



SHANGRI-LA

Shangri-La Investments (Australia) Pty Limited

(ABN 15 146 016 033)

Modern Slavery Statement

Legislation: *Modern Slavery Act 2018* (Cth) (Modern Slavery Act)

Reporting Year: 2

Reporting Period: 1 January 2023 – 31 December 2023 (FY 2023)

Foreword from our Directors

Shangri-La Investments (Australia) Pty Limited (**Shangri-La Australia**) is a leading business in the luxury hotel, accommodation and hospitality space, operating two hotels in Australia, in Sydney and Cairns.

Shangri-La Australia forms part of the global Shangri-La Group, who own and/or operate over 100 luxury hotels and resorts in over 75 destinations in Africa, Asia, Europe, the Middle East, North America and Australia, and with 43,000+ employees globally (**Shangri-La Group**).

This is our second Modern Slavery Statement (**Statement**) under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**), covering the reporting period from 1 January 2023 – 31 December 2023 (**FY23**). While this Statement covers Shangri-La Australia, the Shangri-La Group's global values, policies and procedures continue to inform our response to addressing the complex issue of modern slavery in our operations and supply chains in Australia.

Shangri-La Australia continues to acknowledge that modern slavery and human trafficking is a global and complex challenge. This is especially true in relation to the hospitality industry we operate in, which has very large and complex supply chains compared to other sectors. Our core values include ethical business conduct, integrity and respect – addressing modern slavery risks in our operations and supply chains is important to ensure we are living up to our values.

The Shangri-La Group conducts its business globally with respect to our Global Code of Conduct and Ethics and Human Rights Policy, which underpin every aspect of our business. We value honesty and care in all our relationships and remain deeply committed to our social responsibility by making a positive contribution to our communities, environment, colleagues, guests and business partners.

Our second Statement under the Modern Slavery Act:

- **outlines the steps we are taking** at a global and local level to identify modern slavery risks and to assess and address these risks, including our Global Supplier Code of Conduct and our local efforts, such as the establishment of our Modern Slavery Working Group and providing modern slavery training for key staff;
- **identifies our key risks and priority areas that we will focus on moving forward** such as Shangri-La Australia's risks associated with our labour supply including our contracted cleaning services (e.g. housekeeping, laundry, dish cleaning), security services, massage services and restaurant services (e.g. waiters, cooks, etc.); and
- **sets out the steps we intend to take as part of our ongoing modern slavery compliance roadmap over the next few reporting periods** including more detailed risk mapping, training and education, implementation of our Anti-Modern Slavery Policy and rolling out detailed modern slavery risk assessments with key suppliers in line with our identified priorities.

The Shangri-La Group's global approach will continue to inform our emerging response to assessing and addressing modern slavery risks in our operations and supply chains, as Shangri-La Australia looks to take a continuous improvement and risk-based prioritised approach in following reporting years.

We are aware that the Modern Slavery Act is currently under review and the Australian Government has published its statutory review of the Modern Slavery Act. We are also aware that there have been other major developments in this space including the publication of the 2023 Global Slavery Index. We aim to continue to monitor and consider these key developments and other changes to the modern slavery regulatory landscape, and consider what implications these may have on our anti-modern slavery program moving forward.

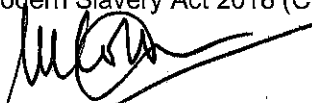
We look forward to reporting on our progress in future statements.

Principal Governing Body Approval

This modern slavery statement was approved by the Board of Shangri-La Investments (Australia) Pty Limited (ABN 15 146 016 033) in their capacity as principal governing body of Shangri-La Australia (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 17/06/2024.

Signature of Responsible Member

This modern slavery statement is signed by Michael Cottan in his role as Director of Shangri-La Investments (Australia) Pty Limited (ABN 15 146 016 033) (in accordance with section 13 of the Modern Slavery Act 2018 (Cth)) on 18/06/2024.



Michael Cottan - Director
18 June 2024

1. Criterion 1: Identify the reporting entity

- 1.1 The reporting entity is Shangri-La Investments (Australia) Pty Limited (ABN 15 146 016 033), with our registered office at Level 38, Tower Three, International Towers Sydney, 300 Barangaroo Avenue, Sydney 2000 (referred to as **we, us, our** or **Shangri-La Australia** in this Statement).
- 1.2 Shangri-La Australia is a reporting entity under the Modern Slavery Act and this Statement is submitted and published for the FY23 Reporting Period.
- 1.3 Shangri-La Australia makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.
- 1.4 Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities (**Commonwealth Guidance**) and the Modern Slavery Act Supplementary Guidance to help inform and guide our approach.

2. Criterion 2: Describe the reporting entity's structure, operations and supply chains

2.1 Our Structure

- 2.1.1 Shangri-La Australia is an Australian proprietary company limited by shares and is incorporated in Australia.
- 2.1.2 Shangri-La Australia's registered office is at Level 38, Tower Three, International Towers Sydney, 300 Barangaroo Avenue, Sydney 2000.
- 2.1.3 Shangri-La Australia is the parent company of Lilyvale Hotel Pty Ltd (which owns Shangri-La Sydney) and Shangri-La Hotel (Cairns) Pty Ltd (which owns Shangri-La The Marina, Cairns). Shangri-La Australia is also the holding company for Shangri-La Hotels Pty Ltd, however this entity provides management and marketing services, but does not have any employees on its payroll.
- 2.1.4 Across Sydney and Cairns, Shangri-La Australia has a staff headcount of approximately 652 staff.
- 2.1.5 Shangri-La Australia is part of the global Shangri-La Group, which owns and/or manages over 100 hotels globally under the Shangri-La, Kerry Hotel, JEN by Shangri-La and Traders Hotel brands.
- 2.1.6 The parent company for Shangri-La Australia is Shangri-La Asia Ltd founded in 1971 and headquartered in Hong Kong.

2.2 Our Operations

- 2.2.1 As per the Commonwealth Guidance, 'operations' refers to activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas.
- 2.2.2 Shangri-La Australia operates two hotels in Australia: Shangri-La Sydney and Shangri-La The Marina, Cairns. Our main operations include the provision of hotel accommodation and related services; food and beverage and catering facilities and services; concierge and valet parking services; leasing of office and commercial spaces; spa and wellness services and activities; and hotel management services.

2.2.3 As part of our operations, we run a variety of restaurant, spa and retail services. These are included in the table below:

Service name	Service type	Location
Altitude Restaurant	Food and beverage	Sydney
Café Mix	Food and beverage	Sydney
Blu Bar on 36	Food and beverage	Sydney
Harts Pub	Food and beverage	Sydney
Chi, The Spa at Shangri-La	Spa/ wellness	Sydney
Shangri-La Health Club	Wellness	Sydney
The Bradfield Lounge	Entertainment/ recreation	Sydney
Lobby Lounge	Food, beverage and tobacco	Sydney
Pier Shopping	Retail	Cairns
The Backyard	Food and beverage	Cairns
Pool Bar	Food and beverage	Cairns

2.2.4 As of current, we have a headcount of approximately 652 staff. Our full-time staff make-up about 49% of our workforce and the rest are part-time and casual-workers.

2.3 Our Supply Chains

2.3.1 Our supply chain is very large and complex and we have a wide range of suppliers who are located in Australia and overseas.

2.3.2 Before becoming a supplier for Shangri-La Australia, a business needs to read and agree to be bound by our Global Supplier Code of Conduct before we can enter the supplier's details into our portal for registration and qualification.

2.3.3 We also note that a number of our suppliers are themselves reporting entities under the Modern Slavery Act, including Challenger Services Group, one of our cleaning suppliers in Sydney.

2.3.4 We have mapped out our supply chains at a high level as set out in the following table:

No.	Product / Service category	Key themes
<i>Key direct suppliers used in relation to core product and service offerings</i>		
	Food	<ul style="list-style-type: none"> As a business that operates in the luxury hotel and hospitality space, Shangri-La Australia procures a wide range of products and services such as food and beverage products, cleaning services, linen and bedding, labour supply, computer hardware and equipment maintenance and repair.
	Beverage	
	Bedding / linen	

No.	Product / Service category	Key themes
	Cleaning services Labour supply other than cleaning (security, massage services, restaurant workforce).	<ul style="list-style-type: none"> ▪ Our cleaning services includes: <ul style="list-style-type: none"> ○ laundry services; ○ house-keeping services – some of these are done in-house and others are supplied by third-parties; ○ general cleaning of public spaces – these services are supplied by a third party. We contract with a different supplier for night cleaning of public spaces; ○ dish cleaning – these services are supplied by a third party.
	Televisions	
	Guest Supplies	
	Computer hardware	
	Equipment repair/ maintenance	<ul style="list-style-type: none"> ▪ Each of our cleaning suppliers are contracted with for no more than 3 years at a time.
	Laundry services	<ul style="list-style-type: none"> ▪ These supplied products and services support our key offerings to our guests and visitors (see section 2.2 above).
	Furniture	<ul style="list-style-type: none"> ▪ Some of our suppliers are located overseas, including in China, South East Asia, Europe, and the US.
	Water	

Indirect Suppliers

Office Supplies	<ul style="list-style-type: none"> ▪ To support our key product and service offerings, Shangri-La Australia engages a range of other suppliers who supply goods or services that are not integrated or used in our luxury hotel and hospitality operations.
IT Services/ support	
Professional services (i.e. Marketing, Legal)	<ul style="list-style-type: none"> ▪ These are suppliers from whom we purchase goods and services relating to, for example, office supplies, professional services and more.

3. Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.

- 3.1 In this section we identify the 'risks of modern slavery practices', meaning the potential for Shangri-La Australia to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.
- 3.2 In this context, 'risk' means to people, rather than the risks to Shangri-La Australia (such as reputational or financial damage).

3.3 Although Shangri-La Australia together with the broader Shangri-La Group take business ethics very seriously, we understand that we are in the first few years of our formal modern slavery journey under the Modern Slavery Act.

3.4 Our priorities

3.4.1 Based on the high level risk mapping exercise we undertook in FY23 (provided at 3.5 below), we intend to take a prioritised risk based approach as recommended by the Commonwealth Guidance.

3.4.2 In the next three reporting periods we will be focussing our efforts on the following key areas which we have identified as having higher risks and where we have the most leverage:

- key direct suppliers who provide higher risk labour services including cleaning services (e.g. housekeeping, laundry, dish cleaning), security services, massage services and restaurant services (e.g. waiters, cooks, etc); and
- assessing and mapping our industry and sector risks, to better understand the risks in our operations and supply chains.

3.5 High level risk mapping exercise of our suppliers

3.5.1 In accordance with the Commonwealth Guidance and known modern slavery indicators, in FY23 we undertook a high level risk mapping exercise of our operations and supply chains which is set out in the table below.

3.5.2 We continue to monitor our risk environment and take steps to assess and address, and to mitigate identified risks through a variety of global and local policies and procedures including: audits, pre-qualification screenings of suppliers and staff training and development. More information on the actions we take to assess and address these risks is set out at section 4 below.

Category of modern slavery risk indicators	Explanation	Risk assessment
Sector and industry risks	We acknowledge that the hospitality and hotel industry has been identified by a number of civil society groups as a higher risk industry.	<p>Shangri-La Australia acknowledges that we operate in a higher risk industry being the hospitality and hotel sector.</p> <p>We use several suppliers in respect of food and beverage products, cleaning services and maintenance services. We have processes in place to monitor that workers contracted at our hotels are allowed to work in Australia and are treated in accordance with relevant laws. One example is an audit of our contractors as described at 4.3 below.</p> <p>We aim to mitigate this risk through a variety of Global and local policies and procedures including (but not limited to) our</p>

		<p>Global Supplier Code of Conduct (which is signed by all suppliers), contractual obligations to abide by relevant laws/ regulations and an audit of our contractors, as described in section 4.3 below.</p>
<p>Product and service risks</p>	<p>Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.</p> <p>Labour exploitation in the cleaning industry is well-documented, and cleaning services have been identified by the Government as a key risk area for modern slavery in Australia.</p> <p>Similarly, other labour supply workforces such as security, massage and restaurant labourers are at higher risk of forced labour and exploitation. We consider that these workforces are inherently higher risk due to their temporary, seasonal and lower-skilled characteristics.</p> <p>Textiles are also recognised as a high risk product.</p>	<p>We have identified labour supply services as higher risk products and services.</p> <p>In particular, in line with Commonwealth Guidance, we consider that cleaning services are of particular high risk. We use a variety of cleaning services within our supply chains and operations, which include:</p> <ul style="list-style-type: none"> • laundry services; • house-keeping services – some of these are done in-house and others are supplied by third-parties; • general cleaning of public spaces – these services are supplied by a third party. We contract with a different supplier for night cleaning of public spaces; • dish cleaning – these services are supplied by a third party. <p>Cleaning and restaurant workers are vulnerable to modern slavery in the hospitality sector, especially as they are recognised as a low-skilled and low-paid workforce. This is also true of the security and massage workforce. We have processes in place (as described above) to monitor that contractors working on our premises are allowed to work in Australia and are treated in accordance with relevant laws. Along with our global and local policies and procedures, we have taken steps to mitigate these risks by undertaking an audit of our contractors as described at 4.3 below.</p>

		<p>Further, our linen (e.g. napkins, towels) and bedding are sourced at a Group level, however, our Procurement Policy and other pre-qualification and due diligence processes are followed to mitigate risks and to ensure that the supplier complies with all laws, regulations and our policies, and is the best option for the Group.</p> <p>The Shangri-La Group has a number of policies and procedures in place (as discussed at 4.2 below) designed to assess and address the risks of modern slavery. We have also discussed geographic risks related to this below.</p>
<p>Geographic risks</p>	<p>Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio economic factors like poverty.</p> <p>The World Bank's Worldwide Governance Indicators are a useful tool which measure the quality of six key dimensions of governance in over 200 countries and can help organisations with their commercial risk assessments. These indicators include: Voice and Accountability; Political Stability and Absence of Violence/Terrorism; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption.</p> <p>The Global Slavery Index is another useful tool to identify the prevalence of modern slavery and human trafficking in a particular country, and to assess the adequacy of a government's response to modern slavery and human trafficking risk.</p> <p>We considered the 2023 Global Slavery Index to confirm that Shangri-La does not directly engage with any suppliers in the countries identified in the 2023 Global Slavery Index as taking the least action in respect of modern slavery.</p>	<p>Shangri-La Australia does not directly engage with any suppliers in the countries identified in the 2023 Global Slavery Index as taking the least action in respect of modern slavery.</p> <p>Notwithstanding this, in order to mitigate any geographic risks in our supply chains, our Group Procurement Policy and other pre-qualification and due diligence processes are followed to ensure that suppliers comply with all relevant laws, regulations and our policies, and are the best option for the Group.</p> <p>Further, we also use the Worldwide Governance Indicators as a tool to guide our identification and assessment of geographic risks in our supply chains.</p>
<p>Entity risks</p>	<p>Some businesses or other entities may have a higher risk because of poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<p>At this stage, Shangri-La Australia has not identified any specific entity risks during this reporting period. However, we intend to do more work in future reporting</p>

		periods to understand potential entity risks.
Operational risks	Operational risks are those modern slavery risks that form part of our day-to-day provision of hotel services. These include the management of our employees (including casual staff), temporary workers and contractors (including managing safe working conditions for our workers), our procurement of marketing and legal services and also supply chains that contribute to our operations, such as cleaning services/ housekeeping.	<p>We acknowledge that there are operational risks in our day-to-day provision of hotel services, including the management of our direct workers. In particular we understand that lower-skilled and migrant workers, especially casual staff, may be less aware of their workplace rights.</p> <p>For more information regarding the specific steps we are taking to assess, address and mitigate these risks see Section 4.3.</p>

4. Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

4.1 Actions taken in the reporting period

Set out below in this section is an overview of the steps we have taken during this reporting period to assess and address the risks in our operations and supply chains.

4.2 Global Policies and Procedures

Shangri-La Australia is part of the Shangri-La Group which has a number of policies and procedures in place designed to assess and address the risks of modern slavery.

Global Policy/ Procedure	Explanation
Global Supplier Code of Conduct	Our Global Supplier Code of Conduct requires our suppliers, their employees, subsidiaries, affiliates and subcontractors to uphold the Shangri-La Group's core values and to adhere to ethically, socially and environmentally responsible practices when doing business with the Shangri-La Group. The Global Supplier Code of Conduct requires suppliers to comply with all laws and explicitly prohibits any form of slavery, forced labour and human trafficking or any contribution to such practices.
Global Code of Conduct and Ethics for Employees and other policies	We operate under a Code of Conduct and Ethics that requires all of the Shangri-La Group's affairs to be conducted in full compliance with the law. Employees who commence work with the Shangri-La Group are inducted on the articles of the Code of Conduct and Ethics and sign a copy at induction. Regular refresher training is also undertaken. This Code of Conduct and Ethics is supplemented with policies and procedures regarding workplace health and safety, equal opportunity and respect at work, anti-harassment and bullying and others.

Human Rights Policy

In 2023, the Shangri-La Group adopted a new Human Rights Policy that requires the Shangri-La Group to conduct its business in an honest and ethical manner, which respects human rights and the dignity and wellbeing of individuals. The Human Rights Policy specifically prohibits discrimination and harassment, and the use of child labour in its business operations and supply chains. It also provides that the Shangri-La Group is committed to observing the highest standards of human rights and does not tolerate any form of slavery and human trafficking within its operations or supply chains. The use of any form of forced labour, including trafficked, coerced, bonded, indentured or child labour is strictly prohibited by the Human Rights Policy. The use of any form of forced labour, including trafficked, coerced, bonded, indentured or child labour is strictly prohibited by the Human Rights Policy.

Responsible Sourcing Policy

In 2023, the Shangri-La Group adopted a new Responsible Sourcing Policy which provides that the Shangri-La Group is committed to conducting business in a responsible and sustainable manner, recognising the importance of responsible sourcing in achieving this goal. The Responsible Sourcing Policy provides that the Shangri-La Group strives to source products, materials and services that are produced in a socially and environmentally responsible manner throughout its supply chain. As a responsible organisation with global outreach, we aim to deliver increased reliability, quality and productivity throughout our supply chain. The Responsible Sourcing Policy enshrines our commitment to ethical conduct, human rights, prohibiting child and forced labour in our operations and supply chains, environmental responsibility, diligence and recording keeping, and responsible and continuous improvement.

Responsible Sourcing Programme

To supplement our Responsible Sourcing Policy, we have developed a comprehensive Responsible Sourcing Programme that promotes transparency, sustainability, and ethical conduct throughout our supply chain. The programme provides us with a better understanding of supplier-related risks and ensures we are notified promptly as risks arise, enabling us to take appropriate, proactive action. We are able to identify and mitigate potential risks efficiently and safeguard against issues such as unethical practices, environmental damage, and human rights violations. Our Responsible Sourcing Programme encompasses the following six components:

- Supplier Code of Conduct;
- Risk assessment;
- Risk monitoring;
- Risk mitigation and remediation;
- Supplier capacity building; and
- Risk analysis and reporting.

For more information on our Responsible Sourcing Program please see our [2023 Sustainability Report](#) (pgs. 49 – 52).

In accordance with the Shangri-La Group’s procurement processes, whether suppliers are sourced locally or abroad, all new suppliers go through a supplier pre-qualification process. In this process, our business partners are required to register themselves on Shangri-La’s shared procurement portal by providing certain details of the business (entity name, ABN, email address, etc.) and to accept the Global Supplier Code of Conduct. Once registered, the business then needs to undertake the ‘qualification’ step, by providing details of its business registration and its financial details to facilitate payment of fees.

Purchasing processes

As part of this process, pre-qualification screenings are conducted to determine whether the potential suppliers meets the Group’s requirements. The relevant team reviews and evaluates information regarding potential suppliers, including their company ownership and background, products and/or services, financial stability, licences, certificates, quality and safety standards, supply coverage, environmental and social responsibility, and other relevant information.

All Heads of Departments are trained on compliance with the procurement process.

Whistleblowing and Whistle-blower Protection Policy

A Whistleblowing and Whistle-blower Protection Policy is in place at the Group level to encourage employees, workers and suppliers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately. This allows for a grievance reporting channel for employees and suppliers to report violations of Global policies and procedures.

Training and Development

The Shangri-La Group currently provides training on topics including culture, the Code of Conduct and Ethics, and anti-bribery & corruption to equip the group’s employees with the knowledge and training to mitigate associated risks. In 2024, it will launch new learning materials, via Shangri-La Academy, on topics covering human rights, modern slavery, work health & safety, and procurement.

4.3 Local Policies and Procedures

During the FY23 reporting period we also had a number of local procedures in place to assess and address modern slavery risks. However, we are looking to expand on these in our future reporting years:

Local Policy/ Procedure	Explanation
Labour and Monitoring Systems	Shangri-La Australia uses labour monitoring and payroll systems to check eligibility of employees in Australia before they are hired. We also ensure the right to work at time of hiring and observe the

provisions of the *Workplace Relations Act 1996 (Cth)* and *Fair Work Act 2009 (Cth)* regarding minimum wage requirements for which we fully comply. Shangri-La Sydney also undertook two audits of its compliance with the applicable Award and the National Employment Standards under the *Fair Work Act 2009 (Cth)*.

Contractor audit

In FY22 we began an audit of our contractors, which required our contractors to provide us with:

- a statement of coverage of a valid Workers Compensation policy which includes the policy number, WIC # Industry coverage, number of workers covered and wage estimates for the year;
- a copy of the relevant Industrial instrument or Award that supports the engagement of employees, including pay rates and conditions;
- a sample contract of employment with the name redacted for a full-time, part-time, and casual employee;
- workplace safety list of mandatory training;
- a dispute resolution policy and process to resolve the issue; and
- compliance evidence of training on bullying, harassment, and sexual harassment.

Establishment of our Modern Slavery Working Group

During FY23, Shangri-La Australia also established a Modern Slavery Working Group. Our multi-disciplinary Modern Slavery Working Group has been established to meet on a regular basis to assign roles and responsibilities, delegate tasks, set milestones and track our progress in line with our anti-modern slavery compliance program, and to ensure we are complying with the requirements of the Modern Slavery Act and with regard to Commonwealth Guidance.

Our Modern Slavery Working Group has worked with modern slavery experts in Australia to help develop and refine our approach to assessing, addressing and mitigating risks of modern slavery.

In FY23, Shangri-La conducted training for its key personnel, including the Modern Slavery Working Group. The attendees for Shangri-La covered finance, HR, general management and marketing.

Modern Slavery Training for Key Staff

These key roles were targeted as they are the roles within Shangri-La which would have exposure and responsibility in identifying and escalating modern slavery risks and incidents. The training covered the following:

- an overview on the nature of modern slavery risks and the importance for Shangri-La;
- the current status of modern slavery laws in Australia and an overview of the specific legal requirements;
- case studies for discussion and analysis; and

- what steps Shangri-La plans to take over the coming reporting periods in relation to its anti-modern slavery compliance program.

We are aware that the Modern Slavery Act is currently under review and Australian Government has recently published its statutory review of the Modern Slavery Act.

Monitoring changes in the Australian modern slavery regulatory landscape

We considered the Modern Slavery Review and the recommendations in the review report, which continue to help Shangri-La inform its anti-modern slavery program. We will continue to monitor the progress of the review and any recommendations that may be implemented into the Modern Slavery Act accordingly.

We also considered the 2023 Global Slavery Index to confirm that Shangri-La does not directly engage with any suppliers in the countries identified in the 2023 Global Slavery Index as taking the least action in respect of modern slavery.

General Training and Development

Our hotels in Australia locally conduct training on modern slavery and human rights as part of our induction on the Global Code of Conduct and Ethics for Employees.

This is to equip employees with the knowledge and training that allows us to operate in an ethical and transparent manner.

4.4 Our future modern slavery roadmap

- 4.4.1 In order to prepare this Statement, we also conducted a detailed gap analysis of the steps we are currently taking and what measures and controls we can aim to implement to improve our ability to assess and address modern slavery risks in our operations and supply chains.
- 4.4.2 Section 7, sets out our future modern slavery compliance roadmap together with key deliverables we intend to implement. These steps have been informed by the Commonwealth Guidance together with our consideration of emerging market practice in Australia.

5. Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions

Shangri-La Australia intends to continue to use key performance indicators (KPIs) to measure how effective we have been in identifying and mitigating modern slavery risks in our operations and supply chain. Based on these KPIs, we will continually assess and improve our modern slavery compliance framework. Some of these KPIs include the following for FY23 while future KPIs will be driven by our modern slavery roadmap (see 'looking ahead') in Section 7.1:

No.	Key objective	Key performance indicator
1.	Establish a Modern Slavery Working group	Whether a Modern Slavery Working group is established in FY23 – as provided above, we have established a Modern Slavery Working Group.

2.	Implement and approve an Anti-Modern Slavery Policy	Whether an Anti-Modern Slavery Policy is drafted and presented to the board in FY 23 – this has been considered and significantly progressed by the Modern Slavery Working Group during FY23, and we are on track to approve this in our next reporting period.
		We aim to provide an update on this in our next reporting period.
3.	Prompt remediation of critical issues or incidents which are recorded through our current reporting processes	Recording the number of promptly resolved modern slavery or ethics issues that have been raised.
		We confirm we have not identified any specific instance of modern slavery during the reporting impacting Shangri-La during FY23.
4.	Ongoing training and education, including educating staff on Shangri-La's Anti-Modern Slavery Policy	Whether modern slavery training and education for staff has occurred during the next reporting period and how many staff members completed the training.

6. Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls (a joint statement must also describe consultation with the entity giving the statement)

6.1 As set out in section 2 above, Shangri-La Australia is the only legal reporting entity in Australia. As Shangri-La Australia is the parent company of, and operates, Shangri-La Sydney and Shangri-La The Marina, Cairns, key stakeholders from each hotel, including human resources, finance and general management have been involved in the development and review of this Statement prior to Board approval.

7. Criterion 7: Provide any other relevant information

7.1 Looking ahead

7.1.1 Shangri-La Australia is looking to formalise our priorities in relation to modern slavery for the coming reporting periods. We have created a strategic roadmap to address our modern slavery risks and set this out below:

7.1.2 In the coming reporting periods we intend on implementing the following projects.

(a) **An Anti-Modern Slavery Policy** – this will help Shangri-La Australia monitor high risk suppliers, mitigate risks and set out our expectation regarding modern slavery risks and reporting on modern slavery incidents. As noted above, we have already begun considering and working towards this policy and aim to provide an update on this in our next reporting period.

(b) **Educate staff on the Anti-Modern Slavery Policy** – we appreciate staff need to know the Policy exists and how to escalate and deal with issues.

- (c) **Continuing a high level risk assessment of our operations and supply chains** - as per the Commonwealth Guidance this will identify our most high-risk suppliers.
- (d) **Continued modern slavery training for staff** – this will help staff better identify and understand modern slavery risks and incidents and build organisational awareness.
- (e) **Supplier pre-screening questionnaire for modern slavery** – we intend to review our current Supplier verification process and consider the addition of the supplier pre-screening questions targeted at identifying, assessing and addressing modern slavery risks at this stage of the procurement process.

7.2 We consider that these steps in our modern slavery compliance roadmap will put **Shangri-La Australia** in a good position to identify and mitigate modern slavery risks in our business operations and supply chains and build on the global measures the Shangri-La Group already has in place.

7.3 These projects set out in the ‘looking ahead’ section are of crucial importance to us. We understand the role we have to play in combatting modern slavery and look forward to reporting on the steps we are taking and progress made in our next Statement.

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Shangri-La Investments (Australia) Pty Limited (ABN 15 146 016 033) as defined by the *Modern Slavery Act 2018* (Cth) (“the Act”) on 17/06/2024.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* Shangri-La Investments (Australia) Pty Limited (ABN 15 146 016 033) as defined by the Act.

Michael Cottan - Director
18 June 2024



Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	4
b) Describe the reporting entity’s structure, operations and supply chains.	4-6
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	6-10
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	10-14
e) Describe how the reporting entity assesses the effectiveness of these actions.	14-15
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	15
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	15-16