



Modern Slavery and Human Trafficking Statement for Travelcube Pacific Pty Ltd Statement for Financial Year 2024

This statement is made pursuant to s.13 of the Australian Modern Slavery Act 2018 (“Modern Slavery Act”).

Travelcube Pacific Pty Ltd (the “**Company**”) is committed to ethical working practices and maintaining integrity and transparency in all dealings with employees, clients, business partners, suppliers, and authorities.

The Company understands that slavery can occur in several forms, including forced labour, workplace abuse, domestic servitude, child labour and human trafficking (“Modern Slavery”). We are committed to putting in place effective controls to safeguard against any form of Modern Slavery occurring within our business or supply chain.

Our organization

Operating under the HBX Group brand (“**HBX Group**”), the Company supplies Australian hotel rooms and ancillary products from Australia to other HBX Group group entities to be sold to customers located worldwide.

The Company is headquartered in Sydney (Australia) and employs 29 employees in Australia as of 30 September 2024.

Our policies

The Company operates a number of internal policies and practices to help ensure that we are conducting business in an ethical and transparent manner, including:

- **HBX Group Code of Conduct.** The Code of Conduct sets the framework around how the Company employees work together to deliver products and services globally. It gives clarity to employees and everyone the Company deals with about how the Company does business. It sets out what the Company stands for.
- **Environmental, social and governance policy.** This policy reflects the Company’s commitment to sustainable best practices in all aspects of the business, with a particular focus on employees, company culture, the environment and local communities.
- **Child Protection Policy.** This policy defines the Company’s commitment to child protection by setting out the actions and practices taken in order to contribute to the eradication of the Commercial Sexual Exploitation of Children and Adolescents.
- **Animal Welfare Policy.** This policy has been created to promote responsible practices among our suppliers to ensure best animal treatment practices, compliance with relevant national and international legislation and to meet clients’ expectations.



- [Supplier Code of Conduct](#). This code sets out the minimum standard of ethical conduct, values and principles the Company expects from suppliers, contractors and agents.

Our Suppliers and Third parties

HBX Group is a global network of 250k+ hotels and 23+ experiences in 170+ markets via our highly scalable platform. High-quality inventory sourced from our vast supplier network includes a large portfolio of c.100k directly contracted suppliers.

The Company requires its Suppliers to comply with the national, supranational and international legislation and related procedures, restrictions and sanctions in relation to human rights and labour law. We ask for the commitment of all the Company's Suppliers in supporting local communities, identifying and monitoring bribery and corruption risks, identifying and monitoring negative environmental impacts; and introducing/maintaining quality assurance and Health and Safety policies in their business. To monitor this, we have established a dedicated whistleblower channel for individuals who have identified human rights violations involving the Company or its Suppliers.

The HBX Group Supplier Code of Conduct sets out the minimum standards the Company expects from Suppliers in their relationships with workers, agents and customers throughout the supply chain and requires that Suppliers:

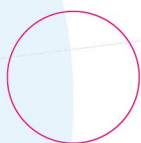
1. Adhere to International Labour Organisation by treating workers with respect and ensuring that relevant information on employee rights is easily accessible;
2. Will not employ anyone against their will, traffic, use forced, bonded, compulsory or prison labour;
3. Must ensure no slavery or human trafficking operates in their business or supply chain; and
4. Must ensure that employees have the correct visa and working documentation in place and ensure that written contracts for direct and contract workers exist.

As part of the Company's contract with suppliers, we require that they acknowledge and comply with the Modern Slavery Act, and at our request, provide us with any information or reasonable assistance to enable us to identify their supply chain. We reserve our right to terminate a supplier's contract in the event that any instances of Modern Slavery are discovered.

Training

The Company provides training, guidance and support wherever needed, enabling staff in key roles to identify and address potential Modern Slavery risks and infringements in this regard. This allows staff to be aware of what to do if they suspect that Modern Slavery is taking place within a supply chain, or within their business.

Monitoring





We will continue to monitor and improve our performance and success in preventing modern slavery and human trafficking from taking place in our business and supply chains by reference to reports and alerts from our staff, customers, suppliers, partners, the public, non-government organisations and law enforcement agencies.

Approval for this statement

This statement was approved by the Board of Directors on 31 March 2025

A handwritten signature in blue ink, appearing to read 'Mark', is placed above a horizontal line.

Director of Travelcube Pacific Pty Ltd