



SHANGRI-LA INVESTMENTS (AUSTRALIA) PTY LIMITED
(ACN 146 016 033)

LILYVALE HOTEL PTY. LTD.
(ACN 003 643 963)

SHANGRI-LA HOTEL (CAIRNS) PTY LIMITED
(ACN 146 053 349)

**SHANGRI-LA JOINT MODERN
SLAVERY STATEMENT**

Legislation: *Modern Slavery Act 2018* (Cth)

Reporting Year: 4

Reporting Period: 1 January 2025 -31 December 2025 (FY 2025)

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1. INTRODUCTION

This joint modern slavery statement (**Joint Statement**) covers the reporting period from 1 January 2025 - 31 December 2025 (**FY25**) for all Shangri-La companies operating and carrying out business in Australia who are required to publish a modern slavery statement under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). The reporting entities covered by this Joint Statement are:

Reporting Entities			
Entity	ACN	Registered office address	Details
Shangri-La Investments (Australia) Pty Limited (Shangri-La Australia)	146 016 033	Level 38, Tower Three, International Towers Sydney, 300 Barangaroo Avenue, Sydney 2000, Australia	A leading business in the luxury hotel, accommodation and hospitality space, operating two hotels in Australia being: - Shangri-La Hotel Sydney, located at 176 Cumberland Street, The Rocks NSW 2000, Australia (Shangri-La Hotel Sydney); and - Shangri-La The Marina, Cairns, located at Pierpoint Road, Cairns QLD 4870, Australia (Shangri-La Hotel Cairns).
Lilyvale Hotel Pty. Ltd. (Lilyvale)	003 643 963	176 Cumberland St, The Rocks, NSW, 2000, Australia	A subsidiary company of Shangri-La Australia, that owns the Shangri-La Hotel Sydney.
Shangri-La Hotel (Cairns) Pty Limited (Shangri-La Cairns)	146 053 349	176 Cumberland St, The Rocks, NSW, 2000, Australia	A subsidiary company of Shangri-La Australia, that owns the Shangri-La Hotel Cairns.

In this Joint Statement, the above entities are collectively referred to as the **Australian Shangri-La Reporting Entities, we, our or us**.

The Australian Shangri-La Reporting Entities form part of the global Shangri-La group of companies, which owns and/or operates over 100 luxury hotels and resorts in over 75 destinations in Africa, Asia, Europe, the Middle East, North America and Australia, and with 42,000+ employees globally (**Shangri-La Group**).

This Joint Statement is:

- Shangri-La Australia's fourth Modern Slavery Statement;
- Lilyvale's second Modern Slavery Statement; and
- Shangri-La Cairns' first statement.

Shangri-La Australia and Lilyvale have previously submitted two joint statements.

While this Joint Statement covers the Australian Shangri-La Reporting Entities, 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.



We 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 its Global Code of Conduct and Ethics and Human Rights Policy, which underpins 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.

This Joint Statement under the Modern Slavery Act outlines the key steps we have implemented at a global and local level to identify modern slavery risks and to assess and address these risks. Key steps and progress we have undertaken in FY25 include:

- **Anti-Modern Slavery Policy:** We have an Anti-Modern Slavery Policy, which applies to all persons working for Shangri-La Australia and its subsidiaries, including Lilyvale and Shangri-La Cairns, to assist us to monitor high risk suppliers, mitigate risk and set out our expectations regards modern slavery risks and reporting on modern slavery incidents;
- **Global Training:** The Shangri-La Group has implemented a compulsory training module on modern slavery and human rights risks that is bespoke and specific to the hotel industry, which has been rolled out globally and locally;
- **Human Rights Due Diligence:** The Shangri-La Group has worked with an external human rights expert to establish a comprehensive, group-level human rights due diligence assessment to better understand the potential and actual human rights risks associated with our operations, products and services. It has interviewed and surveyed internal and external stakeholders about modern slavery risk and identified areas of improvement;
- **Risk Monitoring:** The Shangri-La Group continues to ensure its risk monitoring processes to cover international indices that include topics such as human rights. It conducted risk assessments of over 120 of its "critical" Tier 1 suppliers, which make up 30% of the Shangri-La Group's procurement spend and identified suppliers that require further monitoring to manage risks.

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 the Australian Shangri-La Reporting Entities look to build on our continuous improvement and risk-based prioritised approach in following reporting years.

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

Principal Governing Body Approval

This Joint Statement has been approved by the board of Shangri-La Investments (Australia) Pty Limited on behalf of each of Shangri-La Investments (Australia) Pty Limited, Lilyvale Hotel Pty. Ltd. and Shangri-La Hotel (Cairns) Pty Limited, as the parent company of those entities, in accordance with section 14(2)(d)(ii) of the Modern Slavery Act, on 30 June 2026.

Signature of Responsible Member

This Joint Statement is signed by Michael Cottan in his role as Director of Shangri-La Investments (Australia) Pty Limited as the responsible member of Shangri-La Investments (Australia) Pty Limited In accordance with section 14(2)(e)(ii) of the Modern Slavery Act.



Michael Cottan

Director

Shangri-La Investments (Australia) Pty Limited

Date: 30 June 2026

CRITERION 1: IDENTIFY THE REPORTING ENTITY

The Shangri-La Australia Reporting Entities identified in the Introduction make this Joint Statement in accordance with section 14 of the Modern Slavery Act. This Joint Statement is submitted and published for the FY25 Reporting Period.

Our Joint Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. As with previous statements, we have used the Commonwealth Guidance for Reporting Entities (**Commonwealth Guidance**) and the Modern Slavery Act Supplementary Guidance (**Supplementary Guidance**) to help inform and guide our approach in preparing this Joint Statement.

CRITERION 2: DESCRIBE THE REPORTING ENTITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Our Structure

Corporate structure

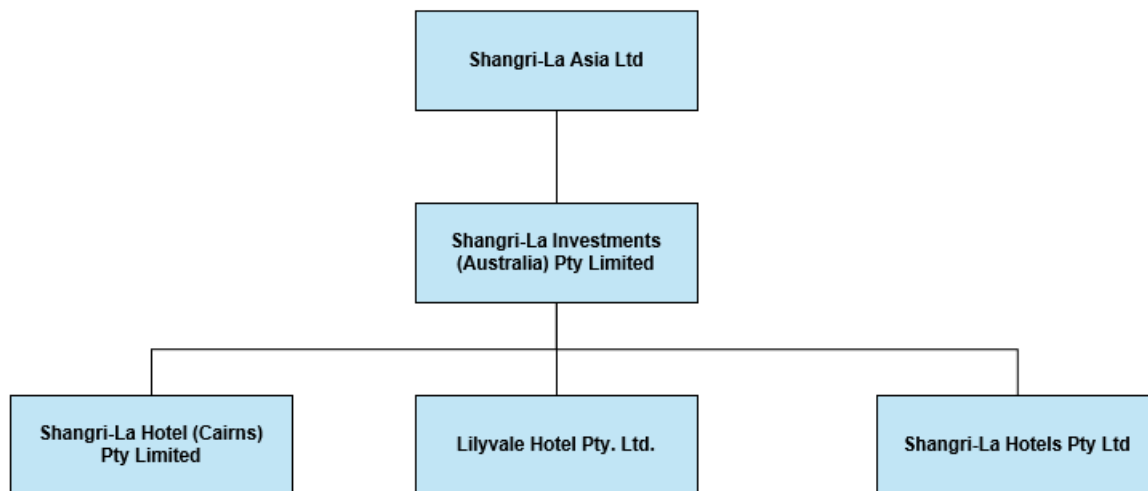
Shangri-La Australia, Lilyvale and Shangri-La Cairns are Australian proprietary companies limited by shares and are incorporated in Australia.

Shangri-La Australia is the parent company of Lilyvale and Shangri-La 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. Lilyvale and Shangri-La Cairns do not hold or control any subsidiary companies.

The parent company for Shangri-La Australia is Shangri-La Asia Ltd founded in 1971 and headquartered in Hong Kong.

Shangri-La Australia, Lilyvale and Shangri-La Cairns are 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.

Please see below corporate structure diagram.



Headcount

Across Sydney and Cairns, Shangri-La Australia has a staff headcount of approximately 682 staff (being the total number of employees employed by Lilyvale and Shangri-La Cairns), comprising:

- 516 approximate staff headcount employed by Lilyvale; and
- 166 approximate staff headcount employed by Shangri-La Cairns.

Our Operations

The operations¹ of the Australian Shangri-La Reporting Entities are located and take place in Australia. Shangri-La Australia operates two hotels in Australia:

- Shangri-La Sydney Hotel (which is owned by Lilyvale); and
- Shangri-La Cairns Hotel (which is owned by Shangri-La Cairns).

¹ Meaning the activities undertaken by the Australian Shangri-La Reporting Entities to pursue their business objectives and strategy in Australia or overseas, as set out in the Commonwealth Guidance.

Main operations of those entities 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.

As part of our operations, we run a variety of restaurant, spa and retail services as follows.

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

Our Supply Chains

We have a wide range of suppliers who are mainly located in Australia. Some group suppliers operate overseas in Asia, Europe and the Americas (USA and Canada).

Arrangements between the Australian Shangri-La Reporting Entities and their suppliers are generally stable, longer-term relationships and we actively seek supply chain partners that are committed to good practices. All day-to-day suppliers participate in our e-tendering processes and are engaged under contracts with terms ranging from 3 to 12 months.

Our standard operating procedure for new supplier onboarding is comprehensive. Before becoming a supplier for an Australian Shangri-La Reporting Entity, a business needs to read and agree to be bound by our Global Supplier Code of Conduct and provide relevant supporting compliance documents before we can enter the supplier's details into our portal for registration and qualification.

A number of our Australian suppliers are themselves reporting entities under the Modern Slavery Act, including, one of our cleaning suppliers at Shangri-La Hotel Sydney.

The Australian Shangri-La Reporting Entities have mapped out our supply chains at a high level as set out in the following table:

No.	Product/Service category	Key themes
Key direct suppliers used in relation to core product and service offerings		
1.	Food	Our food suppliers for Shangri-La Sydney and Shangri-La Cairns are based in Australia, with the majority of food products sourced locally. We source some products, such as coffee beans,

No.	Product/Service category	Key themes
		from overseas, however our coffee beans are roasted locally in a factory.
2.	Beverage	Our beverage suppliers for Shangri-La Sydney and Shangri-La Cairns consist of three categories: • Local winery located in Australia and supplying directly to hotels. • Local liquor distributor that imports spirits from overseas and local and sells to Shangri-La Sydney and Shangri-La Cairns. • Local water supplier that bottled water directly to the hotels.
3.	Bedding/linen	• Our bedding and linen is manufactured by a supplier that is based in the USA with an appointed agent in Australia. The company sources its products from several countries including India, Pakistan, Turkey and Vietnam.
4.	Cleaning services	• Our cleaning services include: • 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; and • dish cleaning - these services are supplied by a third party. • Each of our cleaning suppliers are contracted with for no more than 3 years at a time. • These supplied products and services support our key offerings to our guests and visitors. • Some of our suppliers are located overseas, including in China, South East Asia, Europe, and the USA.
5.	Labour supply other than cleaning (security, massage services, restaurant workforce)	We engage third party contractors across security labour, massage labour, and food and beverage labour. Some of these companies are based in Australia and some of these companies have parent companies located overseas.

No.	Product/Service category	Key themes
R6.	Televisions	Shangri-La televisions are tendered out to major Australian based companies that are appointed agents supplying Samsung TVs to hotels.
7.	Guest supplies	Our group suppliers for guest supplies for both wet and dry amenities are based in Hong Kong, USA, Japan and Italy.
8.	Computer hardware	Our suppliers for computer hardware for desktop computers, monitors, laptops are group contracted based in China and/or USA.
9.	Equipment repair/maintenance	Shangri-la Sydney and Shangri-La Cairns have service and maintenance contracts with suppliers based in Australia. This ranges from laundry equipment to essential plant equipment.
10.	Laundry services	Shangri-La Sydney and Shangri-La Cairns engage in local suppliers for maintenance of laundry equipment across both properties.
11.	Furniture	Shangri-la Sydney and Shangri-La Cairns engage multiple furniture suppliers based in Australia and overseas. Furniture can be manufactured locally or overseas in China or USA.
12.	Water	Shangri-La Sydney and Cairns purchase bottled spring water from local suppliers based in Australia for guest consumption in their hotel rooms. Shangri-La also engage in local suppliers for water systems dispensing filtered Australian water.
Indirect Suppliers		
13.	Office supplies	Shangri-La Sydney and Shangri-La Cairns engage in local printers based in Australia for supply of collaterals. Operating equipment is group contracted with suppliers based in Austria, Germany, United Kingdom, Singapore. Operating equipment not purchased through group contract is tendered out locally to our direct suppliers for purchase.
14.	IT services/support	- We have an in-house IT function which services Shangri-La Hotel Sydney and Shangri-La Hotel Cairns. - Other IT services are provided by HQ support based in Hong Kong and support for our IT systems based in Australia and overseas.
15.	Professional services (i.e. marketing, legal)	We engage professional services from local Australian providers on an as needed basis. For example, we engage external legal and marketing providers from time to time.

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

Our priorities

We take a prioritised risk-based approach to managing the risk of modern slavery in our operations and supply chain. That approach is informed by high level risk mapping undertaken in connection with our previous modern slavery statements, as informed by relevant operational and supplier changes within the business.

We have focused our efforts on the following key areas which have been 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.

High level risk mapping exercise of our suppliers

We continue to monitor our risk environment and take steps to assess and address, and to mitigate, identified risks of modern slavery in our operations and supplier chain. As set out above, we have previously undertaken a high-level risk mapping exercise of our operations and supply chains in connection with our previous modern slavery statements and have updated that mapping exercise (as relevant) for this Joint Statement (see the following page).

We have assessed the risk of modern slavery in our operations as **very low** and that we are unlikely to cause or be directly linked to modern slavery. We have assessed the risk of modern slavery in our supply chains as being higher than in our operations, but still **low**.

Case Study: bedding and linen supplier

Our bedding and linen products are manufactured by a US-based supplier with an appointed intermediary in Australia. The supplier sources its products from countries including India (our available data shows that more than 90% of imports come from India), Pakistan, Turkey and Vietnam.

While the risk of modern slavery in Australia is low, we acknowledge there are inherent modern slavery risks with respect to these countries, and we have limited visibility over their supply chains. In these regions, there are heightened risks such as the use of subcontractors which can result in underpayment, excessive hours, child labour and debt bondage.

To address these risks, we ensure our suppliers acknowledge and accept our Supplier Code of Conduct, monitor ongoing risks with our suppliers, build our supplier capacity by providing training and engage in remediation activities if corrective action is required to address compliance risks and/or breaches.

RISK MAPPING EXERCISE

Category of modern slavery risk indicators	Explanation	Risk assessment
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.	We have a diverse workforce and we employ workers who are lower-skilled, young, migrants/culturally and linguistically diverse, temporary and seasonal workers, and casual staff, who may be more less aware of their workplace rights and therefore vulnerable to exploitative practices.
Sector and industry risks	The hospitality and hotel industry has been identified by a number of civil society groups as a higher risk industry.	We engage with 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).
Geographic risks	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.	We do not directly engage with any suppliers in the countries identified in relevant international indices (i.e. the Global Slavery Index, Corporate Governance Index, Fundamental Rights Index) as taking the least action in respect of modern slavery. However, we acknowledge our suppliers may engage other contractors who are located in high-risk countries, over which we have limited oversight. For example, our bedding and linen supplier is a US-based company which sources certain products from India, Pakistan, Turkey and Vietnam. In these regions, there are heightened risks such as the use of subcontractors (which creates less visibility over the supply chain), underpayment, excessive hours, child labour and debt bondage.

Category of modern slavery risk indicators	Explanation	Risk assessment
Entity risks	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.	At this stage, we have not identified any specific entity risks during this reporting period.

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

Actions taken in the reporting period

This section provides an overview of the steps we have taken or continued to implement during this reporting period to assess and address the risks in our operations and supply chains.

Initiative	Explanation
Human Rights Due Diligence	The Shangri-La Group worked with an external human rights advisor in FY24 and FY25 to establish a comprehensive, group-level human rights due diligence assessment. The purpose of the assessment is to assist the Group to: • better understand the potential and actual human rights risks associated with its operations, products, and services; and • identify gaps within its current risk management framework and determine where our human rights approach may require strengthening. This assessment is a structured, multi-phased journey spanning two years. It is now in its second year. It began with a detailed review of the current best practice for human rights processes and frameworks across our sector and operating regions. During this initial phase, we also studied relevant regulatory contexts and frameworks, conduct peer comparisons, reference global standards, and fully mapped our value chain. These activities helped us identify any areas of our value chain with exposure to human rights risks. In FY25, the Shangri-La Group developed this project by engaging with internal and external stakeholders throughout this process to ensure it considers a broad spectrum of opinions and experience and considers diverse perspectives on human rights risks, impacts, and actionable measures via structured interviews and surveys. This dialogue has provided valuable insights into perceived risks, current practices and opportunities for improvement Throughout this process, we have identified areas for improvement within our current risk management framework and determined areas where our approach to Human Rights Due Diligence could be strengthened to meet evolving global standards such as the United Nations Guiding Principles on Business and Human Rights. Our industry peer benchmarking exercise will also provide insights into the maturity of our practices and highlight opportunities to enhance our approach. The project's ultimate goal is to use the insights we gain to prioritise our human rights risks relevant to our business, based on their severity and likelihood. These findings will then be validated through workshops. The process will conclude with the development of a strategic roadmap outlining targeted actions and key performance indicators to address gaps, mitigate human rights risks, and meet stakeholder expectations. While this project remains ongoing, we are proud to have taken meaningful steps that reinforce our dedication to advancing strong human rights practices. This effort forms an integral part of our

Initiative	Explanation
	broader ambition to operate responsibly, ethically, and sustainably across all areas of our business.
Risk Monitoring	In FY25, the Shangri-La Group continued its supplier risk monitoring activities and conducted risk assessments on more than 120 of our critical Tier 1 suppliers who make up almost 30% of our procurement spend. We evaluate our suppliers' actions across five key areas: environment, labour, health and safety, business ethics and management systems. The "labour" section includes questions about child labour and forced labour. Shangri-La Group also conducted 33 questionnaires, third-party audits or surveillance assessments across our critical Tier 1 suppliers. The majority of these activities were conducted across new suppliers as the appraisals of most the existing suppliers monitored in 2024 remain acceptable, and no zero-tolerance violations were identified. When Shangri-La Group identify a risk, we collaborate with the supplier involved to develop and implement corrective action plans (CAPs). CAPs serve as a roadmap for our suppliers, outlining specific actions, timelines, and responsibilities to mitigate the identified risks and ensure compliance with our standards and requirements. This collaborative and proactive approach addresses root causes, fostering a culture of continuous improvement that helps suppliers stay compliant and mitigate future risks. In FY25, Shangri-La Group issued 26 CAPs to suppliers.
Global Training and Development	<i>Global Modern Slavery Training</i> Our employees undertook a compulsory online training course about modern slavery and human rights as part of its core curriculum, via the Shangri-La Academy (our online training platform) (Global Training). The Academy has courses on this and other topics covering work health and safety, and procurement. The Global Training has been prepared by the Shangri-La Group to inform staff what is modern slavery and human trafficking, signs of modern slavery in the hotel industry, and incident reporting procedures. The Global Training has been developed to: • be bespoke and specific to the Hotel Industry and Shangri-La Group; • highlight key policies (such as our Human Rights Policy and Supplier Code of Conduct); • include specific indicators of red flags and what to look out for; and • make clear how to report an issue or concern. <i>Responsible Sourcing and Risk Monitoring Training</i> In FY24, Shangri-La Group also conducted responsible sourcing and risk monitoring training for the Procurement teams at its headquarters and regional offices. The training focused on supplier assessment and development, as well as local sourcing strategies. These important sessions enhanced our employees' understanding of responsible procurement practices and ethical sourcing. In FY25, the Procurement teams in the Shangri-La Group used this training to

Initiative	Explanation
	develop more responsible procurement practices and ethical sourcing of products and services, which have been implemented locally.
<i>Purchasing Processes</i>	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. As part of this process, pre-qualification screenings are conducted to determine whether the potential suppliers meet 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.
Supplier Capacity Building	The Shangri-La Group undertook a review of all violations of the Global Supplier Code of Conduct in its assessment reports and conducted a root cause analysis in FY25. The review found that most violations were related to work health and safety standards. The Shangri-la Group has begun prioritising building up supplier capacity and by providing targeted training and guidance on work health and safety during supplier engagement and capacity-building activities, which include providing training face-to-face and digitally.

Global Policies and Procedures

The Australian Shangri-La Reporting Entities are 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.

Policy	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. Our Code of Conduct applies to our global and local suppliers. Failure to comply with any provision in our Code of Conduct may result in the termination of the business relationship with the Shangri-La Group. To date, 99% of suppliers have accepted, acknowledged or signed our Global Supplier Code of Conduct, confirming they do not engage, practice or contribute to any modern slavery. However, the Shangri-La Group acknowledges that:

	• it can only enforce the Global Supplier Code of Conduct in respect of its immediate suppliers with whom it conducts direct business; and • while the Global Supplier Code of Conduct specifies it does not have direct suppliers engaging in modern slavery, for larger corporations with multi-tier supply chains, it is difficult to have oversight over their whole supply chain.
Global Code of Conduct and Ethic 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	The Human Rights Policy specifically prohibits discrimination and harassment, any forms of forced labour, including trafficked, coerced, bonded, indentured or 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.
Responsible Sourcing Policy	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 record keeping, and responsible and continuous improvement. In FY25, the Shangri-La Group updated the Responsible Sourcing Policy to better integrate sustainability as a key consideration in our supplier selection and supplier management processes. The policy update prioritises suppliers that provide relevant sustainability evidence, including certifications, maintenance of internationally recognised management systems, support for local sourcing, the communities that they operate in, and risk assessment reports.
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, to positively impact local communities. 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 effective, proactive action to mitigate supplier-related risks, including unethical practices, environmental damage, and human rights violations. Our Responsible Sourcing Programme encompasses the following six components:

	• Supplier Code of Conduct: ensuring all suppliers acknowledge and accept the requirements of our Supplier Code of Conduct; • Risk assessment: assess and determine risk of critical suppliers by considering spend, country, reputation, industry and product type (having regard to international indices that cover ESG topics, including human rights, quality of living and corporate governance); • Risk monitoring: monitor risks for critical suppliers by conducting: • online self assessment covering our five key elements of our risk monitoring approach, including Environment, Labour, Health and Safety, Business Ethics and Management System; • on-site independent third party audits (which may occur as an announced or unannounced audit); • on-site surveillance assessment which is used as a supplementary tool if necessary (for example, if a supplier is suspected to have engaged in zero-tolerance violations of the Global Supplier Code of Conduct such as employing children or forced labour); and • monitoring technology to collect and analyse supplier data and news, which provides greater visibility over regulatory requirements, geopolitical and environment issues and other risks associated with our suppliers; • Risk mitigation and remediation: providing remediation through corrective action plans and supplier mentoring. Using best practice and benchmarking against the industry; • Supplier capacity building: providing training on expectations for suppliers, delivered face-to-face and digitally; and • Risk analysis and reporting: to enforce regulatory compliance. Further, our procurement F&B and Project and Design teams oversee responsible sourcing activities according to strict KPIs, which is regularly reported to executive management per our internal governance Integrated Assurance Framework.
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. In August 2025, the Grievance Handling Policy was updated to include changes regarding extending the applicability of the policy to simplify the and enhance the clarity of escalation processes. It was also amended to align with the Code of Conduct and Ethics,

	supplementing the principles and procedures of grievance handling and incorporating requirements on conflict-of-interest disclosure.
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Local Initiatives

During the FY25 reporting period, we also had local initiatives to assess and address modern slavery risks.

Initiative	Explanation
Anti-Modern Slavery Policy	We have implemented our Anti-Modern Slavery Policy through mandatory training for all staff members and maintaining training completion records. We have also implemented the Anti-Modern Slavery Policy as part of our onboarding process for new starters which requires new starters to read and acknowledge they understand and agree to comply with the policy. The objective of the Policy is to assist us to monitor high risk suppliers, mitigate risks and set out our expectations regarding modern slavery risks and report on modern slavery incidents.
Labour and Monitoring Systems	We continue to use 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 <i>Fair Work Act 2009</i> (Cth) regarding minimum wage requirements for which we fully comply.
Contractor audit	We continue to audit our contractors, which requires 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. As a result of our contractor audits, we identified several expired documents, and we were able to contact the relevant contractors to obtain updated documentation. Our contractors are also required to provide an annual statutory declaration advising us that they pay their workers in accordance with local laws and samples of employment contracts, pay slips and visa documents in accordance with local laws. This document request usually occurs in or around the time minimum pay rates are increased. With the upcoming increase to the minimum wage and applicable award wages from July 2026, we will also be requesting updated

Initiative	Explanation
	documents from all contractors to enable us to assess and ensure legal compliance. During our contract renewal process, we also require all contractors to provide updated licences to the extent necessary to continue to provide their services.
Modern Slavery Working Group	Following the establishment of our multi-disciplinary Modern Slavery Working Group in FY23, we continue 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. The Modern Slavery Working Group has members from Shangri-La Sydney Hotel, Shangri-La Cairns Hotel and other overseas locations within the Shangri-La Group. Our Modern Slavery Working Group continues to work with modern slavery experts in Australia to help develop and refine our approach to assessing, addressing and mitigating risks of modern slavery.
Modern Slavery Training	In FY25, we required our staff to complete the compulsory Global Training to 'Recognize Signs of Modern Slavery and Human Trafficking' via the Shangri-La Academy.
General Induction Training	Our hotels in Australia (such as Shangri-La Hotel Sydney and Shangri-La Hotel Cairns) continue to 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.

Due diligence undertaken

The due diligence we have undertaken with respect to modern slavery is set out above. It has been conducted at a Shangri-La Group level.

Remediation not required

To date, we have not been required to undertake remediation with respect to modern slavery as no instances of modern slavery have been identified in our operations or supply chain.

CRITERION 5: DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS

In FY25, we tracked our performance against the modern slavery key performance indicators (**KPIs**) outlined in the table below 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.

This includes activities such as tracking completion rates of mandatory Anti-Modern Slavery training via the Shangri-La Academy, monitoring supplier adherence to the Supplier Code of Conduct, and ensuring the Modern Slavery Statement is communicated and accessible across the organisation. These measures are regularly reviewed to assess compliance, raise awareness about modern slavery, and support continuous improvement against established KPIs.

No.	Key Objective	Key Performance Indicator	Assessment of KPI
1.	Implement our Anti-Modern Slavery Policy	We have implemented our Anti-Modern Slavery Policy through mandatory training for all staff members and maintaining and tracking training completion records via the Shangri-La Academy. We have also implemented the Anti-Modern Slavery Policy as part of our onboarding process for new starters which requires new starters to read and acknowledge they understand and agree to comply with the policy. We have monitored the effectiveness of this implementation process by reviewing training completion rates in the Shangri-La Academy system and compliance with onboarding requirements to assure that the policy has been successfully embedded across the business. We have also implemented processes to ensure Shangri-La's Anti-Modern Slavery Policy and the Modern Slavery Statement is communicated and accessible across the organisation and embedded the Shangri-La's Anti-Modern Slavery into onboarding and ongoing compliance frameworks across the organisation. For example, it is a mandatory requirement for all employees to achieve a 100% training completion rate on modern slavery training to qualify for certain performance outcomes such as their annual bonus eligibility, and it is also linked to their Balanced Scorecard, a target matrix established by Head Office for all Shangri-La properties and is aligned with the organisation's performance-based incentive framework.	All employees who commenced employment prior to 30 November 2025 successfully achieved 100% training completion rate. We consider that we have achieved full compliance and met our KPI within this cohort.
2.	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 the Shangri-La Australia Reporting Entities during FY25.	We have not been required to assess the effectiveness of this KPI during FY25 given that there was no modern slavery or ethics issue which was raised during the year.
3.	Ongoing training and education, including educating staff	Whether modern slavery training and education for staff has occurred during the next reporting period and how many staff members completed the training.	From 15 October 2025 to June 2026, Shangri-La Sydney has a completion training rate of 57% and Shangri-La

No.	Key Objective	Key Performance Indicator	Assessment of KPI
	on Shangri-La's Anti-Modern Slavery Policy	Our Learning & Development (L&D) team monitors training completion on a weekly basis through the Shangri-La Academy platform. Regular reporting is provided to department leaders to ensure visibility of progress, reinforce accountability, and support timely follow-up with team members to complete the training as soon as possible. This structured approach ensures ongoing monitoring of policy implementation effectiveness and supports the continued integration of modern slavery compliance obligations across the business. In FY25, the Shangri-La Group also rolled out Global Training on Modern Slavery which was compulsory for all staff.	Cairns has a training completion rate of 59%. We have established a clear target to achieve a 100% training completion rate across both Shangri-La Sydney and Shangri-La Cairns by 1 November 2026, and we will continue to monitor training completion rates up to 1 November 2026. We acknowledge this is area for improvement.

CRITERION 6: DESCRIBE THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS (A JOINT STATEMENT MUST ALSO DESCRIBE CONSULTATION WITH THE ENTITY GIVING THE STATEMENT)

As the Australian Shangri-La Reporting Entities are largely governed by the activities of the Shangri-La Group, Shangri-La Australia consulted with Lilyvale, Shangri-La Cairns and the Shangri-La Group in preparing this Joint Statement.

There is a Modern Slavery Working Group consisting of key stakeholders from both hotels in Australia, and with members from overseas offices of the Shangri-La Group. Its members include individuals from human resources, finance, procurement, legal and general management. The Modern Slavery Working Group conducts consultation meetings with these key stakeholders across the Group to gather information and invite them to suggest changes to this Joint Statement prior to Board approval.

With respect to this Joint Statement, the draft Joint Statement was circulated to members of Shangri-La's Modern Slavery Working Group and key stakeholders across the Group for review and input. Feedback was then gathered through a consultation process, including meetings and written submissions, to incorporate suggested changes, improvements, and best practice. The revised statement was then consolidated and reviewed, with final approval provided by Head Office before implementation and alignment across all properties.



CRITERION 7: PROVIDE ANY OTHER RELEVANT INFORMATION

We intend to continue our focus on assessing and addressing risks to modern slavery in our operations and supply chains in future reporting periods.