

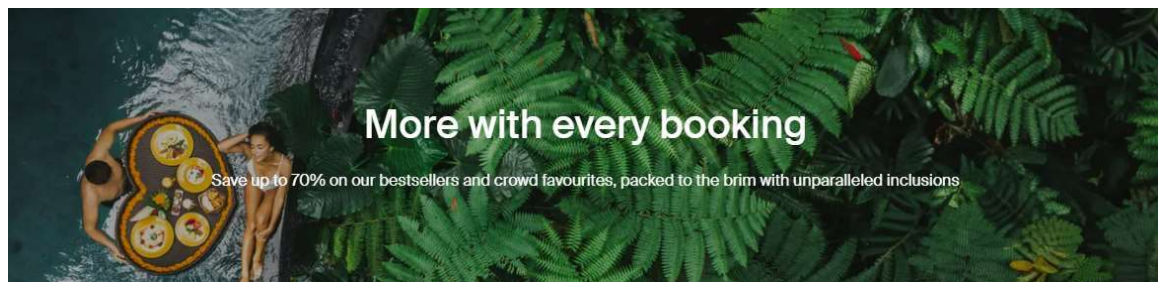
Modern slavery statement for Lux Group Limited for financial year ending 30 June 2024

1. Introduction

- (a) Slavery, servitude, forced and compulsory labour and human trafficking represent grave human rights abuses.
- (b) Lux Group Limited (ACN 601 688 966) (**Lux Group, we or our**) is committed to operating responsibly and establishing and adhering to the highest ethical standards.
- (c) This modern slavery statement (**Statement**) outlines our efforts to prevent modern slavery and human trafficking within our operations and supply chain, in compliance with the Modern Slavery Act 2018 (Cth).
- (d) This Statement relates to the reporting period ending 30 June 2024 (**Reporting Period**).
- (e) Lux Group does not tolerate any form of modern slavery in any part of its business or supply chain. We act ethically and with integrity in all our business relationships and ensure that our procurement practices are transparent, fair and responsible.
- (f) This Statement acknowledges that Lux Group's efforts to identify and address modern slavery risks are ongoing. It serves as a living document, reflecting our continuous initiatives in this area.

2. About Lux Group

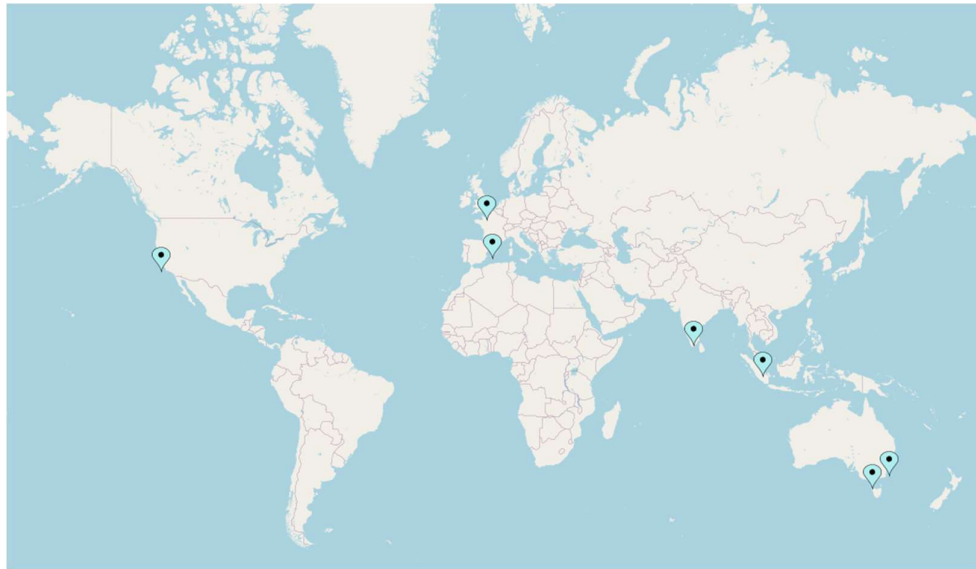
- (a) Lux Group is headquartered at Level 4, 68 Clarke Street, Southbank, Victoria, 3006.
- (b) It operates in the travel, e-commerce and technology sectors and is renowned for creating exceptional travel experiences worldwide.
- (c) Our subsidiaries include the following companies (which are the main operating entities):
 - (i) Lux Operations Pty Ltd
 - (ii) Luxury Escapes Travel Pty Ltd
 - (iii) Luxury Escapes (Singapore) Pty Ltd
 - (iv) Luxury Escapes Business Traveller Pty Ltd
 - (v) Lux Retail (Vic) No.1 Pty Ltd
- (d) We operate a diverse portfolio of leisure travel brands, each catering to specific segments within the travel market.
- (e) Our flagship brand, Luxury Escapes, stands as a beacon for luxury travel experiences, offering curated packages for travellers seeking global experiences.



- (f) Lux Group operates as an online travel agent connecting customers with discounted luxury holiday deals across the globe. The business sells, flights, hotels accommodation, travel insurance and ancillary products that all relate to travel based activities.
- (g) Whilst it has been an online travel business since its inception in 2013, it opened a bricks and mortar Luxury Escapes store in Chadstone in 2023.

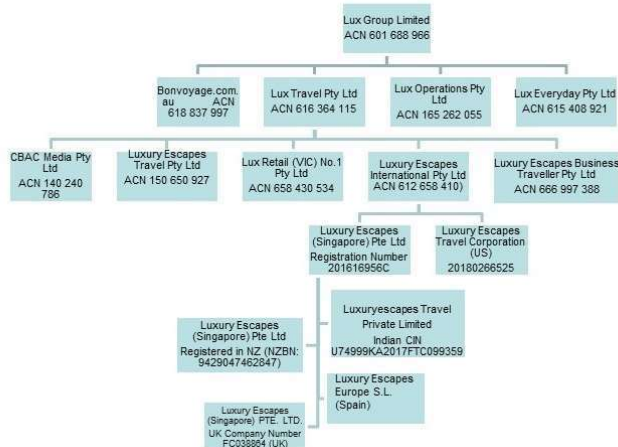
3. Our operations and structure

- (a) Lux Group operates globally with offices in Melbourne, Sydney, Barcelona, London, India and Singapore.



- (b) Our operations span across various industries including:
 - (i) technology;
 - (ii) travel services; and
 - (iii) e-commerce for travel and leisure experiences.
- (c) Our group company structure chart is as follows:

Lux Group Limited – Group Structure (30 June 2024)

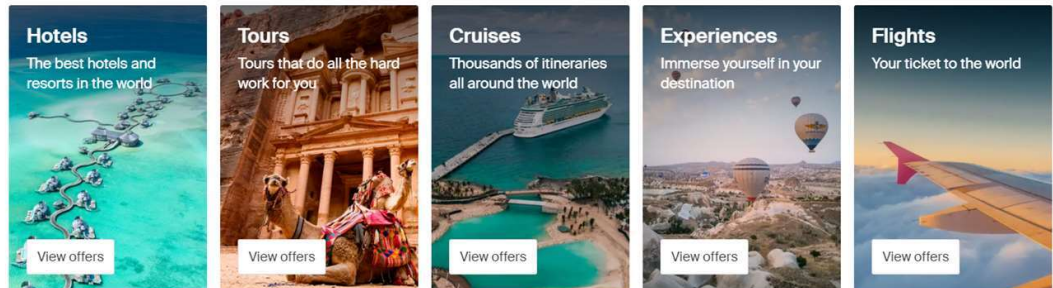


4. Supply chain structure

- (a) Lux Group employs 573 people globally and relies on a diverse network of suppliers to support and enhance the overall operations of our employment services. We recognise the inherent dignity of our staff and the people working in our supply chains and each person's equal and inalienable rights to freedom, justice and fair work conditions.
- (b) Our supply chain is sophisticated and comprises over 1,200 suppliers worldwide (several of which are multinational companies). These include:
- (i) hotels;
 - (ii) airlines;
 - (iii) online travel agencies;
 - (iv) insurance providers;
 - (v) experience providers; and
 - (vi) service and maintenance providers.

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- (c) We operate our business with a strong focus on corporate governance. We see the governance of our supply chain as a key step to managing modern slavery risk across our business operations.
- (d) We are selective in engaging suppliers to ensure modern slavery risks are minimised.
- (e) To support our governance, Lux Group has, during the Reporting Period, implemented a number of policies which assist to govern our supply chain and business operations including a Code of Conduct and Whistleblower Policy. The Whistleblower Policy encourages a culture where any officer, employee or contractor does not suffer detriment because of speaking up about potential misconduct concerns.
- (f) We are currently working through an update to these policies to ensure they continue to meet changing industry and international expectations.

5. Modern slavery risks in our supply chain

- (a) Within the operational framework of Lux Group, we acknowledge and address various modern slavery risks embedded within our supply chain:
- (i) **Geographic risks:** Our suppliers may operate in regions where modern slavery is prevalent, due to poor governance, weak rule of law and socio-economic factors like poverty. We are mindful of being vigilant to monitor these issues to ensure ethical practices.
 - (ii) **Industry risks:** The travel and hospitality sectors, integral to our operations, can be susceptible to modern slavery due to reliance on low-skilled labour. We prioritize measures to safeguard against exploitation within these sectors.
 - (iii) **Labour intensity:** Certain aspects of our supplier operations demand high labour inputs, which can heighten the risk of modern slavery. We aim to mitigate such risks and promote fair labour practices.
 - (iv) **Skills level:** Recognising the vulnerability of low-skilled workers to exploitation, we aim to prioritise initiatives aimed at safeguarding their rights and well-being within our supply chain.
 - (v) **Health and safety:** Disparities in health and safety standards among our suppliers can create opportunities for exploitation. We prioritise partnerships with suppliers committed to maintaining high standards of health and safety for our workers, including remote workers. As contemplated in our Workplace Health and Safety Policy, we remain committed to:
 - (A) building and fostering a culture in which diversity is valued; and
 - (B) providing a workplace that is safe and respectful.
 - (vi) **Labour hire practices:** We remain vigilant against exploitative hiring practices within our supply chain, ensuring that all workers are treated fairly and with dignity throughout the hiring process, including remote workers.
- (b) To bolster our commitment to ethical practices, during the Reporting Period we have integrated modern slavery considerations across our supplier agreements, striving for compliance with applicable laws. Moreover, we focus on modern slavery risks in our supply chain by conducting supplier risk assessments for our 'business traveller' segment if we are offering credit terms. We plan to implement further supplier risk assessment processes in the future across the business.

6. Future commitments

Lux Group is dedicated to improving our practices to combat modern slavery and recognises that continuous improvement is a key element of an effective response to modern slavery risks. Our future initiatives which we aim to enhance through the course of the next reporting period include:

- (a) updating supplier agreements – incorporating modern slavery clauses in supplier contracts.
- (b) comprehensive risk assessments – expanding our risk assessment framework to cover more subsidiaries and suppliers.
- (c) employee training – implementing training programs for employees to identify and address modern slavery risks.
- (d) stakeholder engagement – collaborating with stakeholders to improve industry standards and practices and methods to ensure our tools keep up to date with the ever-changing area of modern slavery.

7. Consultation with our related entities

This Statement is made pursuant to section 13(1) of Modern Slavery Act (Commonwealth) 2018. It constitutes the statement of Lux Group Limited for the year ended 30 June 2024 and was approved by the Board of Directors of Lux Group Limited.

DocuSigned by:

Adam Schwab

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Adam Joseph Schwab

Co-Founder + CEO

28 May 2024 | 3:52:37 PM AEST

Date signed