



FY23

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 ANNEXURE A (THL).

Contents

Foreword	5
<hr/>	
1. About this statement	6
Consultation to prepare this Modern Slavery Statement	6
Disclaimers	6
1.1 Our commitment to becoming future-fit	7
FY23 highlights	7
<hr/>	
2. Our Operations, Structure and Supply Chain	8
2.1 Our operations	8
2.2 Our brands	9
2.3 Our employees	9
2.4 Our organisational structure and governance	9
2.5 Our supply chain	9
2.5.1 FY23 supply chain analysis	10
<hr/>	
3. Identifying Modern Slavery Risks	12
3.1 Defining modern slavery	12
3.2 Industry risk factors	12
3.3 Risk Methodology	13
3.4 Prioritised risk areas	14
3.4.1 Operational risks	14
3.4.2 Supply chain risk	15
<hr/>	
4. Addressing and Mitigating Risks	17
4.1 Organisational approach	17
4.2 Strategy	18
4.2.1 Our approach: a future-fit mindset and methodology	18
4.3 Governance	19
4.3.1 Our approach: mitigating risk through clear accountability and commitment	19
4.4 Internal Capability	20
4.4.1 Our approach: investing in our crew to build capability	20
4.5 Sustainable procurement	21
4.5.1 Our approach: building maturity in sustainable procurement	21
4.6 External collaboration	22
4.6.1 Our approach: proactive collaboration	22
4.7 Grievance and remediation	23
4.7.1 Our approach: accessible reporting and active response	23
<hr/>	
5. Measuring effectiveness	24
5.1 Actions for FY24	24
<hr/>	
6. Conclusion	26
<hr/>	
Annexure A – material trading entities within the Tourism Holdings Limited Group	27



**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.



thl has a global commitment to build our cultural capability, specifically: the skills, knowledge, behaviours and protocols required to plan, support, improve and deliver products and services in a culturally respectful, genuine and appropriate manner.

As a global citizen based in Aotearoa New Zealand, we act in a manner reflecting our 'Kiwi' heritage. We also operate in Australia, the United States, Canada, the United Kingdom and Europe. We acknowledge there are many different cultures and approaches in each country we operate. We therefore take a place-based approach to building our cultural capability, actively recognising and respecting Māori, Aboriginal, Torres Strait Islander and First Nations Peoples of the lands upon which we live and work.

We acknowledge their rich cultures and their continuing connection to land, waters, and communities.

We pay our respects to their Elders past and present.

Foreword

CEO Statement



I am pleased to introduce **thl's** first global Modern Slavery Statement which represents a significant step towards our commitment to human rights and combatting modern slavery in all its forms. With more people living in modern slavery than at any point in history, we are aware that businesses have a pivotal role to play to build momentum in the fight against exploitation and are committed to taking action to lead our industry in this space.

This Statement outlines our approach to identify, mitigate, and address our modern slavery risks and reflects our dedication to creating a business that protects and supports the rights of all individuals impacted by our business practices in all our countries of operation.

By applying a future-fit mindset and methodology based on the 23 goals of the Future-Fit Business Benchmark, we have made strides in advancing our goals related to human rights. We have embedded actions within our broader future-fit sustainability strategy that underpins our commercial and operational decisions, and in our sustainable procurement five-year plan, known as our Flexible Framework. The development of a Sustainable Procurement Policy and a comprehensive Supplier Code of Conduct reflects key steps we have taken to align our expectations with our crew (employees) and supplier base.

In FY23 we commissioned an external analysis of our spend and supplier profile and Aotearoa New Zealand, and a separate gap analysis of our policies, processes, and practices, to identify opportunities to strengthen our organisational approach to combatting modern slavery and analysing our supply chain data. This resulted in the development of an anti-modern slavery implementation roadmap we call our Thrive Roadmap which will drive organisational change in the coming years. This Statement transparently describes our areas of key risk, the challenges we've faced in addressing them and the initiatives we've put in place so that the protection of people is at the centre of everything we do. While we have made notable progress, we acknowledge that there is a considerable amount of work ahead of us and are dedicated to listening closely to a diverse range of stakeholders to review, amend and improve our approach.

We welcome any feedback and are committed to continuously improving in our journey.

Sincerely,

A handwritten signature in black ink, appearing to read 'Grant Webster'. The signature is fluid and cursive, written over a white background.

Grant Webster
CEO

¹Walk Free Foundation: Global Slavery Index 2023 : www.walkfree.org/projects/the-global-slavery-index/

1

About this Statement

This is **thl**'s first Modern Slavery Statement, covering the reporting period of 01 July 2022–30 June 2023, to meet regional reporting requirements in Australia, the United Kingdom, the United States and Canada and proposed future requirements for Aotearoa New Zealand.

thl is the largest commercial RV rental operator in the world, a multinational, vertically integrated RV manufacturing, rental, and retail business for motorhomes, campervans and caravans. Our Build/Buy - Rent - Sell model is amplified by our Discover Waitomo and Kiwi Experience tourism offerings in Aotearoa New Zealand. Our global footprint reflects the strong expansion of the business and positions **thl** positively for the future.

Tourism Holdings Limited (**thl**) (NZBN: 9429045975592 and ABN: 38 898 280 994) is a prominent New Zealand tourism company. First established as The Helicopter Line, **thl** was listed on the NZX in 1986 and is now also listed on the ASX, trading under the ticker code THL.

We deliver to hundreds of thousands of customers every year across our operations in New Zealand, Australia, United Kingdom and Europe, USA, and Canada; and franchises in Southern Africa and Japan. Collectively we represent over 30 brands, each with strong brand equity and local heritage in the markets they operate. For a comprehensive list of our automotive, manufacturing and tourism brands, please see the **thl – at a glance** section of our [FY23 Integrated Annual Report](#).

Consultation to prepare this Modern Slavery Statement

We placed great importance on consultation throughout the process of designing our modern slavery approaches and preparing our disclosure statement. Our group-wide approach involved regular consultation with stakeholders across our business units, with our Executive Team holding the responsibility to manage human rights risks within their respective business area. The outcomes of these consultations have been reported in our Statement.

To facilitate effective collaboration and consultation, we engaged our Global Sustainable Procurement Working Group which consists of members from across **thl**'s global operations, and with groups/teams progressing work at a country/business unit level. The Group meets monthly and will drive implementation of our activities to mitigate modern slavery. Any findings will be reported to the Executive-level Governance & Ethics Committee (GEC) who have governance over **thl**'s approach to combat modern slavery and associated risks. Risks will be managed at an Executive level through the Risk & Improvement Committee (RIC).

Prior to submission and approval by the **thl** Board, the RIC and GEC endorse the final Modern Slavery Statement.

We welcome any suggestions or comments you may have regarding this statement. Please don't hesitate to reach out to our Chief Responsibility Officer, Juhi Shareef at Juhi.Shareef@thlonline.com. Your feedback will contribute to our ongoing commitment to improving our practices and helping us achieve the highest standards of transparency and accountability.

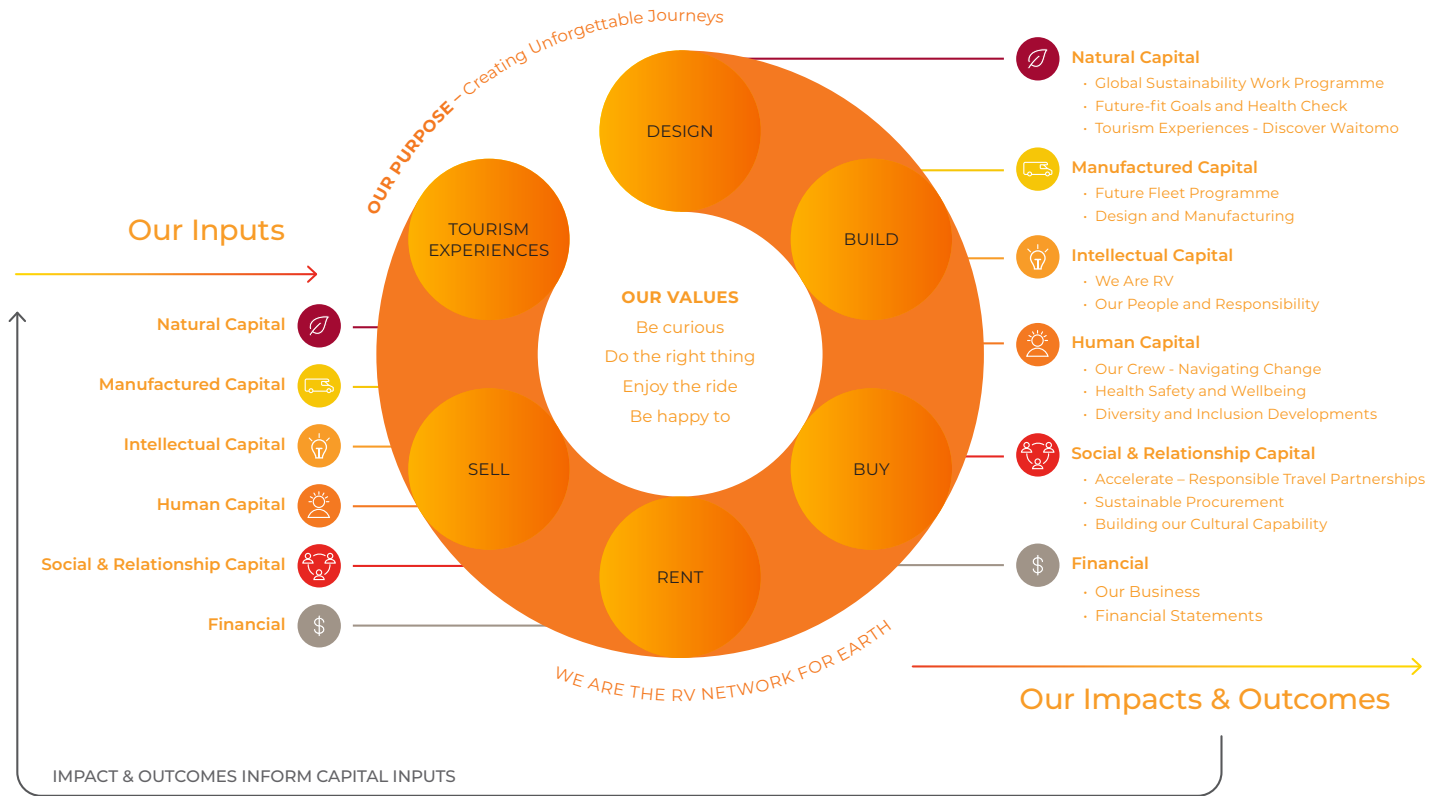
Disclaimers

- **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.

1.1 | Our commitment to becoming future-fit

At **thl**, our commitment to becoming a future-fit business informs our approach to human rights and modern slavery. This means we take proactive measures to identify and address human rights risks, including those related to modern slavery within our operations and supply chains and where appropriate, engage in remediation processes.

Our values to be curious; do the right thing; enjoy the ride; and be happy to drive us to uphold high ethical standards and promote a culture of awareness, responsibility, and action. These principles mean our commitment to combat modern slavery is not only a moral imperative but also a crucial aspect of our business operations.



As part of our Global Future-Fit Sustainability Programme, we have identified the highest impact areas for **thl** and have made significant progress in achieving our goals related to human rights.

These include the following 'Break-Even' (BE) goals from the Future-Fit Business Benchmark:

- > BE04 Procurement safeguards the pursuit of future-fitness (a priority goal for **thl**)
- > BE20 Business is conducted ethically
- > BE10 Employee health is safeguarded
- > BE11 Employees are paid at least a living wage
- > BE12 Employees are subject to fair employment terms
- > BE13 Employees are not subject to discrimination
- > BE14 Employee concerns are actively solicited, impartially judged and transparently addressed

FY23 highlights

Key achievements in FY23 include:

- ✓ Ongoing implementation of our Global Sustainable Procurement 'Flexible Framework'
- ✓ Development of a Sustainable Procurement Policy and Supplier Code of Conduct
- ✓ An initial study of our New Zealand spend and supplier profile
- ✓ Comprehensive gap analysis of our policies, practices and process to define opportunities to strengthen our anti-modern slavery approach
- ✓ Launch of our confidential SpeakUp Policy and platform
- ✓ Development of our 'Thrive' (anti-modern slavery) Implementation Roadmap to drive organisational change within the next year

These achievements reflect our commitment to promoting and safeguarding human rights throughout our procurement processes.

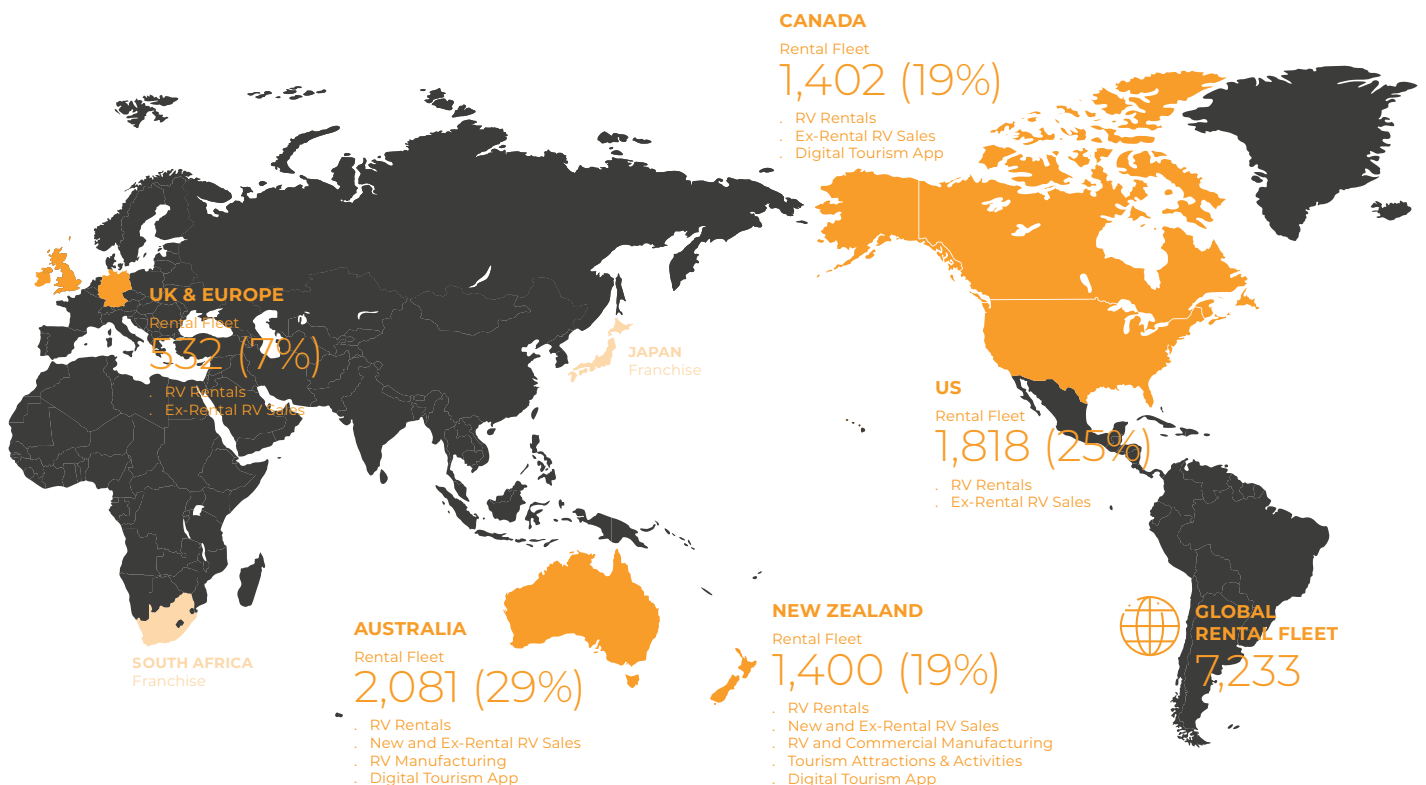
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Our Operations, Structure & Supply Chain

2.1 | Our operations

As a responsible tourism business, with over 35 years of experience, we take a holistic, future focused, system and science-based approach to how we create and maintain value for all our stakeholders. Our family of brands is the world's largest provider of RV experiences, supplying motorhomes, campervans and four-wheel drives to our customers.

We are a global business with locations extending across Aotearoa New Zealand, Australia, the United States, Canada, the United Kingdom and parts of Europe, with our global headquarters located in Auckland, New Zealand. For information on our employee numbers, fleet size, customer experiences delivered and vehicle sales in each country of operation please see the **thl** at a Glance section of our [FY23 Integrated Annual Report](#).



Our key business activities for our 'build/buy-rent-sell' model include building our vehicle fleet, renting and selling recreational vehicles and equipment, and travel services supporting our vision of 'unforgettable journeys'. We are also the proud operators of Kiwi Experience bus tours and the Discover Waitomo business – home to

some of New Zealand's best-known tourism attractions including the Waitomo Glowworm caves and Black Water Rafting.

For more information, please see our [FY23 Integrated Annual Report](#).

2.2 | Our brands

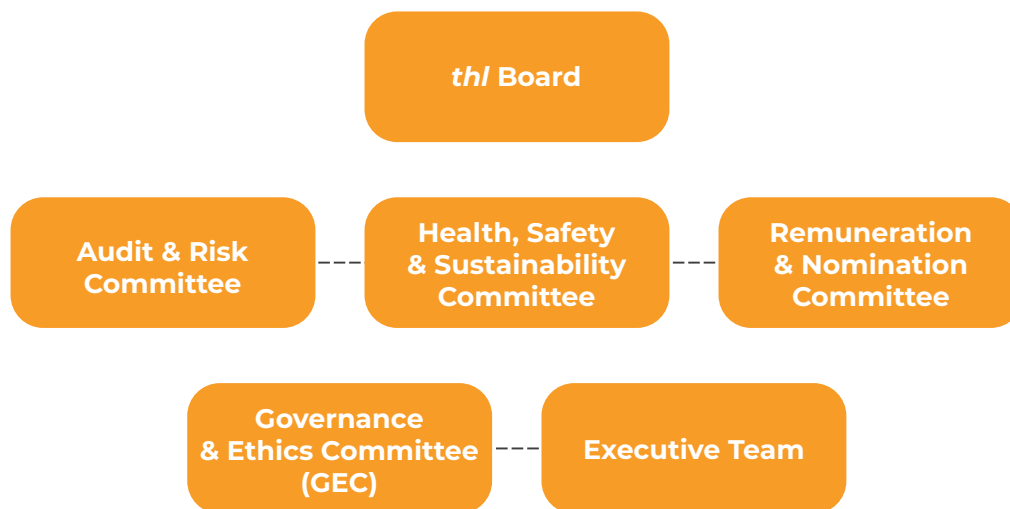
thl owns and operates a diverse portfolio of brands that span various sectors including travel services, recreational vehicle (RV) rental, manufacturing and production and digital solutions. For information on **thl** fully-owned brands and joint ventures, please see please see the **thl** – at a glance and finance sections of our [FY23 Integrated Annual Report](#).

2.3 | Our employees

thl has a global 'crew' of over ~2,377 permanent staff members and casual employees who enable our purpose and live our values every day. In Australia for example, we employed 591 permanent, 78 casual and 14 fixed-term seasonal crew on average in FY23; in New Zealand we employed 864 permanent and 26 casual crew. Our organisation also relies on sub-contracted labour to provide services to support our operations, including drivers and workers within our factories and drivers who facilitate the return of vehicles across regions.

2.4 | Our organisational structure and governance

Our response and management of modern slavery risks are overseen at the Board level and are firmly rooted in our Code of Ethics, found in the Corporate Governance section of our website: www.thlonline.com. Our modern slavery approach is an integral part of **thl**'s global sustainability strategy and is fully endorsed by the Executive Team, Governance & Ethics Committee, and Board.



See p122-124 of our [FY23 Integrated Annual Report](#) for full list of names.

2.5 | Our supply chain

At **thl**, our supply chains are complex and global, encompassing component parts for the manufacture of vehicles as well as tourism services and products for sale within our vehicle and tourism retail outlets. We also depend on suppliers for diverse support services, including cleaning, premises security and maintenance. In FY23, we had a total global procurement spend of approximately \$700 million and in ANZ our total spend was approximately \$400 million. Approximately 80% of **thl**'s global and ANZ procurement spend was on recreational vehicles (RVs) for its rental and retail businesses.

Our merger with Apollo Tourism & Leisure in November 2022 means that FY23 has been a transition year and we are going through a significant integration programme, which includes rationalising our supply chain. We are committed to disclosing accurate data and will therefore provide information about our global tier one suppliers in our next Modern Slavery Statement. This will include the number, categorisation and location of suppliers. Within our three-year 'Thrive' roadmap of actions we aim to map tier two suppliers in our prioritised categories by end of 2025.

2.5.1 | FY23 supply chain analysis

In FY23 we did undertake an external assessment of our top 50 suppliers by pre-merger spend on tier one 'direct' and where possible, tier two 'indirect' suppliers in New Zealand and share this information below.

Methodology

Risks were assessed using the following methodology:



thl spend data was categorised into 13 segments, 24 families, 30 classes and 33 commodities according to the United Nations Standard Products and Services Code® (UNSPSC®) - a global classification system of products and services. The key findings of the supply chain analysis were that the majority of the direct suppliers posed a low modern slavery risk because they are based in low-risk countries. However, when the risk beyond direct suppliers (indirect suppliers) was considered, the risk of modern slavery increased.

Assessing direct suppliers

For direct, tier one suppliers, risks were assessed as high / medium / low depending on the level of risks 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).

Country Indicators

- Internal Conflict
- Internally displaced persons
- Disenfranchised groups
- Lack of social safety net
- Lack of robust judicial system
- Lack of basic needs
- State enforced labour
- Women's physical security
- Political instability

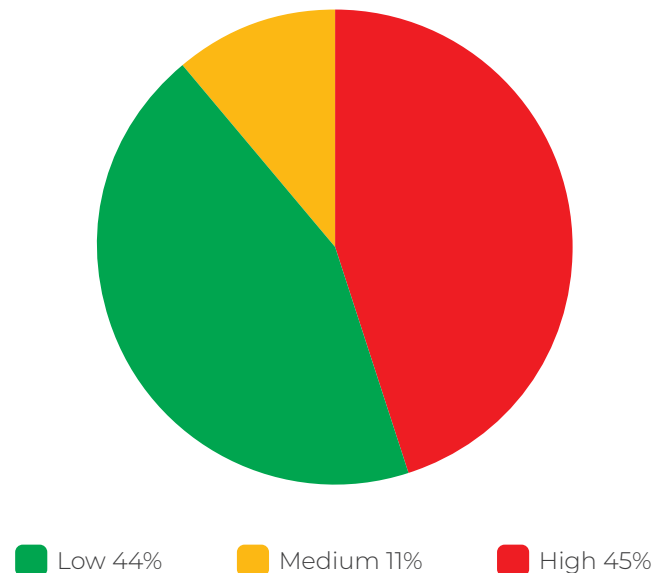
Category/Commodity Indicators

- Use of deceptive recruitment practices
- Use of child labour
- Unregulated workforces
- Lack of employee rights and representation
- Abusive working and living conditions
- Withholding of wages
- Debt bondage
- Excessive overtime
- Retention of identity documents
- Non-living wage

Assessing indirect suppliers

To evaluate risk beyond tier one i.e. for our indirect suppliers, only the Category Risk was assessed since there was not clear visibility of the supplier country. Even though the risk with direct suppliers is low, when looking beyond direct suppliers, 45% of **thl** suppliers can be considered high risk since the categories of manufacturing services, transportation, trade, hospitality, construction and agriculture are graded in the high-risk spectrum, according to ILO 2022.

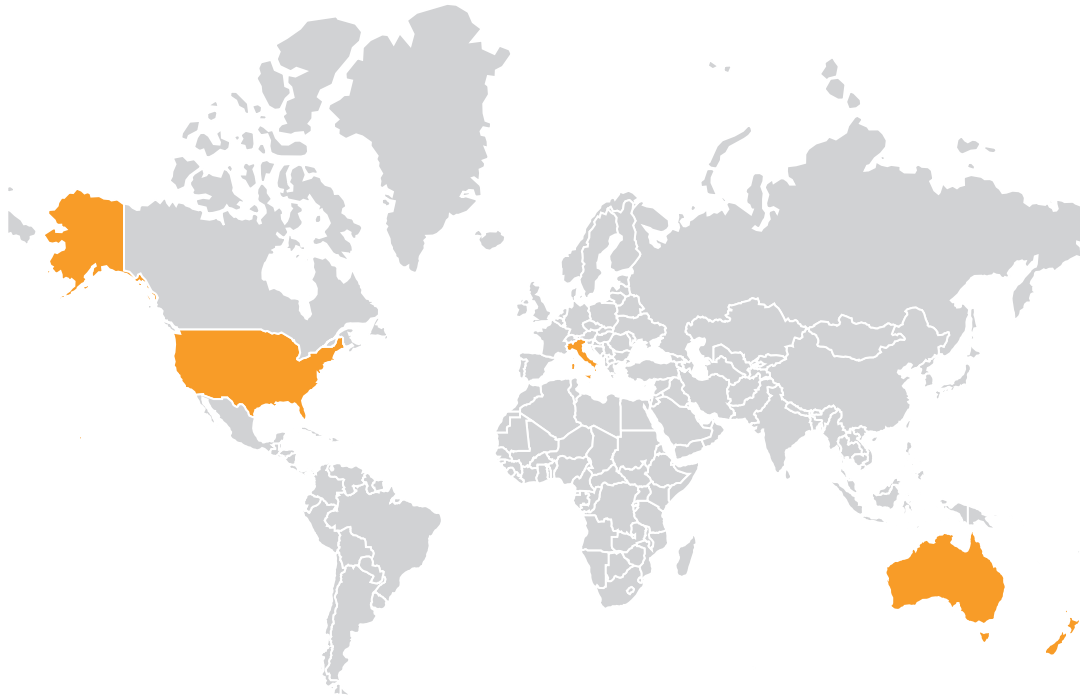
Below: thl New Zealand indirect supplier risk, assessed by category



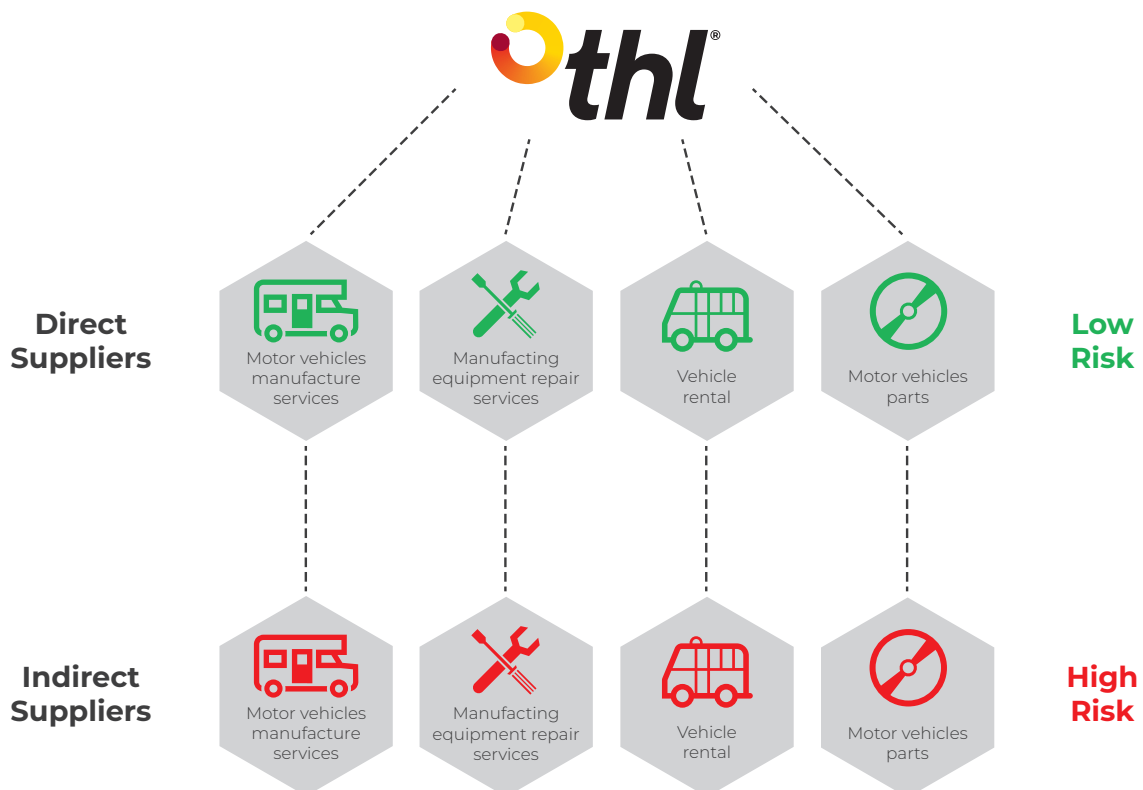
Key findings (based on pre-merger, FY23 assessment of top 50 New Zealand suppliers)

- 92.3% of **thl** New Zealand's FY23 spend was based on New Zealand suppliers, 4.4% on Italian suppliers, 2.7% on Australian suppliers and 0.7% on North American suppliers (see below map).
- **thl** New Zealand's direct suppliers carry a low risk of modern slavery, since 100% of direct suppliers are based in low-risk countries. It must be noted that while suppliers may be based in low-risk countries, manufacturing activities further down the supply chain may take place in countries carrying a higher risk. Further information is required.

Below: Map of thl New Zealand direct suppliers (pre-merger)



- 45% of **thl** New Zealand indirect suppliers can be considered high risk.
- 11% of **thl** New Zealand indirect suppliers can be considered medium risk.



3

Identifying Modern Slavery Risks

3.1 | Defining modern slavery

With recent research estimating that 50 million people are currently trapped in modern slavery conditions, we recognise that no country or industry is disconnected from modern slavery risks. As an organisation operating in multiple regions with a diverse and far-reaching supply chain, we understand the critical importance of identifying our connection to modern slavery both within our operations as well as the tiers within our supply chains.

Core to all forms of modern slavery, is the deprivation of a person's freedom through coercion or threat to exploit them for personal or commercial gain. However, we recognise that the term encompasses many forms of serious exploitation including forced labour, trafficking, debt bondage and servitude.

3.2 | Industry risk factors

Post-merger, to help identify areas where there is a higher potential of modern slavery occurring, we've focussed on the following risks factors inherent to our industry, focussing on automotive rather than tourism risks as our assessment indicates there are greater

risks of modern slavery within the automotive industry. Where multiple modern slavery risk factors co-exist, there is increased likelihood of actual harm being experienced by individuals within our operations and supply chain.

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 increase 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 labour hire 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

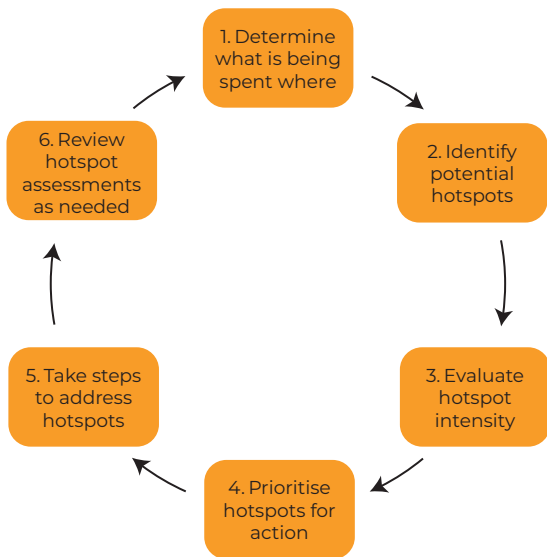
²Walk Free Foundation: Global Slavery Index 2023 : www.walkfree.org/projects/the-global-slavery-index/

3.3 | Risk Methodology

To ascertain operational risk post-merger, we conducted a series of cross-functional interviews in May 2023 (facilitated by an external party) to gain deeper insights into risks associated with the individuals and organisations we work with directly or indirectly. These stakeholder sessions also gathered cross-functional perspectives on business models that may lead to less oversight and stability for the workforce involved. Below is a summary of our methodology to-date.

One of our priority future-fit goals is 'Break-Even (BE) Goal BE04: Procurement safeguards the pursuit of future-fitness. The BE04 action plan requires that 'hotspot assessments' are conducted of procurement activities / suppliers, intended to identify any activity that could undermine progress toward the 'eight properties of a Future-Fit Society', namely:

- Energy is renewable and available to all;
- Water is responsibly sourced and available to all;
- Natural resources are managed to safeguard communities, animals and ecosystems;
- The environment is free from pollution;
- Waste does not exist;
- Our physical presence protects the health of ecosystems and communities;
- People have the capacity and opportunity to lead fulfilling lives; and
- Social norms, global governance and economic growth drive the pursuit of future-fitness.



Aligned with the BE04 action plan, we identified risks associated with our vehicle supply chain. We took a risk-based approach, concentrating efforts on risks where our influence to create positive change is perceived to be most significant. We note that this approach will be dynamic and repeated as our understanding of our supply chain deepens.

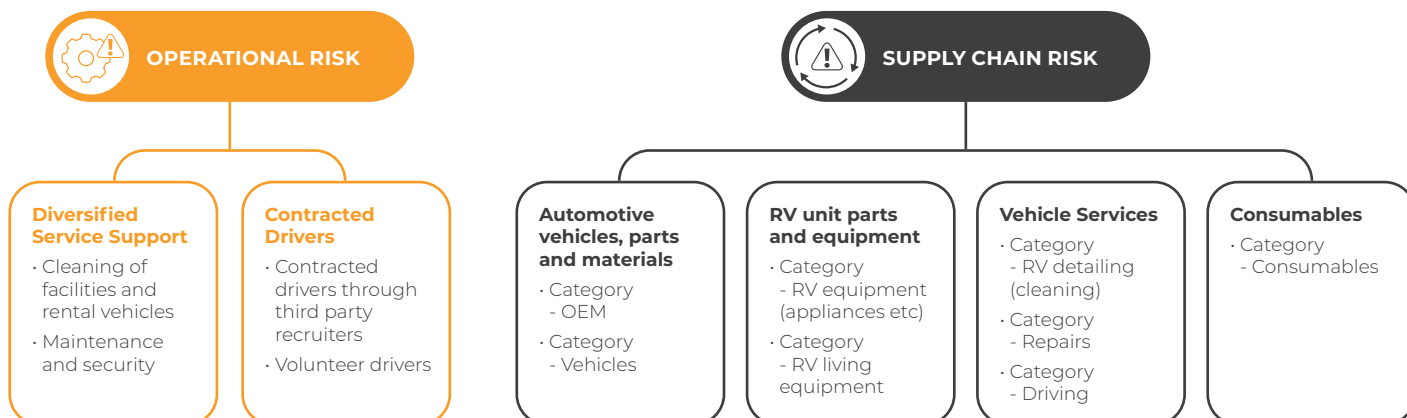
1. Using future-fit hotspot assessments, we mapped our vehicle supply chain by spend, inherent risks, and visibility, providing us with an understanding of key categories with heightened risks and increased leverage.
2. We then reviewed each category to identify hotspots within our supply chain with a perceived high severity of impact and likelihood of occurrence. This hotspot analysis encompassed both environmental and social risks with the following labour risks and modern slavery indicators considered:
 - Forced Labour
 - Child Labour
 - Excessive overtime
 - Hazardous working conditions
 - Irresponsible use of agency labour
 - Underpayment or non-payment of wages and benefits
 - Undisclosed subcontracting
 - Discriminatory practices
 - Lack of representation (e.g. the right to bargain collectively)
3. We are now in the ongoing process of further examining identified categories through desktop research and engagement with external experts with an aim to create detailed heatmaps of category risks which will inform our ongoing actions to address these risks.

To inform our relationship to harm and organisational response, we refer to the United Nations Guiding Principles (UNGP) 'continuum of involvement' to determine whether we may cause, contribute to, or be directly linked to harm and apply our understanding of these concepts and how they may apply to our organisational in the section below. As a business we commit to taking prompt, reasonable and proportionate action if we become aware of modern slavery.

	Cause	Contribute	Directly Linked
Definition	A company may cause modern slavery if its own acts or omissions directly result in the modern slavery occurring	A company may contribute to modern slavery if its own acts or omissions are significant in facilitating, encouraging, or enabling another party to cause a situation of modern slavery	A company may be directly linked to modern slavery by its operations, products, or services through a business relationship

3.4 | Prioritised risk areas

Within the context of our vehicle supply chain, the following categories identified reflect where increased potential for risk factors exist within our **operations** and **supply chain**. These risk areas will be included in our updated risk register, using the UNGP continuum of involvement to inform the level of risk flagged.



3.4.1 | Operational risks

While modern slavery risks in our direct operations are low due to our policies and systems to comply with regulations and support staff wellbeing; we acknowledge that our reliance on subcontracted labour to provide diversified services (such as cleaning, driving and repairs) limits our visibility into the wages and conditions of these workers.

We monitor and address potential risks to our crew, implementing a comprehensive set of policies that

address staff well-being, even during unprofitable periods. Additionally, we have invested in enhancing the capabilities of our Health, Safety & Wellbeing team and re-evaluating our approach to Equality, Diversity & Inclusion. In the upcoming year, we will take steps to enhance our oversight of indirect labour with an expectation that all individuals contributing to our daily operations are appropriately remunerated and treated with dignity, respect, and inclusivity.

Diversified service support		
Risk factors	1. Workforce vulnerability	Cleaning, maintenance, and security
Description	<p>At <i>thl</i>, we rely on a subcontracted labour-force to deliver diversified service support including maintaining our rental vehicles as well as our facilities.</p> <p>These services are reliant on a base-skill labour in which temporary and irregular nature of work is exacerbated by low profit margins leading to increased risk and opportunity for exploitation of the workforce employed. The prevalence of migrant workers within these industries also increases the risk of practices such as debt bondage and visa exploitation.</p>	
Relationship to UNGP	<p>Contribute to</p> <p>We recognise that we have a responsibility to define appropriate costs and timings when negotiating contracts to limit downward pressure that may contribute to modern slavery risks.</p>	
Controls	<p>Some of our business units have already taken steps to verify that cleaning suppliers have appropriate policies and controls in place to adequately prevent modern slavery in their supply chains. In our current procurement process in Australia, we have reviewed suppliers policies and practices relating to modern slavery.</p>	
Actions	<p>Within the next financial year, we have a clear goal to begin reviewing purchasing practices around diversified service support to verify that staff are recruited ethically and remunerated appropriately.</p>	

Contracted Drivers		
Risk factors	1. Workforce vulnerability 2. Business models that increase risk to people	Drivers contracted through third party recruiters or directly
Description	<p>To respond effectively to fluctuations in customer demand, we rely on subcontracted labour to meet requirements relating to vehicle manufacture and facilitation of tours and expeditions. We are conscious that the use of third-party recruitment decreases our visibility over of our workforce and carries additional risks associated with debt bondage or visa exploitation.</p> <p>We also have a system in place where external drivers return our rental vehicles to designated locations and understand that we need to see that expectations around timing and safety are communicated effectively and individuals' rights are safeguarded.</p>	
Relationship to UNGP	<p>Cause Contribute to</p> <p>We recognise that informal workforce can lead to higher modern slavery risks and will focus this element of our business model on empowering and protecting individuals involved. We also understand our responsibility to minimise downward pressure on cost margins by defining appropriate costs and timings when negotiating contracts with third parties.</p>	
Controls	<p>We require our third-party recruitment firms to be licensed and to function according to our Code of Ethics and have a direct relationship with the drivers and workers contracted to provide services, and aim to provide them with equal access to all our grievance mechanisms. We have also taken steps to protect the safety and rights of individuals engaged in returning vehicles through agreements and stipends to eliminate any opportunity of exploitation.</p>	
Actions	<p>Within the next financial year, we will review and monitor the engagement with contractors, including contracted drivers with an objective of seeing that practices do not place unreasonable expectations on their engagement. We will also increase due diligence on third party recruitment firms to verify their worker arrangements.</p>	

3.4.2 | Supply chain risk

We understand that the goods and services that we procure have far-reaching impacts upstream and are working towards increasing our visibility of supply chain risks and augmenting our due diligence processes before when engaging suppliers.

Supply chain risk areas include:

Automotive vehicles, materials, and parts		
Risk factors	3. Procurement of high-risk categories of goods and services 4. Sourcing from high-risk geographies 5. Complex and opaque supply chain	Category – OEM: Vehicles Category – Materials: Exterior units, aluminium, and glass Category – Vehicles Parts: Tires, Batteries & Windscreens
Description	<p>The automotive supply chain is complex and there are often six to ten levels of suppliers between an automaker and the original source of the raw materials used in automotive products and spare parts.</p> <p>Raw materials commonly used in the automotive industry such as cobalt (used in electronics and lithium-ion batteries) and rubber (used for tyres and seals) are commonly sourced from 'high risk' countries. Additionally, the global auto industry remains heavily exposed to risks connected with forced labour within the Xinjiang region of China with some of greatest industry exposure relating to steel and aluminium used to make car frames, axels, bodies, engine casings, wheels, and brakes.³</p> <p>While <i>thl</i> procures automotive products and spare parts from reputable national and international suppliers, many suppliers do not obtain the raw materials used in their products and spare parts from the original source of extraction or manufacture. Ultimately, the limited traceability within the automotive supply chain means that <i>thl</i> is reliant on relationships formed with distributors to identify standard ethical practices.</p>	
Relationship to UNGP	<p>Directly linked</p> <p>We may be directly linked to modern slavery through the extended raw material supply chains and the industry's reliance on component parts sourced from high-risk geographies.</p>	
Controls	<p>We communicate our expectations to our tier one suppliers and look to verify their conduct through our Supplier Code of Conduct and self-assessment form. However, we are aware that we lack the insight into risks upstream of our direct suppliers.</p>	
Actions	<p>A key goal within our implementation roadmap is the development of a consistent and practical due diligence process alongside vertical mapping of key risk categories.</p>	

³Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region shuforcedlabour.org/drivingforce

RV Units and Living Equipment		
Risk factors	3. Procurement of high-risk categories of goods and services 4. Sourcing from high-risk geographies 5. Complex and opaque supply chain	Category – RV unit parts: Electrical Appliances Category – RV equipment: Exterior units, Aluminium, Glass, Linen
Description	The products purchased within these categories have complex multi-tiered supply chains from the extraction of raw materials to the manufacture of component parts. Notably, the use of aluminium, and glass also heightens the likelihood of upstream connections with Xinjiang region of China, increasing the potential for connection to state-imposed forced labour. ⁴ thl also offers linen for hire in its rental vans. While we are confident that our direct supplier operates responsibly, we recognise the risks associated with cotton sourced from high-risk countries, which places linen at a higher risk of being impacted by modern slavery. ⁵	
UNGP Continuum	Directly linked We may be directly linked to modern slavery through the raw materials sourced from high-risk geographies associated with these categories.	
Controls	Alongside reviewing our tier one suppliers, we have taken steps to review and change our linen supplier to work with a business with increased traceability over the raw material associated with their products.	
Actions	As stated above, a key goal within our 'Thrive' implementation roadmap is the development of a consistent and practical due diligence process alongside vertical mapping of key risk categories.	

Vehicle Services		
Risk factors	1. Workforce vulnerability 3. Procurement of high-risk categories of goods and services 5. Complex and opaque supply chain	Category – Vehicle services: Repairs, panel and paint, driving and detailing
Description	Services associated with vehicle repair (detailing, panel and paint, and repairs) are reliant on a base-skill labour in which temporary and irregular nature of work is exacerbated by low profit margins leading to increased risk and opportunity for exploitation of the workforce. The supply chains of these suppliers also include high-risk products including paint and glass.	
UNGP Continuum	Directly linked We may be directly linked to modern slavery through the long and globalised supply chain associated with these categories.	
Controls	We communicate our expectations to our tier one suppliers and look to verify their conduct through our Supplier Code of Conduct.	
Actions	Within the upcoming year, we will review our purchasing practices around vehicle repair services with a view to seeing that we are not contributing to additional pressure and verify that all staff are recruited ethically and remunerated appropriately.	

Consumables		
Risk factors	3. Procurement of high-risk categories of goods and services 5. Complex and opaque supply chain	Category – Consumables: Tools, Decals, Cleaning Products, Fuels and Oils
Description	Our reliance on consumables (including cleaning products, fuels, and oils) increases our potential for modern slavery risks due to the low visibility over the multi-tiered supply chains related to these products. Our procurement of fuels and oils increases our exposure to multi-faceted risks associated with economic, political, and cultural contexts specific to the extraction of resources and the industry's reliance and demand for migrant and base-skilled labours.	
UNGP Continuum	Directly linked We may be directly linked to modern slavery through the raw materials sourced from high-risk geographies associated with these categories.	
Controls	We communicate our expectations to our tier one suppliers and look to verify their conduct through our Supplier Code of Conduct. However, we are aware that we lack the insight into risks upstream of our direct suppliers and this is noted as a risk in our Enterprise Risk Management system.	
Actions	A key goal within our implementation roadmap is the development of a consistent and practical due diligence process alongside vertical mapping of key risk categories.	

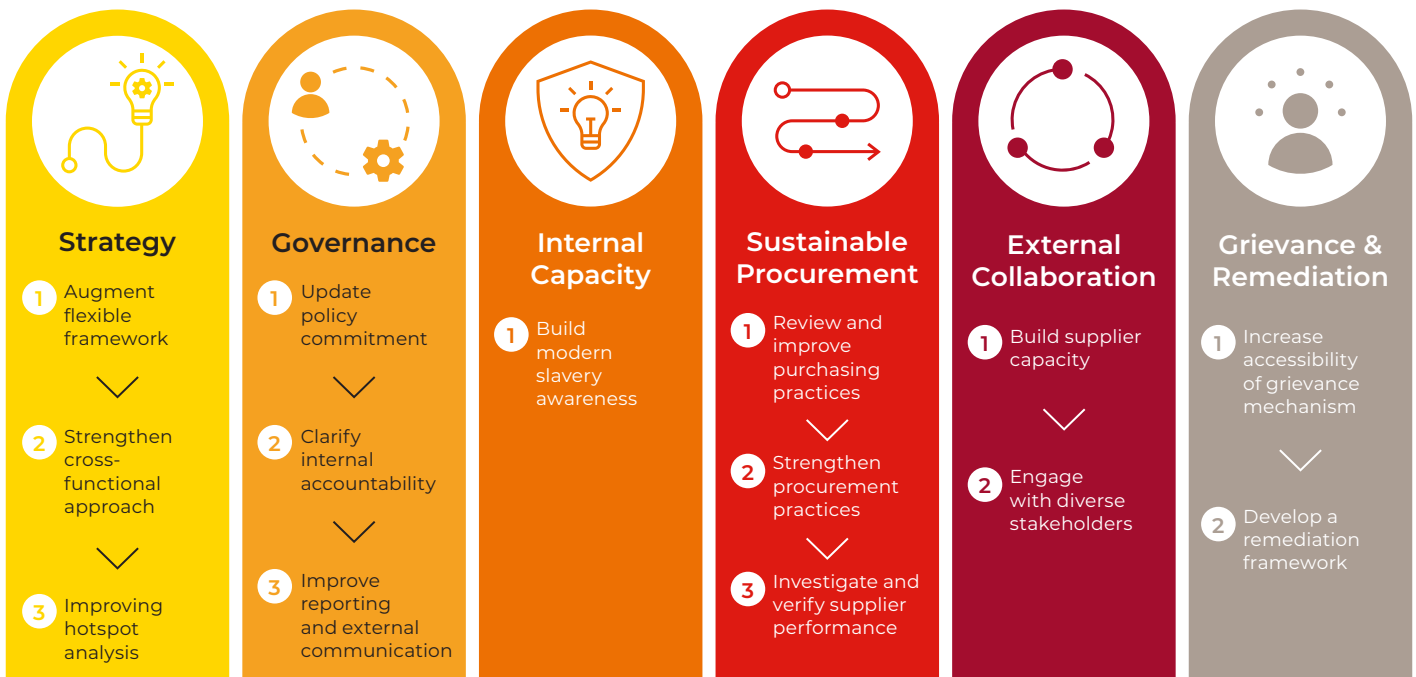
⁴Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region shufordlabor.org/drivingforce

⁵Walk Free Foundation: Global Slavery Index www.walkfree.org/global-slavery-index/

4

Addressing and Mitigating Risks

4.1 | Organisational approach



Our organisational commitment to ‘do the right thing’ extends beyond legal compliance but reflects our desire to contribute to a future that is environmentally restorative, socially just and economically inclusive. In this sense, supporting the rights of individuals impacted by our business activities, from our customers and crew to the people employed within our supply chain, is fundamental to our business purpose and a core aspect of sustainability strategy and future-fit mindset.

This year we engaged Edge Impact, a specialist external consultancy, to review our approach and support the development of a clear roadmap of actions. Throughout

this process, we’ve identified six focus areas that form the basis of our efforts to combat modern slavery (see diagram above).

Our objective is that modern slavery mitigation is addressed in a comprehensive and collaborative manner, where risk to people is placed alongside risk to business. Our ‘Thrive’ implementation roadmap is also aligned to these areas, allowing us to measure and track and effectiveness of our goals and actions and drive continuous improvement.



4.2 | Strategy

Our efforts to combat modern slavery risk are not confined to a single area of our business but a core component of our future-fit sustainability strategy, which guides our organisational direction and decision-making processes.

4.2.1 | Our approach: a future-fit mindset and methodology

Overarching strategic framework

Over the last three years we have focused on embedding a science-based, systems focused sustainability framework throughout our organisation which provides us with a foundation to address modern slavery risks at a global, country and branch level. By committing to the Future-Fit Business Benchmark we have both a mindset and methodology for prioritising our risk areas, creating actions to progress our maturity in this space and aligning goals to indicators and frameworks.

Clear methodology and metrics

Referencing Future-fit's Action Guides, we've committed to 23 Break-Even Goals that place the protection of people within our workplace and supply chain as an organisation-wide priority. For each goal, we've worked with our internal team to understand the ambition, actions, assessment (progress indicators and context indicators) as well as what evidence is required to assure progress.

The Break-Even goals (outlined in the FY23 Highlights section of this Statement) reflect indicators and drivers necessary to mitigate modern slavery risks and provide a clear evidence-based approach to benchmark and track progress. Goal BE04 – Procurement safeguards the pursuit of future-fitness – is a priority goal for **thl** and is discussed in more detail in the Risk Methodology section of this Statement.

We have made significant progress, through a pilot-and-scale model, to integrate these workstreams at country and business unit level, and in branches through future-fit Branch Action plans, and report on these within our annual integrated report found which can be found here.

External review conducted to identify organisational gaps and opportunities

In May 2023, we commissioned Edge Impact to undertake a 'Gaps and Opportunities Analysis' of our policies, processes and practices alongside stakeholder sessions with representatives from different regions and business groups. The findings from this analysis were presented in a three-year implementation roadmap to provide insight into how we can specify and strengthen our current strategy to reduce risk more effectively.

Challenges and opportunities

We recognise that **thl's** modern slavery risk profile is constantly evolving as our business grows and external factors change (such as conflict, displacement, global pandemics etc) within our supply chain. With this in mind, we will consistently review and update the targets, metrics, and data sources used to define our strategy. We will also engage with diverse stakeholders, including suppliers, workers, and third parties, to gain a contextual understanding of risks we've identified within our prioritisation activities (listed in section 3.3). We are committed that our strategic approach to due diligence aligns with the dynamic nature of globalised supply chains.

Strategy goals:

- **Goal 1:** Augment strategic framework to strengthen modern slavery focus within sustainability goals
- **Goal 2:** Strengthen cross-functional approach through internal and external engagement
- **Goal 3:** Improve strategic analysis of priorities areas



4.3 | Governance

Our governance structure and policy framework underpin our efforts to mitigate modern slavery risk by aligning expectations with staff and suppliers and allocating oversight so that our principles and processes are implemented consistently.

4.3.1 | Our approach: mitigating risk through clear accountability and commitment

Clear internal accountability

We have established clear lines of accountability for managing modern slavery risks, escalating and responding to suspected incidences, and operationalising due diligence measures. These are reflected in three core groups, including:

Name	Description
Governance and Ethics Committee (GEC)	The role of GEC is to provide 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 CEO, CFO, CRO, CPCO and additional COOs relating to the relevant region or business area.
Responsible Management Team (RMT)	The internal team responsible for seeing that our modern slavery implementation roadmap is operationalised across the relevant regions and business units.
Global Sustainable Procurement Working Group (GSPWG)	A group of internal procurement champions representing the key jurisdictions in which we operate: NZ, AU, US, CA, UK, EU. The group is responsible for implementing our sustainable procurement strategy.

Clear policy commitment

As part of our commitment to ethical business, we have implemented comprehensive policies and processes that enable us to proactively anticipate and mitigate negative supply chain impacts, including the risk of modern slavery. These policies were reviewed against international guidelines in May 2023 and will be continually updated to reflect our maturing approach:

Relevant policies include:

Policy	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	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.

Challenges and opportunities

We see a clear opportunity for internal accountability to extend beyond governing bodies and policies to be cascaded throughout our organisation, empowering individuals to take responsibility for due diligence within their operational responsibilities.

Governance goals:

- **Goal 1:** Update Code of Ethics
- **Goal 2:** Clarify internal accountability at operational level
- **Goal 3:** Improve internal and external reporting



4.4 | Internal Capability

At *thl* we have a renewed focus on investing in our crew to provide them with the right training, tools and support to do their jobs safely and effectively. We are committed to equipping our employees with the knowledge and skills required to mitigate modern slavery in their operational roles.

4.4.1 | Our approach: investing in our crew to build capability

Sustainable Procurement Training

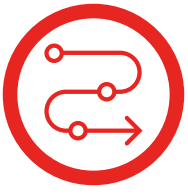
In addition to our Sustainable Procurement training module, we provide a monthly meeting to all key procurement staff where we deliver training on sustainable procurement principles and practices, aligned with our Flexible Framework goals. We also have a unified approach to identifying risks to people within our supply chain and taking action to build capacity with our suppliers to address them.

Challenges and opportunities

Building modern slavery awareness is a key opportunity for growth for our organisation in the coming year. During our stakeholder sessions in 2023, we've established that while crew are unified in their desire to make an impact, there's a need for general base-line training to increase understanding and upskill crew. We will take proactive action to address this knowledge gap by including this as sustainable procurement training priorities for key operational roles, so that modern slavery is a key element of our refreshed sustainable procurement training module, and providing targeted training to build internal capacity of Board members and senior management.

Internal Capability goals:

- **Goal 1:** Build modern slavery awareness



4.5 | Sustainable procurement

Our Sustainable Procurement framework and implementation programme allows us to identify, prioritise and mitigate modern slavery risks within our supply chain and build capacity with our suppliers so that they meet our values of contributing to a future-fit society.

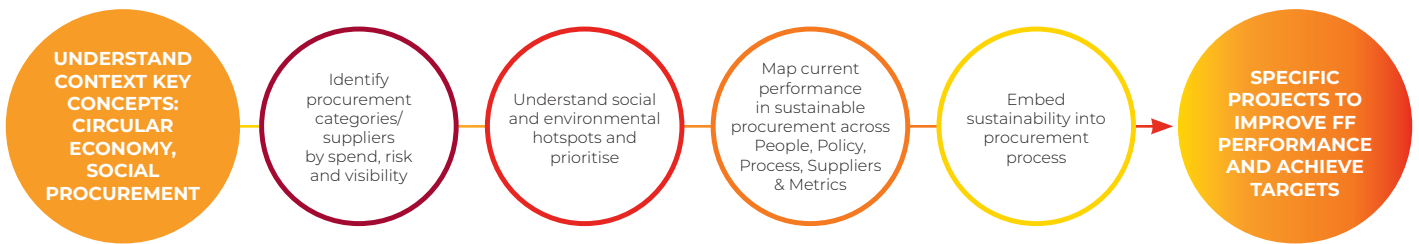
4.5.1 | Our approach: building maturity in sustainable procurement

Sustainable procurement framework

A key goal as a future-fit business is to reduce – and eventually eliminate - any negative environmental and social impact caused by the goods and services our organisation depends upon, by continuously striving to anticipate, avoid and address issue-specific hotspots in its supply chains. With this long-term vision in mind, we've developed a Global Sustainable Procurement 'flexible framework' to continuously improve our understanding of our supply chain risks and our measures to mitigate them. It summarises five levels

from Foundation (Level One) to Lead (Level Five) with annual milestones covering: *Future-Fit Goals, People, Policy, Strategy & Communications; Procurement Process; Suppliers; and Measurement & Results.*

In FY22 we achieved Level One – Foundation of our Sustainable Procurement Framework and this year worked to achieve Level Two – Embed for sustainable procurement throughout the business. See our [FY22 Integrated Annual Report](#) page 60 and [FY23 Integrated Annual Report](#) page 36 for more information.



Aligning expectations

In FY23, we implemented and rolled-out a Supplier Code of Conduct (SCOC) setting out expectations for our suppliers. The SCOC is accessible on our sustainability website www.thlsustainability.com/suppliers and is accompanied by comprehensive set of resources to help build supplier capacity.

We have implemented a phased approach to require all existing suppliers to meet or exceed our Supplier Code of Conduct and are requiring all new suppliers to align with our SCOC before onboarding. Suppliers must undertake a self-assessment and if necessary, provide and meet a Resolution Plan.

Cross-functional oversight

A Global Sustainable Procurement Working Group has been established to embed a consistent approach. This

includes reviewing social and environmental hotspots for supplier categories using the Future-Fit Procurement Hotspot guide.

Challenges and opportunities

A core challenge associated with addressing our modern slavery risks within these categories is our lack of leverage to influence the manufacturers that monopolise the market and our degree of separation from risks that are inherent in the extraction of raw material and the manufacture of component parts. There is no simple solution to these issues, but we understand our need to map beyond tier one of our supply chain to begin gaining transparency of our upstream risks and will strive to increase our leverage through collaboration with industry peers and advocacy at government levels.

Sustainable Procurement goals:

- **Goal 1:** Review and improve purchasing practices
- **Goal 2:** Strengthen procurement processes
- **Goal 3:** Investigate and verify supplier performance



4.6 | External collaboration

We recognise that engaging and collaborating with diverse range of stakeholders is crucial to expanding our understanding and capacity to combat modern slavery within our industry.

4.6.1 | Our approach: proactive collaboration

Industry engagement

As a global RV and tourism market leader, we are invested in engaging with our peers to build capacity within our industry. For this reason, we aim to connect with peer businesses and industry organisations to drive meaningful change through a collaborative approach.

Supplier engagement

We have long-standing partnerships with our suppliers with an emphasis on clear two-way communication and consistent dialogue. We prioritise capacity-building rather than a compliance mindset. This was reflected in the recent roll-out of our SCOC, in which our procurement team solicited feedback from suppliers on a draft version of the code to gain their perspective

on the effectiveness and suitability of questions. We engaged with key suppliers around our expectations, and to unpack any issues relating to complying with our requirements and worked collaboratively as they completed their SCOC self-assessments and improvement plans to build capacity to mitigate these issues.

Challenges and opportunities

We place high importance on the input and feedback from our employees, suppliers, and customers, and communities. Moving forward, we are committed to expanding our efforts by actively seeking and incorporating more targeted perspectives from diverse range of stakeholders (such as workers within our supply chain, non-profit organisations, survivor leadership and external experts)

External Collaboration goals:

- **Goal 1:** Build supplier capacity
- **Goal 2:** Engage with diverse stakeholders e.g. Supply Nation in Australia



4.7 | Grievance and remediation

We recognise the rights of individuals impacted by our business and the need to provide opportunities and multiple channels so that concerns can be actively raised, impartially judged, transparently addressed, and effectively remediated.

4.7.1 | Our approach: accessible reporting and active response

Internal grievance process

Understanding, responding, and addressing concerns allows us to support our crew to live the **thl** values every day. We are committed to improving this culture and revised our 'Speak Up Policy' in FY23 to better represent and reflect our desire to create a safe culture where our crew are comfortable to speak up. Our internal Speak Up process involves 4 steps as outlined below depending on the nature of the disclosure:

1. Talk to the individual if possible
2. Talk to your Manager if possible
3. Talk to your Chief Operating Officer (COO) or HR representative where applicable
4. Use **thl**'s dedicated confidential **SpeakUp** platform

External ethical reporting service

We've also introduced access to an External Ethical Reporting Service administered by Report It Now (RIN), an independent global provider who operates a secure ethical case management software platform called EthicsPro™.

A link to this platform has been embedded on within our SCOC and suppliers and their employees are able access and report concerns anonymously using this platform. We are yet to receive a grievance that indicates serious exploitation but are actively taking steps to monitor and report on any incidences that occur.

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:
ethicspro.reportitnow-global.com/THL

Online at ethicspro.reportitnow-global.com/THL

Escalation process

Any issues that include ILO modern slavery indicators or examples of labour rights abuses will be escalated to our Governance and Ethics Committee. While the GEC has responsibilities for oversight of remediating these concerns, each of the **thl** executives and their leadership teams have ultimate accountability, and all business units must demonstrate their commitment to providing access to listen to concerns raised by employees or individuals within our supply chain or impacted communities.

Challenges and opportunities

While our grievance mechanism is available to all individuals, we recognise that workers within our supply chain may have limited visibility or awareness of its existence. With this in mind, we will take steps to increase the accessibility of our grievance mechanisms by engaging with intended users to modify design and considering avenues to increase visibility to vulnerable workforces.

We also understand the need to have remediation frameworks in place so that we can effectively respond to any incidence on modern slavery with measures to safeguard the individual and correct the harm experienced. In the coming year, we'll prioritise developing this resource and the establishing the partnerships with third parties required to enact it.

Grievance and Remediation goals:

- **Goal 1:** Increase accessibility of grievance mechanism
- **Goal 2:** Develop a remediation framework

5

Measuring Effectiveness

We are on a journey to continuously improve our response to modern slavery risks and strengthen our efforts to safeguard individuals within our supply chain and operations. To guide this process, we have created a clear implementation roadmap outlining fourteen

separate goals and forty-five sub-steps. Each sub-step has been prioritised and mapped to a three-year timeline and relevant KPI have been aligned to track and measure progress. The following table provides an overview of the goals and sub-steps for our next reporting timeframe.

5.1 | Actions for FY24



STRATEGY

- Goal 1 | Augment *th/* Flexible Framework** (five year sustainable procurement plan) to integrate modern slavery actions.
- Goal 2 | Strengthen cross-functional approach** e.g. by having modern slavery as a standing item for the Global Sustainable Procurement Working Group.
- Goal 3 | Improve future-fit supplier hotspot analysis** to include areas highlighted within our 2023 Gaps and Opportunities Report.



GOVERNANCE

- Goal 1 | Update policy commitment** – update Code of Ethics and internal policies to reflect a stronger human rights commitment, creating clearer internal expectations and obligations for crew conduct.
- Goal 2 | Clarify internal accountability** for modern slavery mitigation.
- Goal 3 | Improve reporting and external communication** including data gathering.



INTERNAL CAPACITY

- Goal 1 | Build modern slavery awareness** including developing mandatory sustainable procurement training modules for all levels of business which clearly defines modern slavery, risks, indicators, obligations, and organisational response.



SUSTAINABLE PROCUREMENT

- Goal 1** | **Continue to improve purchasing practices**, contractor management and supplier engagement.
- Goal 2** | **Strengthen procurement practices:** so there is consistent sustainable procurement across the full plan, source, manage cycle particularly for high-risk categories. Improve supplier / spend data data gathering and reporting and transparency.
- Goal 3** | **Investigate and verify supplier performance:** continue roll-out of Supplier Code of Conduct, review supplier resolution plans, consider process to introduce anti-modern slavery conditions over time.



EXTERNAL COLLABORATION

- Goal 1** | **Build supplier capacity** around sustainability and modern slavery.
- Goal 2** | **Increase engagement with diverse suppliers and stakeholders.**



GRIEVANCE & REMEDATION

- Goal 1** | **Increase accessibility of grievance mechanism**, promote to suppliers and contractors and monitor.
- Goal 2** | **Develop a remediation framework** by defining triage process.

6

Conclusion

At **thl**, we acknowledge that we are only at the beginning of our journey towards combating modern slavery. We understand the challenges posed by our expanding operations and complex supply chain and will endeavour to learn and evolve by tracking the effectiveness of our initiatives and collaborating with affected stakeholders. As protecting the rights and dignity individuals throughout our value chain is central to our values and core to our organisational purpose, we are committed to iterative and ongoing improvement.

If you have any questions, concerns, or feedback we encourage you to reach out to our team for additional information by contacting Juhi Shareef, Chief Responsibility Officer at **thl**, at juhi.shareef@thlonline.com

This Modern Slavery Statement is approved by [the board of Tourism Holdings Limited] (being the principal governing body and higher entity of each reporting entity).



Cathy Quinn ONZM

Chair



Annexure A

Material trading entities within the **Tourism Holdings Limited Group**

Waitomo Caves Limited (New Zealand)

Action Manufacturing Group GP Limited (New Zealand)

TH2Connect GP Limited (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)

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)

JJ Motorcars 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)