and tourism sector globally continued to be significantly impacted by COVID-19 and the border restrictions that governments applied to slow the virus's spread. These restrictions forced some of our suppliers to hibernate their businesses or to operate at significantly reduced volumes. For the financial year ending 30 June 2021:

- FCTG trading activities globally were approximately 26% of pre covid levels;
- Many of our travel product suppliers did not trade during the reporting period, or if they did trade, did so at significantly reduced volumes;
- There were negligible sales of travel to higher-risk regions, given ongoing border closures;
- There was a significant reduction of sales of higher risk products (e.g., Cruising) and the majority of these are forward bookings; and
- There was a significant reduction in general procurement activity.

Although the reduction in demand for travel has the potential to reduce the risk of modern slavery across our supply chains, FCTG recognizes that the economic and social consequences of COVID-19 on operators and suppliers may also increase these risks. FCTG remains committed to addressing modern slavery risks within its supply chains and to continually mature its modern slavery awareness and anti-slavery program.

The ongoing restrictions have required FCTG to take severe measures to reduce its cost base and these measures continued during FY21, including a significant reduction of staff levels. In consideration of these restrictions on both our own operations and those of our many supply partners, we focused our efforts on improving our governance framework, on increasing the awareness of modern slavery risks across the group through policy distribution and training as well as engaging external partners to develop our risk management activities throughout our supply chains.

Given that FCTG has an incentivized workforce, staff earning opportunities have typically decreased during the pandemic. The company has, however, moved to reward its people for their efforts and commitment during a very challenging period by introducing a new Global Recovery Rights (GRR) program. Under this program, which was announced in June 2021, share rights were made available for free to almost all of FCTG's global workforce.

### Areas of Improvement

Our key areas of improvement during 2021 include:

- ✓ Review and publication of the FCTG Global Modern Slavery Policy internally
- ✓ Development and deployment of Modern Slavery Awareness training to all FCTG staff globally aimed at:
  - Increasing awareness about modern slavery and human trafficking
  - Informing staff of FCTG's commitment to combatting modern slavery
  - Educating staff on how to recognise risks of modern slavery in the travel industry
- ✓ Further development of our supply chain risk management including:
  - Establishing bulk screening of suppliers using adverse media Risk Screening Tool to identify potential areas of risk

- Introduced Modern Slavery Questionnaires for new suppliers (and existing suppliers upon contract renewals) to increase the awareness of modern slavery across our supply chains and to assist in the identification of risk
- Expanding our Risk Assessment to include the 10 countries with the highest average vulnerability scores from the GSI Vulnerability List
- ✓ Partnering with an external supplier, Informed 365, to implement a supply chain management application to further develop our supply chain risk management activity
- ✓ Ongoing stakeholder engagement with advisors and other businesses to consider ways in which travel agencies can better manage the risk of modern slavery.

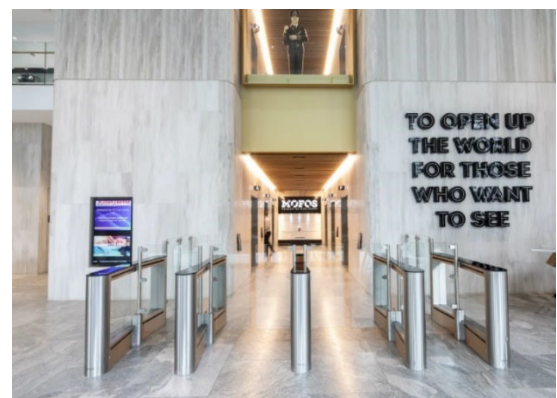
For more information on these areas of improvement, see section 5, Assessing the Effectiveness of our Actions. Also see how we plan to show further improvements in section 7, Next Steps.

## 1. Introduction

This Statement has been prepared by FCTG and describes the actions taken by FCTG, its subsidiaries, joint ventures and the entities owned and controlled by FCTG, including Australian OpCo Pty Ltd (**Australian OpCo**) (ABN 20 003 279 534), collectively referred to as '**the Group**', to address modern slavery and human trafficking risks within our business and our supply chains over the financial year ending 30 June 2021. FCTG and Australian OpCo meet the requirements as reporting entities under the *Modern Slavery Act 2018* (Cth) (the Act).

The Statement has been prepared to meet the requirements of the Australian Modern Slavery Act 2018 and the United Kingdom Modern Slavery Act 2015.

It has been prepared by our Modern Slavery Working Group for FCTG and Australian OpCo, a collaboration of our Enterprise Risk, Financial Crime Compliance and In-House Legal teams, who have consulted with senior executives and subject matter experts from each area of our business (including FCTG and Australian OpCo) and with input from external experts.



## 2. Our Structure, Operations & Supply Chains

### Our structure and operations

FCTG's purpose is to open up the world for those who want to see. Every day, we give people all around the world the opportunity to experience something amazing – travel! Our company is our people and we care for our colleagues' health and wellbeing and are committed to respecting the human rights of our people wherever they work for us.

Starting in the early 1980s as an Australian leisure travel agency, FCTG has grown to be one of the world's largest travel groups and has been listed on the Australian Securities Exchange since 1995 (ASX: FLT).

Today, FCTG has a leisure and/or corporate travel presence in more than 20 countries, plus a small network of in-destination businesses (referred to internally as The Travel Group) specialising in touring, hotel management and destination management.

We have corporate or leisure travel businesses in 23 countries and are headquartered in Brisbane, Australia. As at 30 June 2021 the Group employed approximately 8,000 fulltime equivalent employees worldwide. In Australia, employment conditions are covered by the National Employment Standards (NES), which set out the 10 minimum employment entitlements that must be provided to all employees. In addition, more than 70% of our Australian employees are covered by modern awards or industrial agreements, which set minimum pay and conditions for specific categories of workers. The remainder of our employees have individual employment contracts, which provide additional conditions for an individual employee, but cannot reduce or remove the minimum entitlements prescribed under the NES.

In every country within which FCTG operates, employees are paid at least the appropriate prevailing wage to comply with all legal requirements. No employee is required to work more than the regular and overtime hours allowed by the law of the relevant country.

We undertake annual reviews of the modern awards and employment contracts to ensure our workers' entitlements are being met. We also undertake regular internal and external audits of payroll to ensure our workers are being paid correctly.

Our vast leisure, corporate and wholesale travel service network extends throughout four major regions:

1. Australia and New Zealand;
2. The Americas, specifically the United States, Canada and Mexico;
3. Europe, the Middle East and Africa (EMEA); and
4. Asia (Greater China, India, Singapore and Malaysia).

In addition, our global corporate travel management network, FCM, extends to more than 70 other countries through strategic licensing agreements with independent local operators.



Australia	New Zealand	USA
Canada	Mexico	United Kingdom
South Africa	India	Mainland China
Hong Kong	Singapore	UAE
Malaysia	Ireland	Netherlands
Sweden	France	Germany
Denmark	Norway	Finland
Switzerland	Spain	

FCTG has numerous brands, including the flagship Flight Centre leisure travel brand and the key corporate brands of FCM and Corporate Traveller.

In addition, FCTG also holds investments in joint ventures as follows:

- 46.6% shareholding in Pedal Group Pty Ltd (Pedal Group). Pedal Group is also a reporting entity under the Act and will submit its own modern slavery statement. FCTG has joint control of Pedal Group. Significant shareholdings in Pedal Group include a 100% shareholding in 99 Bikes Pty Ltd and 99 Bikes NZ Limited, a Brisbane and Auckland based national chain of retail bike stores, and a 100% shareholding in Advance Traders (Australia) Pty Ltd and Advance Traders (New Zealand) Limited, Brisbane and Auckland based wholesale bike companies and a 100% shareholding in PGP Co Pty Ltd, a Brisbane based property purchasing company for 99 Bikes leases.

FCTG has contractual arrangements in place to establish joint control over each entity’s economic activities, including financial and operating decisions.

## Our supply chain

FCTG has an extensive and complex range of travel and tourism related product suppliers that may be contracted or non-contracted, depending on the volume and nature of supply. Suppliers of these products and services vary in size and maturity from large global entities to small family operated accommodation or tour providers. Depending on the nature of the product and service, supply agreements may be global, regional or local.

FCTG categorises its suppliers based on the nature of the product or service they provide. Categories include:

- air travel service providers;
- accommodation providers;
- tour operators;
- transport providers;
- holiday package providers; and
- ancillary product and service providers.

FCTG also engages with non-trade suppliers to provide goods and services to support FCTG operations. Examples include information technology, marketing and printing, uniforms, stationery, cleaning contractors and more.

## 3. Risks of Modern Slavery Practices in our Operations and Supply Chains

### Transparency in our operations and supply chains

Transparency is fundamental to maintaining a safe and responsible supply chain. Our Modern Slavery Working Group has assessed areas of our operations and supply chains where modern slavery risks are likely to be most prevalent, utilising research and data sources from the UN Guiding Principles, 2018 Global Slavery Index and the Australian Institute of Criminology.

Using a combination of geographic and product categorisation as risk identifiers to assess supplier risk, we have mapped our supply chains and performed a risk assessment including conducting enhanced checks where necessary. Enhanced checks involved:

- screening suppliers and their shareholders/directors for adverse media relating to human exploitation;
- sending out questionnaires to suppliers; and
- ongoing monitoring of high-risk supplier operations.

### Geographic assessment – modern slavery risk

With reference to the UN Guiding Principles and the 2018 Global Slavery Index, FCTG assessed potentially high-risk regions for modern slavery to include the Middle East, Africa and South East Asia. Cambodia, Thailand and Vietnam have also been assessed as potentially high-risk countries within FCTG's operations and supply chains, because of the modern slavery risks associated with Orphanage Tourism and Voluntourism.



Sectors which engage high numbers of low-paid, seasonal or agency workers through third party labour providers may also present a greater risk of exploitative practices.

### Product assessment – modern slavery risk

The Modern Slavery Working Group also considered modern slavery risks in our operations and supply chains in relation to the sectors from which we procure goods and services. During the reporting period, we identified the following potential high modern slavery risk areas:

Supply Chains	Possible Modern Slavery Practices
<b>Air products (Airlines, Charter flights, etc.)</b>	Underpayment, excessive working hours
<b>Accommodation and Hospitality (Resorts, Hotels, etc.)</b> (specifically cleaners, kitchen and maintenance staff)	Underpayment, excessive working hours, child labour
<b>Cruise ships</b>	Underpayment, excessive working hours, passports and/or wages withheld
<b>Tour operators</b>	Underpayment, excessive working hours
<b>Orphanage tourism</b>	‘Bad’ Orphanages exploiting children for profit
<b>Voluntourism</b>	Child trafficking and exploitation
<b>Transport providers (including drivers)</b>	Underpayment, excessive working hours
<b>Uniform providers</b>	Underpayment, excessive working hours, child labour
<b>Technology providers</b>	Underpayment, excessive working hours

## 4. Actions Taken to Assess and Address Modern Slavery Risks

### Supplier and client commitments

To further assess modern slavery risks within the Group’s operations and supply chains, during the reporting period we enhanced our supplier on-boarding process. Our Modern Slavery Working Group developed and deployed a supplier questionnaire which among other things sought to identify:

- whether the supplier was aware of any form of modern slavery in their organisation;
- if they have been accused of or investigated for any form of modern slavery related activity;
- whether the supplier has due diligence procedures to ensure modern slavery does not exist in their organisation or supply chains; and
- the level of awareness and understanding of modern slavery risks in their business and supply chains.

Additionally, FCTG also screened suppliers for adverse media relating to human exploitation.

Our contracts with suppliers and clients also include anti-slavery and anti-human trafficking provisions to reflect our zero-tolerance for inaction in relation to modern slavery. FCTG is committed to not knowingly conducting business with anyone engaged in modern slavery or human trafficking or knowingly permitting such conduct to be carried out within our supply chains.

### Governance and Policies

FCTG has a robust governance framework, with the FCTG Board responsible for the approval and oversight of our sustainability strategy, which includes our human rights commitment and modern

slavery Statement. The CEO and Global Executive Group (Taskforce) is responsible for risk management across the group. Our Modern Slavery Working group, in conjunction with our People and Culture team, is responsible for developing and implementing the Group's modern slavery risk management program.

Key internal stakeholders include:

- FCTG Board
- FCTG Audit and Risk Committee
- FCTG Taskforce
- People and Culture
- Modern Slavery Working Group
- Our people

FCTG has a suite of policies that seek to mitigate the risk of modern slavery and human rights violations across our operations and supply chains.

- Modern Slavery policy
- Anti-Bribery and Corruption Policy
- Code of Conduct
- Risk Management Policy
- Whistleblowing Policy
- Diversity Policy
- Workplace Gender Equality Agency Report 20-21
- Privacy Policy

FCTG's Code of Conduct and Modern Slavery Policy outline the minimum standards of behavior expected of FCTG employees and representatives in general and specifically regarding the risk of modern slavery. These policies set out our commitment to acting ethically and responsibly, going beyond mere compliance with legal and regulatory obligations. Rather, it involves acting with honesty, integrity and in a manner that is consistent with the expectations of FCTG stakeholders and the broader community. The Modern Slavery Policy confirms FCTG's commitment to the identification and prevention of all forms of modern slavery in our business and supply chains. Under these policies, employees, contractors and representatives are encouraged to raise any concerns they might have in relation to the treatment and working conditions of any person in our business or supply chains.

FCTG takes compliance with and enforcement of its legal, ethical and social responsibilities seriously. This includes mitigating the risk of modern slavery occurring in our operations and supply chains. Any material breach of our policies is reported to the FCTG Board or an FCTG Board committee and may be considered misconduct and result in disciplinary action (including cessation of employment or engagement).

### **Remediation and Grievances**

FCTG also has a Whistleblower Policy and operates a confidential, external whistle-blower service that can be used by employees, directors, contractors and other representatives as a tool to report issues or concerns about modern slavery anonymously. Any reports made under the Whistleblower Policy are investigated and treated sensitively and seriously. A confidential summary of the number and type of whistleblower matters raised is presented and discussed at each Audit and Risk Committee

meeting, with additional information provided about any material incidents.

FCTG's response to a report will vary depending on the nature of the report and the amount of information provided. This may include engagement with suppliers, customers and other stakeholders. In these cases, steps are taken to understand the issue(s) and to take appropriate action. This may involve referring the matter to the appropriate authorities (in the case of suspicions or allegations of modern slavery) or engaging with the entity about the areas of concern. It also includes the need to consider remediation processes and remedy if modern slavery is occurring.

## Training

Improving staff and management awareness of modern slavery risks is vital to our sustainable and ethical approach to reduce the risk of slavery or human trafficking not being identified and addressed within our business or across our supply chains.

During the reporting period, FCTG developed modern slavery training for all employees across our group targeted at increasing the awareness of modern slavery risks both in our operations and supply chains and providing our people with a clear path for raising any concerns they may have or become aware of. This training was made available to all staff via our online training application and was delivered face to face in certain regions.

## Corporate social responsibility

FCTG set up formal structures and procedures to underpin its corporate social responsibility platform. We proudly support and advocate responsible travel, positive diversity practices, empowered giving, and conservation of natural resources and sustainability.

To read more about what we are doing on our sustainability journey, please see our [Sustainability Report](#).

FCTG is also a contributing member of the United Nations Global Compact (UNGC). The UNGC initiative was created to encourage businesses worldwide to adopt sustainable and socially responsible policies and practices. To learn more about our progress on the delivery of our commitments to the UNGC, please see our [Communication On Progress](#) report.

FCTG has also harnessed all its global corporate social responsibility activities into one program, 'FCTG Brighter Futures -

Homepage > About Us > Corporate Social Responsibility

## Corporate Social Responsibility

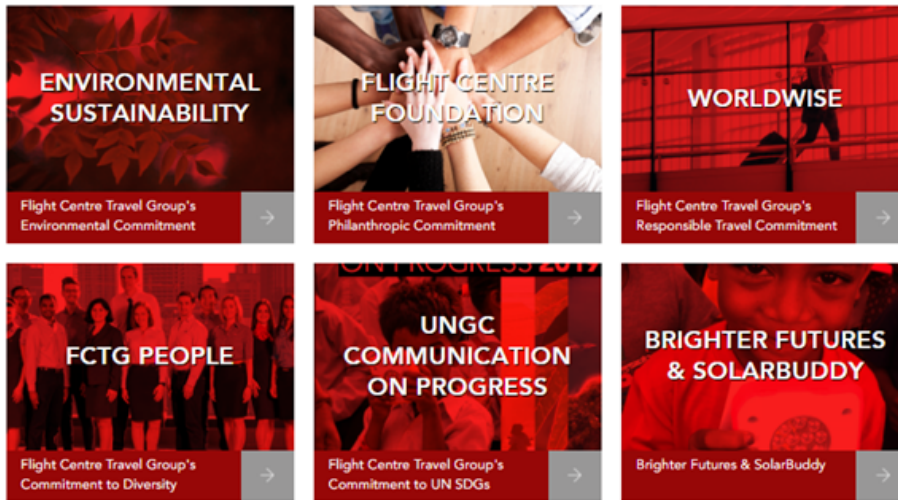
### FCTG's Corporate Social Responsibility program, Brighter Futures

FCTG through its Brighter Futures program, implements its corporate social responsibility commitments through the four pillars of:

- **Worldwise** – delivering responsible travel;
- **FCTG People** – delivering positive diversity practices and egalitarianism;
- **Flight Centre Foundation** – delivering empowered giving; and
- **Environmental Sustainability** – delivering best practice in environmental protection.

We are also a contributing member of the United Nations Global Compact. The UNGC initiative was created to encourage businesses worldwide to adopt sustainable and socially responsible policies and practices. To see how we are progressing along our socially responsible journey refer to our most recent Communication on Progress 2019.

You can find all the latest news on what we are doing on our sustainability journey – [Latest Corporate Social Responsibility News](#).



Visit

<https://www.fctgl.com/about-us/corporate-social-responsibility/responsible-travel/truth-about-orphanages/> to see read our report on Truth about Orphanage Tourism.

## 5. Assessing the Effectiveness of our Actions/KPI's

The below table describes how we assess the effectiveness of the Key Performance Indicators (KPI's) used to address the risks of modern slavery practices in our operations and supply chains:

Action (KPI)	How effectiveness is assessed	FY2021 Outcomes
<b>Board oversight of actions taken</b>	Regular discussion and review at FCTG Board and/or the Audit and Risk Committee meeting	Material matters discussed at Audit and Risk Committee meetings during the year
<b>Informed/knowledgeable stakeholders/country leaders</b>	Number of stakeholders/country leaders informed in modern slavery updates	Targeted training for senior executives, procurement, mergers and acquisition teams and employees located in high-risk regions
<b>Staff Training (Modern Slavery Awareness Training)</b>	Monitoring the training percentage output from FCTG's learning management system (LMS)	58% of FCTG AU employees (and 38% of FCTG employees globally) have completed the e-learning module
<b>Contracts with modern slavery requirements</b>	The number of supplier contracts with modern slavery conditions	Standard contracts reviewed by inhouse legal counsel
<b>Supplier Monitoring (Modern Slavery Questionnaires)</b>	Number of MS Supplier Questionnaires completed	Measurement deferred until FY22 as a large number of suppliers did not trade during FY21 or traded at significantly reduced volumes.
<b>Supplier Monitoring (Screening)</b>	Number of Suppliers screened using World Check's Special Interest Categories (Exploitation of Children, Human Trafficking, Forced and Slave Labour, Sexual Exploitation, Wildlife Crime & Environmental Crime)	~50,000
<b>Global platform to support our supply chain due diligence process</b>	Level of coverage across supply chain	Contracted with Informed 365
<b>Grievances &amp; Whistleblowing</b>	Number of grievances or whistleblowing raised with modern slavery concerns	0
<b>Raise awareness of the Act</b>	Informed/knowledgeable stakeholders	Partnered with Informed 365 with a view to create a Travel Consortium to enhance the management of risks across the sector

We will continue to streamline processes within our supply chains management to effectively assess modern slavery risks.

As described above, FCTG established a cross-business Modern Slavery Working Group to monitor its response to modern slavery risks, however the Modern Slavery Working Group met less frequently than planned due to the impacts of COVID-19.

## 6. Consultation with owned or controlled entities

FCTG operates its business activities through a range of wholly owned subsidiaries, controlled entities and associates. FCTG has implemented a group-wide modern slavery risk management framework that is implemented locally by each business unit. The Modern Slavery Working Group has consulted with those responsible for the implementation of our human rights and modern slavery program, including regional People and Culture leaders and the Taskforce, regarding the operation of the Modern Slavery framework as well as in the development of this Statement.

Consideration has been given to the reporting requirements of the Australian and UK Modern Slavery Act and the actions we need to take to address the requirements and to continuously improve. FCTG will continue to monitor for any updates to governments enacting regulations for modern slavery reporting in other jurisdictions in which we operate, such as USA, Canada, Europe, France, Netherlands and Hong Kong.



## 7. Additional Information/Next Steps

FCTG is committed to identifying and remediating modern slavery risks in its supply chains and operations.

We will continue to review, develop and promote our policies and practices to identify and mitigate risk areas for modern slavery and human rights abuse in our business and supply chains as part of our ongoing commitment to continuous improvement. We will achieve this by:

- The establishment of a Sustainability task force;
- The appointment of a Global Sustainability Officer. Since year-end, this has taken place;
- Expanding engagement across businesses through Employee Resource Groups and cross functional working groups;
- Ongoing review and development of our risk management framework;
- Ongoing development of our supply chain map and risk management activities;
- Expanding the scope of high-risk countries reviews (for monitoring and screening purposes);
- Liaising with industry bodies and government (e.g., GOV.UK Modern Slavery Assessment Tool); and
- Internal Audit of Modern Slavery Program.

We recognise we have continuous work to do to identify and manage the risk of modern slavery in our organisation and supply chains.

As one of the world's largest travel groups, we are confident FCTG has the capacity and leverage to drive change throughout our supply chains and we will continue to engage with our stakeholders and look to identify further areas of improvement.

For more information about Flight Centre Travel Group, visit <https://www.fctgl.com/about-us/>.