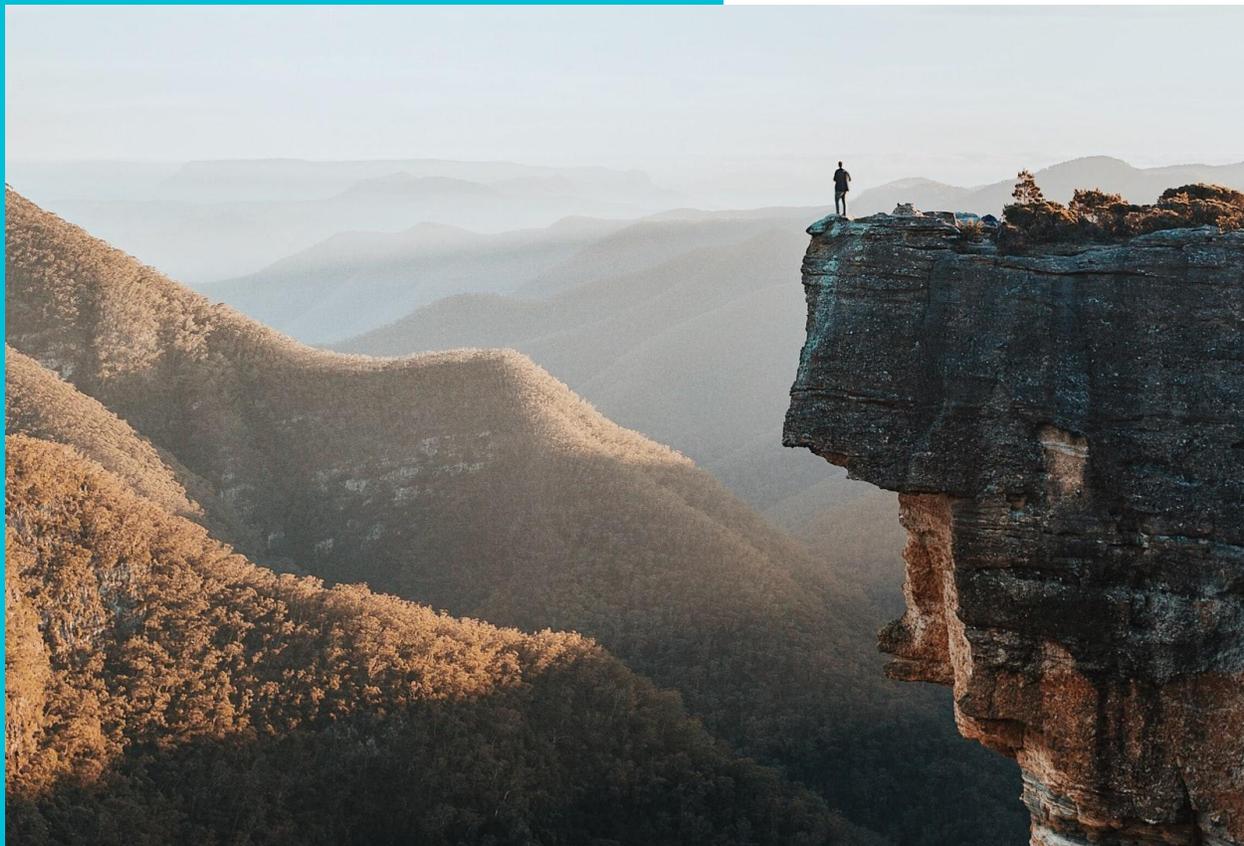




Modern Slavery Statement 2023

Financial Year ending 30 June 2023



*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 2022 to 30 June 2023 (the reporting period).

This statement 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).

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 is correct as of 30 June 2023. This statement was reviewed and approved by the TAD HoldCo Pty Ltd Board acting as a higher entity under the MSA on 20 December 2023 and is signed by the TAD HoldCo Pty Ltd Chairperson.

CHAIRPERSON'S MESSAGE

I am pleased to sign and present the first Statement for Trip A Deal.

As one of Australia's leading online travel agents, helping approximately 75,000 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.

While we are a comparatively smaller business, we have a global reach. Through our international footprint, we 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.

This Statement sets out the actions we have taken so far to understand and respond to potential modern slavery risks in our operations and supply chain. It also identifies key areas of focus going forward, including:

- Revising our policy framework and processes to more specifically address modern slavery risks;
- Developing a modern slavery roadmap to guide our ongoing modern slavery response; and
- Continuing our work to assess potential modern slavery risks across our supply chain and develop a risk-based approach to strengthen our due diligence and risk management approach.

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 providing updates in future years regarding our progress in these areas.



20 December 2023

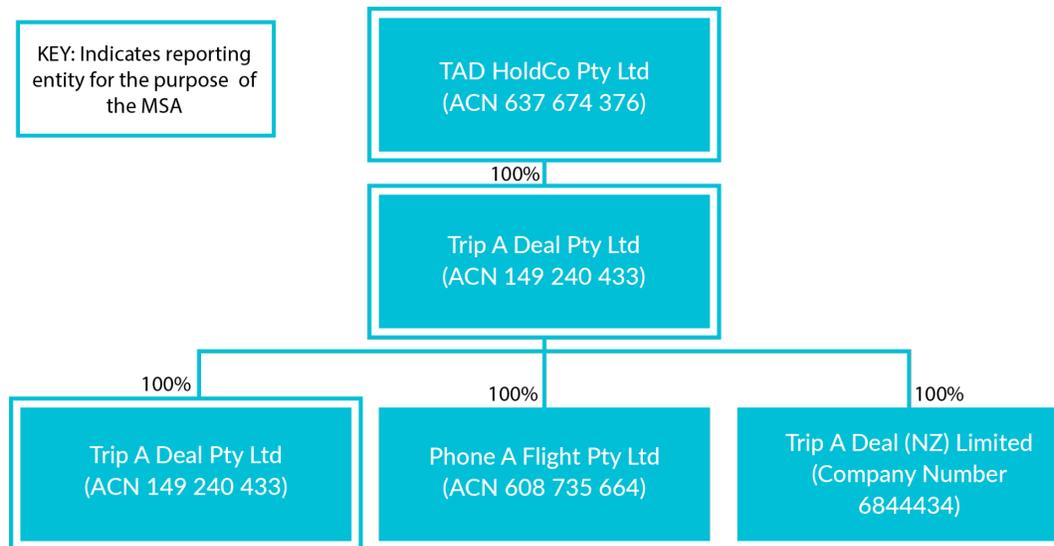
Olivia Wirth

Chairperson TAD Holdco Pty Limited

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 a wholly owned subsidiary of Trip A Deal Holdings Pty Limited, which is wholly owned by TAD HoldCo Pty Ltd. TAD HoldCo Pty Ltd is majority owned by Qantas, BGH Capital and the founders of Trip A Deal hold minority shareholdings.



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, with the majority of our customers aged over 55 years. Our reach extends to over 104 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 are provided by third parties and are not delivered by us. Our key destinations include Japan, Europe, South East Asia, India, North America, Egypt, Jordan and Turkey.

At 30 June 2023, Trip A Deal employed 156 full time equivalent 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 also 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.

Our Supply Chains

Trip A Deal procures a range of products and services through a diverse supply chain, to support our core business activity. For example, Trip A Deal spent approximately \$23.7 million on marketing, sponsorship, advertising, IT development and business overheads in FY23. While the majority of our total non-travel related procurement spend on business products and services has been 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 290 suppliers who provide services into our travel products and packages, based in 104 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 directly.

We hold contracts with approximately 90% of our travel-related suppliers, and in most instances our travel-related suppliers provide exclusive travel product and services to Trip A Deal. Our contractual agreements and our long-standing relationships with many suppliers, means that we typically engage with them directly on a regular basis which can help us to understand their operations and potential exposure to modern slavery risks.

3. 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 freedom¹. 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 geographic, sector, and product and services specific risks. We use these risk areas to help us identify and understand potential modern slavery risks in our operations and supply chains.

Geographic Risks

Our diverse global footprint means our exposure to modern slavery risks may vary by geography. We utilise a number of sources to help us understand the geographic locations relevant to our operations that may have a higher prevalence of modern slavery. These sources include the Walk Free Global Slavery Index² and a destination map produced by the Roundtable Human Rights in Tourism Destination Map³. Using this information helps us to assess at an indicative level if the travel product or services are located in a higher risk geographic location where modern slavery practices may be more prevalent.

Sector, Product and Services Risks

We understand that certain sectors (and the products and services they involve) can be associated with a higher risk of modern slavery practices. We also acknowledge that the characteristics and vulnerabilities of the travel and tourism sector may make it susceptible to such risks. 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' (UNGPs) 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.

¹See the Australian Government's official guidance about reporting under the Modern Slavery Act.

²See <https://www.walkfree.org/global-slavery-index/>

³See <https://www.humanrights-in-tourism.net/destination-risk-map> .

- *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. 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, including the COVID-19 recovery.

Modern slavery risks in our direct operations

As set out in the table below, 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.

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

Trip A Deal has been operating continuously in the tourism sector since 2011. Like many other travel (and travel associated) businesses globally, we were significantly impacted by the introduction of travel restrictions due to the COVID-19 pandemic, which also had significant impacts on global supply chains more broadly.

During the reporting period, we experienced an increase in demand for travel products, particularly for international travel packages. This increase in demand has occurred alongside significant increases in supply chain costs, which reflects ongoing labour and materials shortages. We recognise this combination of increased demand and shortage of supply places increased stress on global supply chains, which may particularly impact vulnerable workers given increased modern slavery risks.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISK

Governance and Policies

Currently, within the management structure, the Chief Operating Officer is accountable for risk management, and policies and processes, including for modern slavery risks. As our business expands and in recognition of the evolving operating environment and increasing stakeholder expectations, we plan to further enhance our governance framework to help ensure it remains fit for purpose. Over the reporting period, we commenced an internal review of our broader governance framework to more clearly define accountability for management of risk, including our response to modern slavery risk.

Trip A Deal has also implemented a policy framework to support the responsible operations of our business.

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.

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

In line with our work to strengthen our broader governance framework, one of our key focus areas for the next reporting period is to enhance our policy suite, which may include amending existing policies and developing new policies where relevant to enhance our modern slavery response.

Training and Awareness

Training and awareness raising is a key part of modern slavery risk management and we are working to develop appropriate internal modern slavery training.

During FY23, we identified an opportunity to improve the modern slavery awareness levels of our people at all levels of the company, including our Board. Going forward, we aim to develop and deliver targeted modern slavery awareness training to our people. We anticipate this training will cover issues such as how

modern slavery occurs, possible modern slavery red flags and risks for the travel and tourism sector, and how to identify and safely report potential concerns.

We also engaged with the Board about modern slavery risk management as part of the approval process for this statement and will consider further opportunities for Board level engagement in this area as our response matures.

More broadly, 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. As we develop our approach to modern slavery training, we will also consider how information about modern slavery could be included in our orientation training.

All employees 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 (which addresses modern slavery).

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. We will progress work to integrate specific modern slavery considerations into our supplier due diligence process where appropriate, which will also be reflected in our modern slavery roadmap.

During the reporting period we also commenced a review of our contracts to progressively include specific modern slavery clauses in our supplier contracts. We will continue to embed these clauses for both existing and new contracts in future reporting periods.

The modern slavery clauses require the supplier to take reasonable steps to identify, assess and address, and notify the Trip A Deal of incidents and risks of modern slavery and to take reasonable action to respond to any identified instances of modern slavery.

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 a number of 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 proactively investigate the situation, which may include seeking expert external advice and support.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

As our business expands and our modern slavery response evolves, we will continue to consider how we can assess the effectiveness of our actions.

We see an effective response to modern slavery as one where we are able to 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. Specific actions currently underway, such as the review of our governance frameworks and relevant policies will also support us to consider the effectiveness of our actions in these areas.

Another avenue we use to understand our effectiveness is engagement with relevant staff from Qantas involved in managing Qantas' modern slavery and broader human rights response. This engagement assists us to identify areas for further action and learn from Qantas' experience implementing modern slavery risk management actions.

As we implement new modern slavery risk management actions going forward, we will explore how we can build in processes to track their effectiveness, such as a mock scenario after a training session to assess understanding. We will work to include these processes in our modern slavery work plan.

Looking ahead

Over the coming reporting periods, we will seek to progress our approach to identifying, assessing and addressing our modern slavery risks through a modern slavery work plan, including by:

- Continuing to engage with shareholders and other stakeholders to further develop our understanding of, and approach to addressing, modern slavery risks;
- Building greater modern slavery awareness of our people through enhancement of our existing training program to include a focus on modern slavery;
- Reviewing relevant policies and contractual expectations for our suppliers to help ensure these policies and clauses appropriately address modern slavery;
- Considering opportunities to integrate modern slavery considerations into our supplier due diligence processes to strengthen our risk management;
- Expanding our approach to assessing the effectiveness of our actions, including by considering potential indicators we can use to monitor the effectiveness of key actions; and
- Meeting with selected suppliers to build modern slavery awareness, explain our expectations and better understand their modern slavery risk management approach, including their policies and

processes and potential exposure to modern slavery risks to better understand our modern slavery risk profile of our supply chain.

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. Two of the directors involved in approving the Statement also have responsibilities for multiple 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 and 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 the shared company secretary. Additionally, key representatives from Qantas Group were also consulted in the preparation of this Statement. Qantas holds a majority shareholding in 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.