



# Modern Slavery Statement 2024

Financial Year ending 30 June 2024



*TAD HoldCo Pty Limited  
(ACN 637674376)  
15 Wollongbar Street  
Byron Bay NSW  
Australia*

## ABOUT THIS STATEMENT

This Modern Slavery Statement (Statement) has been prepared to meet the requirements of Section 14 of the Australian *Modern Slavery Act 2018 (MSA)* and covers the period 1 July 2023 to 30 June 2024 (the reporting period).

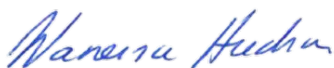
This Statement is a joint Statement and covers the following three reporting entities: Trip A Deal Pty Ltd (ACN 149240433), which is a wholly owned subsidiary of Trip A Deal Holdings Pty Ltd (ACN 617898263), which is also a wholly owned subsidiary of TAD HoldCo Pty Ltd (ACN 637674376) (**TAD HoldCo**).

The information set out in this Statement is provided as a consolidated description for all entities covered by this Statement, except where information is identified as relevant to specific reporting entities.

References to 'Trip A Deal' and the terms 'we' and 'our' are used in this Statement to refer collectively to all the entities covered by the Statement. Unless otherwise noted, statistics and numerical information are correct as of 30 June 2024.

Prior to Board approval, this Statement was prepared and reviewed by the Trip A Deal Chief Financial Officer, the Head of People and Culture, and endorsed for approval by the Chief Executive Officer. An independent specialist business and human rights advisory firm also supported the drafting process.

This Statement was reviewed and approved by the TAD HoldCo Board on behalf of all reporting entities (acting as a higher entity under the MSA) on 13 December 2024 and is signed by a Director of the TAD Hold Co Board.



13 December 2024

Vanessa Hudson

Director, TAD HoldCo

## CEO'S MESSAGE

As one of Australia's leading online travel agents, helping approximately 100,000 travelers annually achieve their travel dreams in more than 100 countries around the world, we recognise the important role we can play in the global effort to combat modern slavery.

We have a global reach and aim to contribute positively to the people, planet and communities in which we operate and source from. This includes seeking opportunities to partner with others who share our commitment to ethical and sustainable tourism practices.

At the end of the reporting period covered by this Statement, Trip A Deal was fully acquired by the Qantas Group. This acquisition allows us to combine Qantas and Jetstar's extensive network with our curated tour market offerings. Trip A Deal continues to operate as an independent business within the Qantas Group, while leveraging the Group's broader risk management tools and processes.

This Statement sets out how we work to understand and respond to potential modern slavery risks in our operations and supply chain. Going forward, our key area of focus is seeking to align our modern slavery risk management processes where appropriate, with the broader Qantas Group's approach to addressing modern slavery. We anticipate that over time, this may include aligning elements of our framework in the areas of policies, supplier due diligence, risk assessment and training for our people.

While our efforts over the reporting period were constrained by the acquisition activity, we understand the importance of continuous improvement in this area and recognise there is more to be done to enhance our approach to modern slavery risk management. We look forward to continuing to provide updates in future years regarding our progress in these areas.



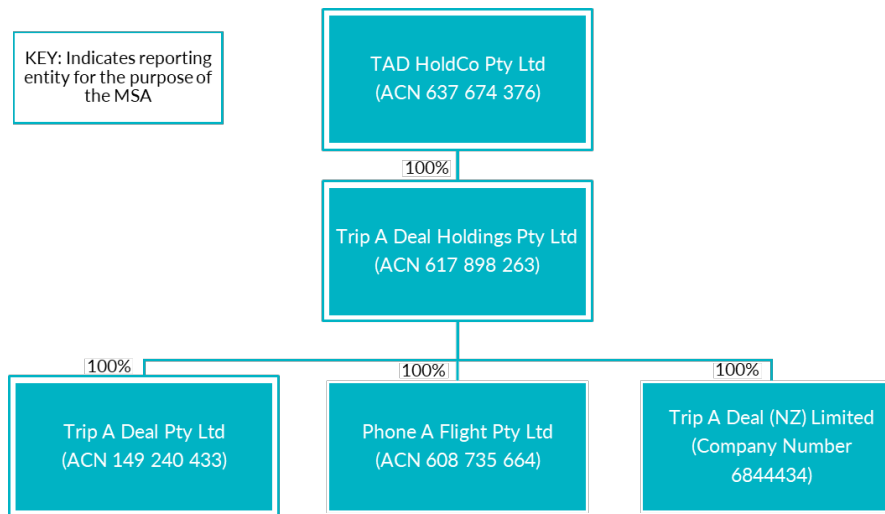
13 December 2024  
Matthew Wolfenden  
CEO, Trip A Deal

## 1. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Our Structure and Operations

Trip A Deal is an Australian based travel business established in 2011. Trip A Deal Pty Ltd is the only trading entity in the group and is also the employing entity. Trip A Deal Pty Ltd is a wholly owned subsidiary of Trip A Deal Holdings Pty Limited, which is wholly owned by TAD HoldCo Pty Ltd.

TAD Holdco Pty Ltd (and its subsidiary entities) was wholly acquired by Qantas Frequent Flyer Limited, which is wholly owned by Qantas Airways Limited, on 28 June 2024. Trip A Deal continues to operate as an independent business working with a range of travel partners.



Trip A Deal is headquartered in Byron Bay, New South Wales. Trip A Deal also operates office locations in Brisbane and the Gold Coast (Queensland, Australia) and Denpasar (Indonesia).

Trip A Deal offers travel packages and products for both domestic and international travel to a diverse client base across Australia. Our reach extends to over 100 countries through a selected supply chain of travel operators in these destinations.

Our travel products and services include organised packages that include accommodation, tours, activities, flights, cruises, transfers and other associated travel product and service offerings. These products and services include luxury, small group, and special interest offerings and are provided by third parties and are not delivered by us. Our key destinations include Japan, Europe, Southeast Asia, India, North America, Egypt, Jordan and Turkey.

At 30 June 2024, Trip A Deal employed 160 employees in our Australian based operations. The majority of our Australian based employees are engaged through individual employment agreements. Approximately 90% are full-time employees and 10% are part-time. Our office in Indonesia operates as an online travel agent primarily focused on identifying and procuring travel products for retail. We have three full time employees based in Indonesia and do not engage any other workers in Indonesia.

## Our Supply Chains

Trip A Deal procures a range of products and services through a diverse supply chain, to support our core business activities. The nature of our supply chain over the reporting period did not change substantively from our previous Statement. While the majority of our total non-travel related procurement spend on business products and services is within Australia, we recognise that the country of spend may not always correlate to the country of origin of the manufactured product.

The core of our business is the provision of tours, flights, hotels and cruise packages. We engage a range of providers to deliver travel and tourism-related products and services to our customers. As outlined in the breakout box below, this includes approximately 370 suppliers who provide services in our travel products and packages, based in 105 countries (excluding airlines).



*The figures in this box relate to our spend in relation to travel and tourism related products and services and do not include spend in other areas, such as office supplies.*

Our supplier base includes a diverse range of suppliers. For example, through our travel-related procurement, we partner with suppliers ranging from small, local, family-operated businesses to larger tour and travel product and/or ancillary service providers. We do not engage any of the tour operators as part of our direct workforce, and their services are provided by their own workforce and subcontractors directly.

We hold formal contracts with most of our travel-related suppliers. Our contractual agreements and our long-standing relationships with many suppliers mean that we typically engage with them directly on a regular basis.

## 2. RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

### Understanding Our Risk Profile

The Australian Government defines modern slavery as situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. This can include practices such as human trafficking, forced labour, debt bondage, and the worst forms of child labour.

As outlined below, we recognise that the travel sector in Australia and globally involves a range of modern slavery risks, including due to geographic, sector, and product and services specific risk factors. These risk factors help us identify and understand potential modern slavery risks in our operations and supply chains.

### Geographic Risk Factors

Our diverse global footprint means our exposure to modern slavery risks may vary by geography. We recognise that the reported prevalence of modern slavery varies across the countries and regions where our partners deliver travel and tourism-related services.

### Sector, Product and Services Risk Factors

We understand that certain sectors (and the products and services they involve) which are part of the travel and tourism value chain can be associated with a higher risk of modern slavery practices. For example, the travel and tourism sector is closely associated with services such as cleaning and hospitality which can involve modern slavery risks. In some cases, there may also be a higher proportion of vulnerable workers including migrant workers on cruise ships; or a reliance on seasonal and temporary workers to meet fluctuations in demand in some locations.

## Our Modern Slavery Risks

In identifying our modern slavery risks, we have considered the UN Guiding Principles on Business and Human Rights' (UNGP's) continuum of involvement, which outlines three ways businesses may potentially be involved in human rights harm, such as modern slavery.

- *Cause*: Businesses may be involved in modern slavery where their actions or omissions directly result in modern slavery occurring. For example, a tour company could cause modern slavery if it engaged migrant workers to undertake basic tour vehicle maintenance and cleaning, confined these workers to a local depot, and confiscated their passports to prevent them leaving.
- *Contribute*: Businesses may contribute to modern slavery where their actions or omissions significantly facilitate or incentivise modern slavery to the extent that the exploitation would have been unlikely to occur without them. For example, a hotel could contribute to modern slavery if it contracted a company to provide cleaning services and required the company to reduce costs to a level that could only be met by exploiting its workers.
- *Directly linked*: Businesses may be directly linked to modern slavery where their products, services or operations are directly linked to exploitation carried out by a third party, such as a supplier. For example, a travel company could be directly linked to modern slavery where it sources IT systems to manage bookings which have been manufactured by a supplier using components produced by a third supplier through modern slavery.

Considering our risks through this cause, contribute, directly linked continuum helps us to understand the different ways modern slavery could occur across our operations and supply chains and how we and other entities in our supply chain could be involved.

The table below outlines key modern slavery risks for the travel and tourism industry which may be relevant to our own operations and supply chains. As outlined in the next section of this Statement, we are taking a range of steps to manage these potential risks and plan to expand our response over coming reporting periods, including through seeking greater alignment of policies and process with the Qantas Group. This table is not exhaustive, and we also recognise that our modern slavery risk profile is not static and may evolve in response to internal and external factors.

### Modern slavery risks in our direct operations

As set out in the table on the following page, we do not consider our direct operations to involve significant modern slavery risks.

Due to the nature of our operations, our staff in Australia and Indonesia undertake white collar, office-based roles. Australian based employees have a contract of employment that is based on the National Employment Standards. Those covered by a Modern Award, are made aware that they are covered by an Instrument and their relevant classification level in their employment contracts. The Company recognises the Award sets out the minimum terms and conditions of employment on top of the National Employment Standards. Our Indonesian employees are engaged under individual employment contracts that exceed minimum conditions as required per the Company Regulations and Indonesian Manpower Legislation. Talent acquisition activities are performed in-house rather than through third party recruitment firms, which helps ensure we have visibility of the full recruitment process.

We undertake periodic reviews of modern awards and employment contracts for our Australian and Indonesian employees to check that all entitlements of employees are being met and that all employees are remunerated fairly and correctly.



### Modern slavery risks in our supply chain

POTENTIAL RISKS FOR THE TRAVEL AND TOURISM SECTOR	RELEVANT RISK FACTORS	HYPOTHETICAL EXAMPLE	HOW WE COULD BE INVOLVED
Workers engaged by third parties to provide services to support tour activities (such as hospitality and cleaning) could be exploited through modern slavery		Lower-skilled maintenance workers engaged to work on a cruise ship could be exploited through modern slavery (and may be particularly vulnerable to exploitation because they are unable to leave the vessel).	Directly linked
Products provided by third parties and used to support tour activities (such as catering or linen in hotels) could be produced using modern slavery		Food provided to tour participants by third parties during organised events (such as seafood) may have been produced using modern slavery.	Directly linked
Souvenirs sold to tour group members as part of organised tour activities could be made by third party sellers using modern slavery		The worst forms of child labour could be used to manufacture textile souvenirs.	Directly linked
Services provided by third parties to support travel companies' corporate operations could be provided using exploited workers		Subcontracted cleaning workers used at a corporate office (including in Australia) could be exploited through modern slavery.	Directly linked
Products provided by third parties to support travel companies' corporate operations could be produced using exploited workers		Building materials and furniture used in the refurbishment of a corporate office could be produced using modern slavery (such as bricks, timber and natural stone products).	Directly linked

RISK FACTORS KEY	High risk raw materials	High risk geographies	Use of low skilled labour	Use of migrant workers	Seasonal fluctuations in demand

### 3. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISK

#### Governance and Policies

Previously, the Chief Operating Officer was accountable for risk management, and policies and processes, including for modern slavery risks. Following the full acquisition of Trip A Deal by Qantas Airways Limited, on 28 June 2024, governance and policy settings are subject to change as part of the broader integration into the Qantas Group. We will include more detail on this when reporting on our FY25 activities.

Trip A Deal's existing policy framework to support the responsible operations of our business continued to apply over the reporting period.

For example, our Code of Conduct ('the Code') which applies to directors, employees, contractors, consultants and any other individuals representing Trip A Deal, irrespective of position or location, sets out the values we hold, and the standards of behaviour expected of us, and also touches on other Trip A Deal policies that are important to be familiar with regardless of seniority or role. The Code reinforces the need for us to always act in good faith and in Trip A Deal's best interests, while playing by the rules, irrespective of where we operate.

Importantly, the Code explains our expectation that our people follow relevant laws (which would include laws relating to modern slavery) and report concerns appropriately, which could include potential issues relating to modern slavery.

We understand our reputation relies on the business conduct of every individual representing us. We are responsible for our actions as individuals, as team members and as an organisation. Working together, supporting one another, adhering to this Code, speaking up about any breaches and asking for guidance when we need it helps us maintain our focus on doing business responsibly. To reinforce this message, all team members participated in a Standards of Conduct training course.

Our directors, employees, contractors, consultants and any other individuals representing Trip A Deal are required to read and accept the Code, participate in mandatory training and breaches of the Code may result in disciplinary action or cessation of contract for service.

## Training and Awareness

Training and awareness raising is a key part of modern slavery risk management. As part of our integration into the Qantas Group, all Trip A Deal team members will be required to complete the Groups' required learning, including the online Acting with Integrity training, which includes a module on modern slavery. The training includes information about types of modern slavery practices and their prevalence, groups who may be vulnerable to exploitation, and how to spot and report modern slavery red flags. The module also includes a series of knowledge check questions based on practical scenarios. We will also consider if additional awareness raising with our people around modern slavery risks specific to the tourism sector is required.

More broadly, during the reporting period, all new and returning employees are required to attend orientation (training) at the commencement of employment/engagement (and keep up with periodic updates) about our Code of Conduct, which includes guidance about reporting concerns. We may further revise our orientation processes as part of our integration into the Qantas Group, including considering how specific information about modern slavery could be included in our orientation training.

All employees, including prior to our full acquisition by the Qantas Group, also complete certain mandatory Qantas Group training, such as Safety and Security Awareness training. The Safety and Security Awareness training includes information about human trafficking, including potential indicators and how to report concerns or red flags. Employees also receive training on 'How we work in the Qantas Group' which provides an understanding of the purpose of the Qantas Group Policies, Group Beliefs, values and introduces the 8 Non-Negotiable Business Principles and the Code of Conduct and Ethics.

## Assessing and managing modern slavery risks

We understand that our ability to identify and manage potential modern slavery risks is key to an effective modern slavery response. During the reporting period, as part of the acquisition activity, an independent risk assessment was undertaken of Trip A Deals business operations to understand potential areas of exposure across specific risk areas, including in relation to modern slavery. Across FY25 we will explore opportunities to draw on the Group's broader modern slavery risk management approach and consider how we may be able to align, noting our differing business models.

During the reporting period, we included a modern slavery clause in our standard supplier contract templates. The clause requires the supplier to take reasonable steps to identify, assess and address modern slavery risks associated with the provision of the goods or services in their operations and supply chains. The clause also requires the supplier to take reasonable action to address any identified instances of modern slavery in connection with the performance of the contract. Going forward, our standard supplier contracting template will include the Qantas Group Supplier Requirements or the Qantas Group Compliance Statement (as appropriate and where applicable). Among other things, those documents include a detailed set of requirements in relation to 'human rights and working conditions', which encompass modern slavery, child labour and practices that contribute to modern slavery risks, such as charging of recruitment fees.

## Responding to modern slavery incidents

As outlined in this Statement, we understand there are a range of ways modern slavery can occur in the travel and tourism sector. To date, we have not identified any specific modern slavery concerns in relation to our business activities or those of our suppliers. However, we recognise that this does not mean modern slavery may not be occurring.

There are several ways in which we might become aware of a modern slavery incident or allegation. These include through our engagement with suppliers, as well as feedback from customers during or post-travel. Our standard practice is to seek feedback from customers about completed trips and any concerns they may have, which may provide an opportunity for them to flag concerns about any modern slavery red flags they may have witnessed.

Our Code of Conduct framework also provides a mechanism for our team members to report concerns, which could include issues related to modern slavery. If we became aware of a modern slavery incident or allegation, we would seek to leverage the internal human rights expertise of the Qantas Group's Business Integrity and Compliance team to determine the appropriate response, which may include seeking expert external advice and support.

#### 4. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We see an effective response to modern slavery as one where we can identify and address potential areas of modern slavery risk relevant to our operations and supply chain, including responding appropriately to any incidents we may identify. We also support responsible tourism and see action on modern slavery as one way we can support a more sustainable planet.

Our executive management team is responsible for overseeing our modern slavery response, which includes monitoring our effectiveness. Engaging with relevant staff from the wider Qantas Group involved in managing Qantas' modern slavery and broader human rights response has also informed our understanding of our effectiveness by assisting us to identify areas for further action and learn from Qantas' experience implementing modern slavery risk management actions. As we seek further alignment with the approach of the Qantas Group and our modern slavery response evolves, we will continue to consider how we can meaningfully assess the effectiveness of our actions.

## 5. PROCESS OF CONSULTATION

Each of the reporting entities covered by this Statement was consulted in the preparation of this Statement. These entities share a common management structure, including a common company secretary who was involved in the Statement process. The development of the Statement was also led by Trip A Deal's Chief Financial Officer, whose responsibilities span all of the reporting entities. This approach to consultation during the development and approval of the Statement has helped to ensure the Statement reflects key risks and actions relevant to all reporting entities.

In addition to the reporting entities, there are two owned or controlled entities in the corporate group which do not meet the reporting threshold. These entities are not trading entities and consultation with these entities also occurred through engagement with Trip A Deal's Chief Financial Officer, whose role also encompasses these owned or controlled entities. Additionally, key representatives from Qantas Group were also consulted in the preparation of this Statement. Qantas holds full ownership of Trip A Deal but Trip A Deal operates independently of Qantas. This Statement was also reviewed by a specialist business and human rights advisory firm.