



## HBX Group

# Modern Slavery and Human Trafficking Statement for Travelcube Pacific Pty Ltd Statement for Financial Year 2026

This statement is made pursuant to s.54 of the United Kingdom Modern Slavery Act 2015 (“Modern Slavery Act”).

HBX Group is committed to ethical working practices and maintaining integrity and transparency in all dealings with employees, clients, business partners, suppliers, and authorities.

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

### Our organization

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

The Company is headquartered in Sydney (Australia) and employs 28 employees in Australia as of 30 September 2025.

### Our policies

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

- [HBX Group Code of Conduct](#). The Code of Conduct sets the framework around how HBX Group employees work together to deliver products and services globally. It gives clarity to employees and everyone HBX Group deals with about how the company does business. It sets out what HBX Group stands for.
- [Environmental, social and governance policy](#). This policy reflects HBX Group’ commitment to sustainable best practices in all aspects of the business, with a particular focus on employees, company culture, the environment and local communities.
- [Environmental policy](#). HBX Group is committed to minimizing its environmental impact across all operations, promoting responsible resource use, and supporting the transition to a low-carbon economy. This Environmental Policy guides our actions to protect ecosystems, reduce emissions, and foster sustainable practices throughout our value chain.



- [Child Protection Policy](#). This policy defines HBX Group's commitment to child protection by setting out the actions and practices taken in order to contribute to the eradication of the Commercial Sexual Exploitation of Children and Adolescents.
- [Animal Welfare Policy](#). This policy has been created to promote responsible practices among our suppliers to ensure best animal treatment practices, compliance with relevant national and international legislation and to meet clients' expectations.
- [Supplier Code of Conduct](#). This code sets out the minimum standard of ethical conduct, values and principles HBX Group expects from suppliers, contractors and agents.

### **Our Suppliers and Third parties**

HBX Group requires its Suppliers to comply with the national, supranational and international legislation and related procedures, restrictions and sanctions in relation to human rights and labour law; supporting local communities, identifying and monitoring bribery and corruption risks, identifying and monitoring negative environmental impacts; and introducing/maintaining quality assurance and Health and Safety policies in their business.

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

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

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

HBX Group recognizes the risks of modern slavery practices within its operations and supply chains. These risks may arise from complex global supply chains, including the sourcing of raw materials and the use of third-party suppliers. To mitigate these risks, HBX Group will conduct thorough due diligence and risk assessments in the future, ensuring compliance with ethical standards and legal requirements.

Additionally, HBX Group engages in regular consultations with entities it owns or controls, as well as with the entity giving this statement, to ensure a unified approach to addressing modern slavery. These consultations involve sharing best practices, aligning policies, and collaborating on initiatives to prevent and address modern slavery practices.



### **Risk Assessment and Due Diligence**

HBX Group recognizes the risks of modern slavery practices within its operations and supply chains. These risks may arise from complex global supply chains, including the sourcing of raw materials and the use of third-party suppliers. To mitigate these risks, HBX Group will conduct thorough due diligence and risk assessments in the future, ensuring compliance with ethical standards and legal requirements. Additionally, HBX Group engages in regular consultations with entities it owns or controls, as well as with the entity giving this statement, to ensure a unified approach to addressing modern slavery. These consultations involve sharing best practices, aligning policies, and collaborating on initiatives to prevent and address modern slavery practices.

### **Training**

HBX Group provides training on modern slavery, in which employees are introduced to the various forms of modern slavery, contributing factors, high-risk sectors in our industry, ways to identify signs of slavery, and on how to advocate for the ongoing fight against modern slavery.


Through our Sustainability Hub, we also develop and share communication articles with our value chain to raise awareness of human rights and modern slavery issues. These resources support broader understanding across our business partners and help reinforce responsible practices throughout our supply chain.

### **Monitoring**

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

### **Approval for this statement**

This statement was approved by the Board of Directors on 31 March 2026



Director of Travelcube Pacific Pty Ltd