

The Flybuys logo is displayed in a bold, blue, sans-serif font. The background of the entire slide features a repeating pattern of large, light blue, stylized 'U' or 'n' shapes.

Flybuys

Flybuys Modern Slavery Statement

Financial Year 2025

Acknowledgement of Country

Flybuys respectfully acknowledges the Wurundjeri Woi-wurrung and Bunurong / Boon Wurrung peoples of the Kulin Nation as the Traditional Custodians of the land on which we work and live, and pays respect to their Elders past and present. Flybuys extends that respect to all Aboriginal and Torres Strait Islander peoples and recognises their rich cultures, and their continuing connection to land and waters. All references to First Nations peoples in this report are intended to include Aboriginal and/or Torres Strait Islander peoples.



Contents

| | | | |
|--|----|---|----|
| Acknowledgement of Country | 02 | 3.0 Risks | 15 |
| From the CEO of Flybuys | 04 | 3.1 Our operations | 16 |
| 1.0 Snapshot | 05 | 3.2 Our supply chain | 18 |
| 1.1 About this Statement | 06 | 4.0 Actions | 22 |
| 1.2 Our commitment | 06 | 4.1 Supplier risk assessment | 23 |
| 1.3 Our FY2024 approach | 07 | 4.2 Ethical sourcing | 26 |
| 2.0 Structure, operations and supply chain | 09 | 4.3 Governance controls and internal working groups | 27 |
| 2.1 About Flybuys | 10 | 4.4 Recruitment and training of team members | 27 |
| 2.2 How we operate | 10 | 5.0 Assessment | 28 |
| 2.3 Our supply chain | 13 | 5.1 Measures to assess effectiveness of our actions | 29 |
| | | 5.2 Commitments | 30 |

Loyalty Pacific Pty Ltd (Flybuys) opposes modern slavery in all forms. Flybuys is committed to the highest standards of conduct and ethical behaviour in our business activities and promoting a culture of honest and ethical behaviour, corporate compliance, and good corporate governance. This Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth). This is a single entity Statement in accordance with section 13. The reporting entity is Loyalty Pacific Pty Ltd ABN 82057931334.



From the CEO of Flybuys

At Flybuys, we are proud to be one of Australia's most trusted household brands with a 30-year history. With this legacy comes a deep responsibility not only to our members and partners but also to the wider community. We firmly believe that every person deserves to live and work with dignity, free from exploitation.

We are dedicated in our commitment to confronting the issue of modern slavery.

At Flybuys, we are determined to use our influence to drive change by embedding responsibility and transparency into everything we do, from how we work with suppliers, to how we support and educate our teams.

Over the past 12 months, we have made important progress on this journey. We have strengthened our supplier due diligence, assessed our processes, and prioritised further training for our people to ensure they are empowered to identify, understand and respond to the risks of modern slavery. These actions are not the end, but steps in an ongoing journey of learning, accountability, and continuous improvement.

Together with our suppliers, partners and team members, Flybuys will continue to take meaningful action to help eradicate modern slavery, protect vulnerable communities, and ensure human rights are respected at every level of our business.

This is not just a compliance obligation, it is a moral imperative and at Flybuys, we stand firm in our responsibility to be part of the solution.



A handwritten signature in black ink, which appears to read 'Anna Lee'.

Anna Lee
CEO, Flybuys

01 Snapshot

Statement snapshot

1.1

About this statement

This is Loyalty Pacific Pty Ltd's (Flybuys) Modern Slavery Statement for the company's financial year ending 29 June 2025 (the Reporting Period), pursuant to its obligations under section 13 of the Modern Slavery Act 2018 (Cth) (Modern Slavery Act). Flybuys is pleased to present this Modern Slavery Statement, outlining the steps we have taken in the Reporting Period to identify, assess, and address modern slavery risks within our operations and across our supply chain.

Flybuys takes a continuous improvement approach to modern slavery due diligence and this Statement also looks at Flybuys' plan for future action. This Statement also reports on the progress made against commitments Flybuys set out in its 2024 Modern Slavery Statement.

1.2

Our commitment

Flybuys continues to demonstrate its commitment to respecting human rights, which remains fundamental in combating modern slavery around the globe. We have continued to build trusted relationships with our suppliers and key stakeholders to reinforce our response and commitment to this ongoing international issue.

During the Reporting Period, no instances of modern slavery were identified in our operations or supply chain, however, we continue to be vigilant.

This Statement sets out and provides detail on how we have assessed our risk areas. During the Reporting Period, we have continued to develop and evolve our modern slavery risk measures and prevention practices across the operations and supply chain. This included extending our efforts in three critical areas (risk identification, risk assessment and actions taken).

1.3

Our FY2025 approach

The table below outlines the progress against the commitments made in our FY2024 statement.

FY2024 COMMITMENT:

HOW WE HAVE PROGRESSED:

Explore opportunities for the development of a Corporate Social Responsibility (CSR) framework, with oversight of modern slavery risks.

Flybuys commenced work to develop an enterprise CSR framework and has identified a number of principles to incorporate into this framework. This is a continuing piece of work we will take into our next reporting period.

Further expand the modern slavery working group to include additional internal stakeholders.

Flybuys expanded the working group who have responsibility to ensure that effective policies, practices, and partnerships are in place to prevent, identify, and respond to modern slavery risks. The group will promote a culture of transparency, accountability, and ethical responsibility in all operations and is accountable for the preparation of the Modern Slavery Statement.

Annual training of all team members on modern slavery and our responsibilities to comply with the Act.

Annual mandatory training has been completed by all Flybuys team members, and the module itself has been reviewed. Bespoke training sessions will be developed for key areas of the business and a further review of training materials will be undertaken.

Continued exploration of technological solutions to assist with the management of modern slavery risks. (e.g. to undertake supply chain risk analysis).

Flybuys has further investigated potential modern slavery risk tools and technology solutions during this Reporting Period. Additional analysis of the enterprise requirements to support our broader ESG compliance requirements will be completed and a recommendation made in the upcoming reporting period.

Table continues on page 8

1.3

Continued

FY2024 COMMITMENT:

HOW WE HAVE PROGRESSED:

Enhance visibility in relation to Tier 2 suppliers.

Flybuys developed an in-depth questionnaire for key suppliers, with the aim of gaining further detail and a deeper understanding of their supply chain, that is, our Tier 2 suppliers. The insights from the responses to the questionnaires will allow Flybuys to expand the mapping of our supply chain to include the location of key Tier 2 suppliers, providing increased visibility of our supply chain.

Amend procurement procedures, processes and standards, as required, to promote continuous improvement.

The Procurement team has reviewed and updated key policies and processes, including the Procurement Policy and sourcing process, to be launched in FY2026.

Define an ongoing consultation framework to use for ongoing statement preparation.

We have identified key internal stakeholders and defined a process to guide consultation for risk assessment and statement preparation in future reporting years.

Monitoring of the Australian Government review of the Modern Slavery Act.

This ongoing item will continue into the FY2026 reporting period.

02 Structure

Our structure, operations
and supply chain

2.1

About Flybuys: organisational structure and business

Established in 1994, Flybuys is Australia's favourite loyalty program, helping Australians to enjoy a wide range of rewards and benefits when they shop. Flybuys is committed to serving over 9.9 million active members (an active member is a member who has either collected or redeemed points within a 12-month period) with new and exciting ways to engage with the program.

Flybuys points can be collect and redeem points across 20+ partners including some of Australia's largest retailers including Coles, Kmart, Target, Bunnings, Officeworks and Velocity Frequent Flyer.

The legal structure of Flybuys has not changed during the Reporting Period. Flybuys is an Australian proprietary company, limited by shares, and is a joint venture of Coles and Wesfarmers, with both holding a 50 per cent stake in Flybuys. The Flybuys Board is made up of 7 Directors.

The company headquarters are in Melbourne, Victoria and there is a co-working space in Sydney, New South Wales. At the completion of the Reporting Period, Flybuys had approximately 257 team members.

Consistent with previous reporting periods, Flybuys does not have any owned or controlled entities.

2.2

How we operate

Flybuys evolved its operating structure during the Reporting Period to focus on its core loyalty program across Australia; rewarding its members for their everyday spending on their favourite brands. The Unpacked by Flybuys business was divested during the Reporting Period and Flybuys' functions and operations can now be separated into two main areas:

1. Core loyalty (including member experience and campaign services); and
2. Internal operations.



2.2.1

Core loyalty

The Flybuys loyalty program is free to join for anyone over the age of 16 and provides value for members through the collection of points from their everyday spending activities and through redeeming their points for rewards. At the end of the Reporting Period, Flybuys has grown to almost 10 million members and we are thrilled that for the third year in a row, Flybuys was awarded Canstar Blue's "Most Satisfied Customers" award for Reward Programs, as voted by our members. Flybuys has also taken out the top spot in the For Love or Money Loyalty Program Experience Index SPVX™.

Member experience is at the core of our business. Flybuys partners with 22 of Australia's largest household-names, some of which are shareholder-owned brands (including Coles Supermarkets, Bunnings Warehouse, Kmart, Officeworks, and Target), as well as other leading Australian companies, to provide members value across their shopping basket, both in-store and online. These companies themselves are reporting entities and prepare annual modern slavery statements.

Flybuys offers members the opportunity to redeem their points for rewards in a range of different ways. Flybuys works with more than 15 suppliers to provide more than 3,000 reward options. This includes the Flybuys Rewards Store, where points can be redeemed for thousands of items from numerous suppliers, in-store redemption at select retailers, redemption for a charitable donation and redemption of points for travel.

Flybuys engages with its partners to deliver offers to members through campaigns, focusing on relevance and value for the member.





2.2.2

Internal operations

The divestment of Unpacked and changes to the operating structure of the business led to a reduction in the overall number of team members in the business, however these changes had no impact on the risk assessment.

The 257 team members in the Flybuys workforce support the operations of Flybuys across several different functions. Team members are employed on a permanent or fixed-term basis; during the Reporting Period none were employed on a casual basis. Our People Experience function monitor wages, working hours and entitlements, such as overtime, to ensure we meet our legal obligations.

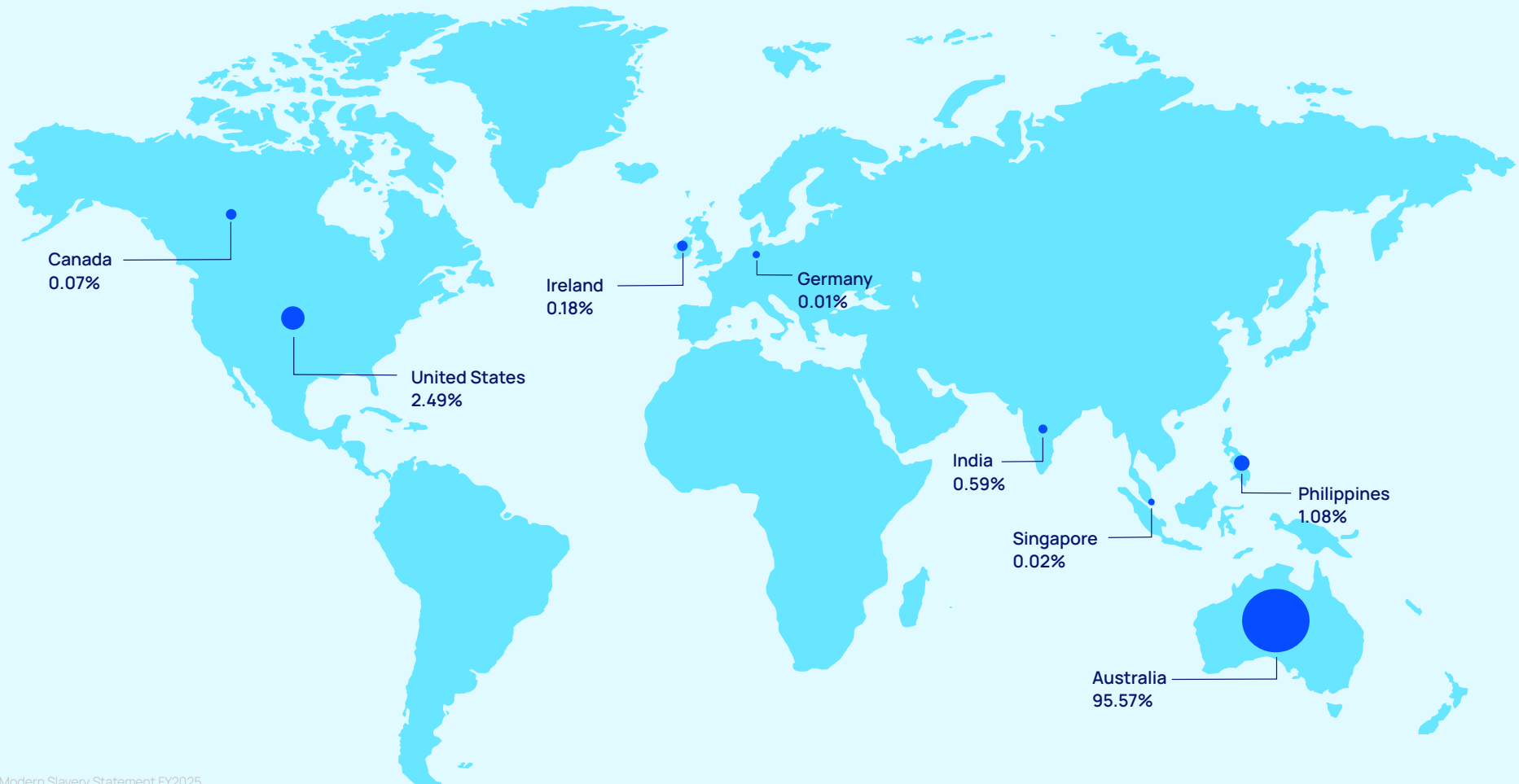
Our operations also include a small number of contractors and consultants, most of whom are based within Australia. Supporting our loyalty program are a number of suppliers detailed in our supply chain analysis, including the Flybuys Member Service Centre and suppliers of technology solutions.

Being a predominantly digital business, our requirements to engage in the physical production of goods are minimal, and often only require small-scale production. There has been no change to this requirement in this Reporting Period.

2.3

Our supply chain

During this Reporting Period, Flybuys procured goods and services from 213 Tier 1 suppliers, with 35 new suppliers being on-boarded (29 Australian based and six offshore). While more than 95 per cent of our expenditure is with Australian-based suppliers, our supply chain includes Tier 1 suppliers located in Ireland, USA, Canada, Germany, India, Singapore and the Philippines.



2.3

Continued

Flybuys categorises its supply chain into six main procurement categories:

Program Rewards

Merchandise Products, Redemption Costs, Gift Cards, Donations (91.5 per cent of supply expenditure).

Technology

Managed Services, Software, Telephony, Hardware, Labour Hire (4.7 per cent of supply expenditure).

Professional Services

Audit, Member Service Centre, Consultancy, Insurance, Legal (2.3 per cent of supply expenditure).

Marketing

Content Creation, Creative, Media Buying, Print, Sponsorship (1.1 per cent of supply expenditure).

People Experience

Events, Insurance, L&D, Merchandise, Payroll, Recruitment (0.2 per cent of supply expenditure).

Property

Rent, Facilities, Utilities, Office Supplies (0.2 per cent of supply expenditure).

The majority of new suppliers in this Reporting Period were for professional services, property, marketing services, and specialist consultancy services. As part of Flybuys supplier onboarding process, modern slavery compliance assessments were completed for the new vendors.

During this Reporting Period, Flybuys analysed the supplier base to quantify that more than 99 per cent of total supply chain expenditure is under contract. The largest areas of expenditure remain within our Rewards and Technology categories, with the highest modern slavery risk categories for the Flybuys supply chain continuing to be Labour Hire, Products (for our Rewards Store) and services provided by the Member Service Centre. We provide an overview of how we assess, mitigate, and remediate these risks in this Statement.



03 Risks

Risks of modern slavery practices in our operations and supply chains

3.1

Our operations

3.1.1

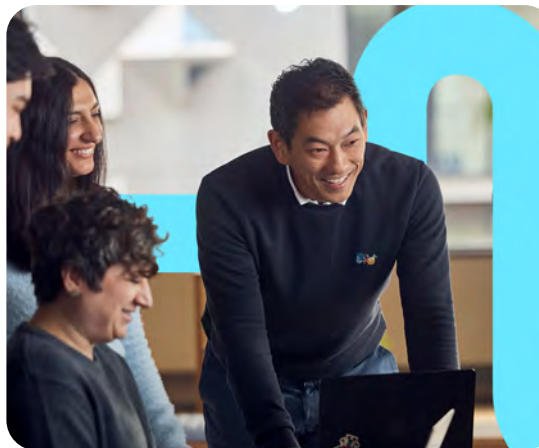
Loyalty

Collect and redeem

Program partners remain key to the operations of the loyalty program. Flybuys' program partners, due to their turnover, are required to lodge a modern slavery statement under the Act.

These partners continue to operate in higher-risk industries from a modern slavery perspective. However, our assessment of partners (using the process outlined in section 4.1 of this Statement), continues to demonstrate that despite being in high-risk industries (such as the manufacture and sale of fresh produce, clothing items, homewares and electronics), all partners take appropriate steps to manage and mitigate modern slavery risks within their operations and supply chains. These industries rely on multi-layered supply chains, often involving numerous subcontractors and labour brokers. This global complexity of supply chains often obscures transparency and accountability, allowing exploitative practices such as forced labour to persist undetected and unaddressed.

Flybuys recognises that modern slavery risks in the fresh produce sector involve debt bondage or servitude, due to the labour-intensive nature of activities such as processing and packaging, and transportation. Similarly, the clothing industry presents risks including forced and child labour, and debt bondage.



3.1.2

Internal operations

Team members and contractors

Flybuys is committed to ensuring compliance with all workplace health and safety requirements, including in remote working environments. We acknowledge our responsibility to provide, as far as reasonably practicable, a working environment that is free from risks to health and wellbeing, in compliance with applicable statutory requirements.

Flybuys' recruitment is focused within the Australian market, targeting professional roles. All recruitment processes and procedures comply with relevant regulations and standards, with team members engaged on either permanent or fixed-term contracts through standard employment agreements, which are administered centrally by the People Experience team.

As a result, our assessment of the risk of modern slavery in our internal operations for this Reporting Period remains low.

3.1.2

Continued

As a purchaser of contracted labour, Flybuys recognises the heightened risk of modern slavery within these services and takes its responsibilities to workers seriously. We require all labour hire agencies we engage to comply with relevant laws concerning labour hire licensing, workplace health and safety, right to work, fair remuneration, and human rights. These obligations are embedded within our contractual terms.

The majority of Flybuys' contracted labour is sourced through augmentation services based in Australia, with a small number of specialised roles, such as data engineering and creative content, provided by teams located in India. All labour hire suppliers were assessed during this Reporting Period using the process outlined in section 4.1, with some allocated a higher final rating due to where the contractors were located.

Labour hire based in Australia is considered lower risk for modern slavery, as organisations are legally

required to provide safe working conditions and uphold workers' rights under Australian legislation. However, Flybuys acknowledge that certain industries and roles, particularly those involving lower-skilled migrant workers or individuals on temporary visas may still present elevated risks. Given the nature of Flybuys' operations and the skilled technology roles for which labour hire is used, we have assessed the risk of modern slavery within our Australian labour hire arrangements to be low.

In contrast, Flybuys recognises that labour contracted in India is acknowledged as carrying a higher risk due to comparatively less robust legal protections relating to workplace health and safety and workers' rights as detailed in The Global Slavery Index published by Walk Free. Through undertaking the risk assessment process as outlined in section 4.1, Flybuys has assessed the risk for the India-based suppliers as low but will continually assess for any changes to this risk assessment.



3.2

Our supply chain

Flybuys remains vigilant to the potential for modern slavery risks within certain areas of our supply chain and acknowledges the possibility of being directly linked to such practices through these relationships. The highest risk areas within the Flybuys supply chain during this Reporting Period continue to be Labour Hire, Products and Merchandise (for our Rewards Store), and the Member Service Centre. We outline how we mitigate risks within these specific supply areas in section 4.1 of this Statement.

We acknowledge modern slavery risks do not stop at our Tier 1 suppliers. For this Reporting Period, we developed an in-depth questionnaire for five of our key suppliers, structured to receive greater detail and understanding of their Tier 1 suppliers, that is, our Tier 2 suppliers.

The results from the questionnaires will assist Flybuys to commence mapping of our supply chain with the inclusion of some key Tier 2 supplier locations, allowing us to conduct deeper due diligence into our supply chains. Flybuys acknowledges that the manufacturing of products or the supply of services procured by our suppliers may take place outside of the identified lower-risk countries. Flybuys will continue working with our suppliers to build a comprehensive and transparent understanding of our supply chain.

3.2.1

Rewards Store products

Many of the suppliers featured on the Rewards Store—offering products for points redemption such as electronics, home and hardware items, apparel, and general merchandise—source goods from countries identified as higher-risk for modern slavery in the 2023 Global Slavery Index. These countries include Bangladesh, China, and India. Manufactured goods from these regions carry elevated risks due to the prevalence of forced labour and limited government enforcement, which contribute to increased worker vulnerability.

As mentioned in section 2.2.1, members can also donate points to charity partners through the Rewards Store. Due to the nature of activities undertaken by charities, these organisations may present a higher risk of modern slavery. This can be attributed to factors such as reliance on seasonal labour, and the potential for underpayment of workers.

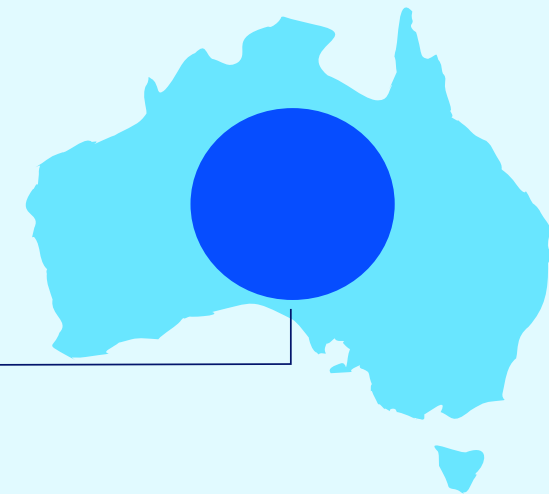
Suppliers analysed

13

Spend coverage

6.7%

Australia



3.2.2

Member service centre

Our member service centre remains outsourced to a supplier with teams based both in Australia and the Philippines. Flybuys recognises that labour outsourcing is a high-risk category for modern slavery. These risks increase where labour is outsourced to jurisdictions that have been identified as high-risk for modern slavery. Our supplier demonstrates a strong commitment to anti-slavery, as outlined in their modern slavery statement and a number of corporate policies that strive to contribute to the eradication of modern slavery and uphold the principles of fairness, integrity, and respect for human dignity.

The supplier continues to evolve its policies and has reviewed its due diligence framework to identify opportunities for investment in technology to enhance the existing supplier due diligence screening process.

Suppliers analysed

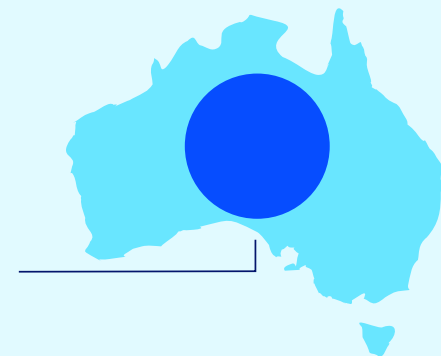
1

Spend coverage

1.1%



Philippines



Australia

3.2.3

IT software

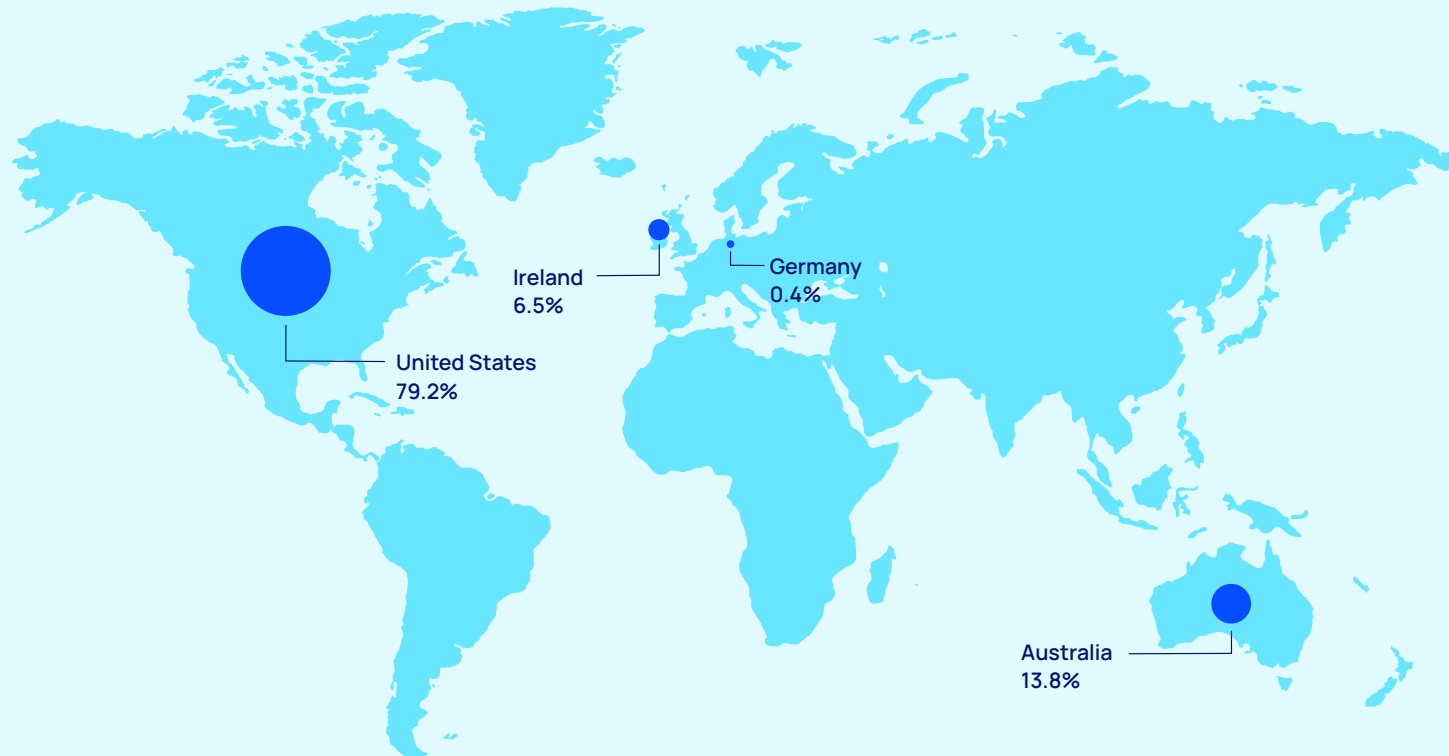
Flybuys is committed to combatting modern slavery and human trafficking across our operations and supply chain. The outsourcing of software development and related services to regions with less robust labour protections may expose workers to potential exploitation, including forced labor and unfair working conditions.

To assist in identifying these risks, Flybuys undertakes a due diligence process before engaging software suppliers. Prospective suppliers are required to complete our Modern Slavery Questionnaire, which evaluates their labour practices, compliance with anti-slavery legislation, and efforts to safeguard workers' rights. Additionally, we thoroughly review any available modern slavery statements from suppliers to assess their commitment to ethical practices. This approach, in conjunction with engaging suppliers from lower-risk countries enables Flybuys to identify and mitigate risks of modern slavery and align our supply chain with our ethical standards and legal obligations.

Suppliers analysed

35

Spend coverage

2.7%

04 Actions

Actions taken by Flybuys to assess and address the risks of modern slavery in our supply chain and operations

4.1

Supplier risk assessment

Flybuys seeks to engage with suppliers who are committed to taking meaningful action to prevent, mitigate, address, or remediate modern slavery-related harm. Visibility and control across our supply chain enhances oversight, improves risk awareness, and reduces complexity.

This approach supports more efficient resource allocation and enables faster, more effective responses to emerging issues. Flybuys' process of assessing new and existing suppliers is monitored and reviewed to ensure it supports the identification, prevention and mitigation of modern slavery risks and accounts for how the risks are addressed. Flybuys will update this process as and when required.

New Suppliers:

Our new supplier assessment process includes the following steps:

1. **Modern Slavery Questionnaire completion:** All new suppliers are required to complete this questionnaire as part of our pre-contract sourcing process.
2. **Assessment of questionnaire:** The Procurement Team will complete an assessment of suppliers' response using the Assessment Questionnaire Guidance document to support the review. Inherent risks of a potential supplier, including product/ service, country of origin, operating location, and internal policies and procedures are assessed.
3. **Follow-up consultation (if required):** If gaps are found in the completion of the questionnaire process, or red flags are identified, we work with the potential supplier to receive further information and clarify any concerns before a final decision is made, to determine whether we are satisfied to proceed with a supply contract.

Existing Suppliers:

Our assessment of modern slavery risks in our supply chain is completed in four stages over a 12-month period:

1. **Supplier mapping:** We map our suppliers and operational partners.
2. **Risk identification:** We identify modern slavery risks through proactive research and detailed supply chain analytics.
3. **Assessment:** We provide questionnaires to our existing suppliers to assess and identify any new risks within our supply chain.
4. **Prioritisation and remediation:** We prioritise our actions based on where modern slavery risks may be identified and the level of risk posed.



4.1.1

Supplier mapping

Flybuys recognises the importance of continually expanding our knowledge of the supply chain to effectively identify areas where modern slavery risks may emerge. During this Reporting Period, we have again undertaken detailed risk mapping of our supply chain using our risk model. This mapping considers key areas including spend, location, and categories and subcategories of goods and services. Once this risk mapping has been completed, a score is attributed to each supplier based on the ranking of the key areas.

4.1.2

Risk identification

Flybuys takes a risk-based approach to managing modern slavery risks within our supply chain. For this Reporting Period, we continued using the risk identification methodology to identify and gather data on relevant risk indicators. An initial risk rating is allocated to assessed suppliers based on the service/product provided, the supplier's industry, service/product country of origin and the volume of expenditure with that supplier.

After the completion of the initial assessment, two suppliers were identified as 'High Risk', and 18 suppliers as 'Medium Risk'. The two 'High Risk' suppliers provide either professional services that are from a higher-risk offshore location in relation to modern slavery instances, or have supply chains that rely on manufactured goods procured from higher-risk, offshore locations. 'Medium Risk' suppliers also include supply chains that rely on manufactured goods procured from higher-risk, offshore locations, or provide labour hire services, identified as a higher-risk category.

4.1.2

Assessment

During the Reporting Period, suppliers that make up 99 per cent of our supply chain expenditure were asked to complete a questionnaire on their modern slavery processes and practices. The questionnaire is structured to assess if suppliers have identified any risks since the last assessment period, if it has taken measures to map and protect against modern slavery in its operations and supply chain, whether it has continued or commenced reporting under the Act, and if there are any new key activities introduced during FY2025 to mitigate the risk of modern slavery within its supply chains and operations.

The final assessment criteria includes factors such as the supplier's initial risk rating, questionnaire response, and if the supplier was a reporting entity under the Modern Slavery Act.

For those suppliers that did not respond to the questions, or where a public modern slavery statement was not available to assess their modern slavery risks, continued efforts will be made to undertake due diligence and consultation of those suppliers that we will continue to engage with.

4.1.3

Prioritisation

At the conclusion of the assessment process, there were three suppliers that remained categorised as 'Medium Risk' of the initial cohort of two 'High Risk' and 18 'Medium Risk' suppliers. It was possible to reduce the initial risk rating because of additional information provided by the suppliers in their questionnaire responses, or through their own Modern Slavery Statement.

The remaining 'Medium Risk' rating has been applied primarily due to the nature of the goods/services offered, or insufficient information received from the supplier through its questionnaire response, or publicly available information.

These 'Medium Risk' suppliers operate in the following areas:

- Retail goods; and
- IT hardware.

We will continue to prioritise discussions with these suppliers beyond the assessment process to further understand and assess the materiality of any potential risks.

We understand that there are limitations in relying on responses to questionnaires, and at the end of the assessment period we determine what actions with the supplier, if any, need to be taken.

We target smaller companies with modern slavery risks higher in the supply chain in our supplier engagement efforts. Learnings from collaborating with our major retail partners can be shared and applied across our broader supplier base.

4.2

Ethical sourcing

At Flybuys, we are committed to sourcing our goods and services ethically and responsibly, and we expect all our partners and suppliers to meet our standards for business integrity, labour and human rights, health and safety, and the environment.

Flybuys' procurement policies and processes are designed to ensure we only partner with aligned suppliers. Our sourcing process is supported by our procurement framework, including our Request for Proposal (RFP) documentation, Procurement Policy, Delegations of Authority Policy, Purchase Request Form, Supplier Modern Slavery Questionnaire and Security Third-Party Risk Assessments. Before entering into formal agreements with any supplier, Flybuys conducts due diligence, including an assessment of potential risks related to slavery and human trafficking within the supplier's operations and supply chain. This process aims to identify indicators of modern slavery by evaluating questionnaire responses against criteria that indicate satisfactory and unsatisfactory practices. An inadequate response to one or more questions does not automatically preclude

Flybuys from working with a supplier; however, it may signal the need for further engagement or the implementation of additional risk management measures.

Where possible, we have continued to use our standard form contracts and documents, which contain appropriate modern slavery clauses. Where Flybuys agrees to contract with a supplier under their terms, we seek to include modern slavery provisions and obligations. These impose contractual commitments on our suppliers to require them to meet minimum standards related to the prevention of modern slavery and ongoing due diligence in its supply chains. It also grants Flybuys the contractual right to access relevant information regarding the supplier's modern slavery risks, as well as request information on the policies and processes the supplier employs to manage those risks. These responsibilities include maintaining appropriate systems and processes to identify, assess, and address modern slavery risks or incidents, delivering modern slavery training to team members, notifying Flybuys of any actual or suspected cases of modern slavery within their operations or supply chains and providing progress reports to Flybuys annually. During the Reporting Period, Flybuys quantified the total supplier spend under contract to be more than 99 per cent.

When Flybuys becomes aware of modern slavery issues within its supply chain, we are committed to working collaboratively with suppliers to ensure appropriate remediation for affected individuals. Flybuys will act promptly to document any identified modern slavery risks and ensure that all relevant information is securely stored, as required.

During the Reporting Period, we have investigated additional technology-based solutions to assist in the management of modern slavery risks and have completed further analysis on potential solutions. The need for a robust and data-driven cloud-based solution for assessing and managing modern slavery risks will not only provide deep visibility, regulatory alignment, and actionable insights but also improve the efficiency of our annual assessment process. As identified as part of the analysis, Flybuys must further understand the requirements in supporting not only modern slavery, but our broader ESG compliance requirements throughout the organisation, before a final recommendation for the solution is made.

4.3

Governance controls and internal working groups

During the Reporting Period, we expanded our internal working group to ensure enhanced collaboration across key functions of the business in respect of the management of modern slavery risks and the preparation of our modern slavery statement.

The working group ensures that effective policies, practices, and partnerships are in place to prevent, identify, and respond to modern slavery risks within Flybuys. Forums attended by all Flybuys team members provide the opportunity to share information in relation to modern slavery.

As discussed in section 3.1.2 above, during the Reporting Period, Flybuys remained vigilant in monitoring and assessing the risks of modern slavery within the internal operations of the organisation as illustrated by the feedback processes outlined below at 4.4. for example, team members feedback, and the Whistleblower Hotline.

We continue to ensure that our Modern Slavery Remediation Procedure remains relevant and is an important policy to ensure Flybuys takes appropriate action if a modern slavery concern is identified.

Monitoring developments in the law in respect of modern slavery is important to understand not only the legal obligations that apply to Flybuys, but where the future of modern slavery action is going. Flybuys monitors developments through engagement with industry, continual professional development training sessions and knowledge awareness tracking.

4.4

Recruitment and training of team members

Given the nature of Flybuys' operations, the organisation has assessed the risk of modern slavery from a human resources perspective to be low, as detailed in section 3.1.2. Flybuys has strong governance and controls, including people-focused policies, initiatives, and benefits to ensure we engage and support our team members appropriately.

Team members have several ways to provide feedback, including surveys which can be completed anonymously, and half-yearly check-ins with their line manager. Flybuys maintains a

Whistleblower Policy under which unethical and illegal activities associated with the company can be reported by current or former team members, officers, contractors, and associated individuals of Flybuys, via various channels, including an independently managed Whistleblower Hotline.

All team members are provided with training on the Whistleblower Policy at induction and as part of the annual mandatory learning program. Team members also complete mandatory modern slavery training each year. The training outlines what modern slavery is, the purpose of modern slavery statements, and the responsibilities of reporting entities and its team members. Flybuys is committed to the ongoing education of its team members on how to identify modern slavery risks and help guard against modern slavery in our organisation. During the Reporting Period, Flybuys aimed to have 100% completion rate for mandatory safety and compliance training for team members, tracked on a monthly basis. At the end of the Reporting Period we achieved a result of 93% completion. We regularly monitor completion rates and follow up where completion is outstanding.

05 Assessment

5.1

Measures to assess effectiveness of our actions

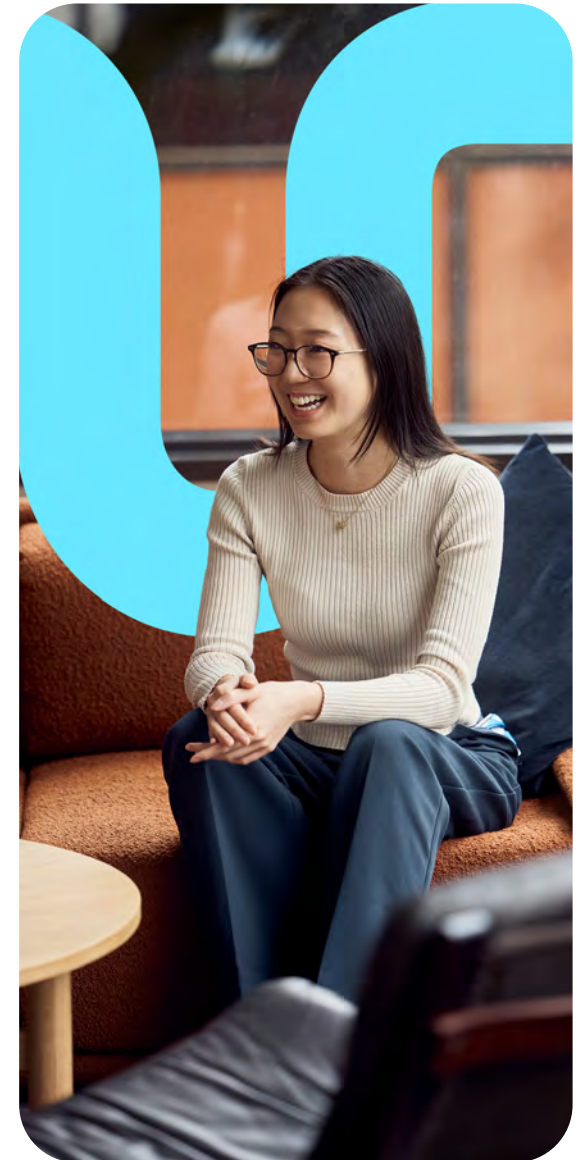
The UN Guiding Principles (UNGP) on Business and Human Rights state that businesses should track the effectiveness of their human rights responses using appropriate qualitative and quantitative indicators to determine whether policies are being implemented optimally, are effective, and drive continuous improvement. Impact measurement is a vital aspect of human rights due diligence, because it guides real change by helping businesses to distinguish between effort and effect.

To evaluate the effectiveness of our actions, we monitor progress against the commitments and initiatives outlined in our previous statement (refer to Section 1.3) and we continue to assess how effectively our efforts prevent, mitigate, and address modern slavery-related harm over time.

In Flybuys, the Procurement team leads the monitoring of the effectiveness of our modern slavery approach and its continuous improvement. The team facilitates the modern slavery risk assessment of its supply chains and maintains

the database that records the assessment outputs. This database is maintained as a dynamic document and tracked on an ongoing basis. Flybuys' Procurement works closely with the organisation's internal contract managers to assist in identifying and addressing any supply issues and risks. By using the outputs of the supplier risk assessments, the team has greater visibility of potential modern slavery risks across the supply chain and is able to manage suppliers more effectively as a result. This active supplier engagement process can sometimes lead to initial risk ratings being downgraded where risks are managed appropriately.

During the Reporting Period, Flybuys launched a risk reporting dashboard which provides on-demand analysis of our supplier risks and includes metrics to monitor modern slavery risks in our Tier 1 suppliers. Flybuys will continue to evolve the dashboard reporting to assess and benchmark our performance using relevant tools from industry and anti-slavery organisations.



5.2

As we move into FY2026 we will continue to evolve our modern slavery risk management measures across our operations and supply chain. The following tables outline items that Flybuys will be focusing on over the next 12 months.

GOVERNANCE AND CONTROLS ACTIONS:

HOW WE WILL PROGRESS:

Continued development of the enterprise CSR framework, with oversight of modern slavery risks.

To reflect UNGP best practice, the modern slavery working group will contribute to the CSR framework as it develops, to ensure modern slavery risks and initiatives are incorporated.

Development and delivery of bespoke training for contract managers to complement mandatory training for all team members.

Work with internal teams and external consultants to develop targeted modern slavery training.

SUPPLY CHAIN ACTIONS:

HOW WE WILL PROGRESS:

Continued exploration of technological solutions to assist with the management of modern slavery risks (e.g. to undertake supply chain risk analysis).

With developments in technology, including the use of AI, we will continue to review the market for solutions which add value to our existing practices.

Continue to gain insights and data across Tier 2 suppliers.

Further engagement with identified key suppliers to understand Tier 2 suppliers and commence mapping of these in our supply chain.

COMPLIANCE AND MITIGATION ACTION:

HOW WE WILL PROGRESS:

Monitoring of Government consultation and regulatory reform in relation to the Modern Slavery Act.

Through engagement with industry, accessing CPD and tracking Government action.

Flybuys makes this Statement in accordance with section 13 of the Modern Slavery Act 2018 (Cth) and constitutes Flybuys' Modern Slavery Statement for its financial year ended 29 June 2025.

This Statement was approved by the Board (as the principal governing body) of Loyalty Pacific Pty Ltd (Flybuys) on the 23rd of October 2025.

Signature:

A handwritten signature in black ink, appearing to read 'Anna Lee', with a stylized flourish at the end.

Director: **Anna Lee**

Date: **7th of November 2025**

The Flybuys logo is centered on a light blue background. It features the word "flybuys" in a bold, lowercase, sans-serif font. The letters are a vibrant blue color. The background is decorated with large, light blue, stylized vertical shapes that resemble the letter 'u' or 'n', creating a rhythmic pattern.

flybuys