

Modern slavery statement for Lux Group Limited for financial year ending 30 June 2025

1. Introduction

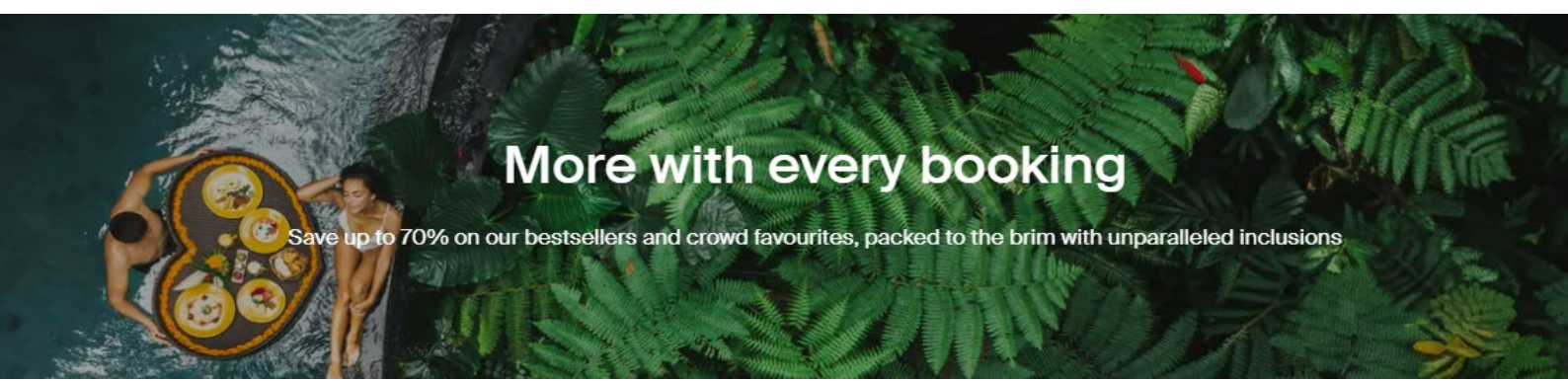
- (a) Slavery, servitude, forced and compulsory labour and human trafficking represent grave human rights abuses.
- (b) Lux Group Limited (ACN 601 688 966) (**Lux Group, we or our**) is committed to:
 - (i) operating responsibly; and
 - (ii) establishing and adhering to the highest ethical standards.
- (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) (**the Act**).
- (d) This Statement relates to the reporting period ending 30 June 2025 (**Reporting Period**).

2. No tolerance and continuous initiatives

- (a) 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.
- (b) 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.

3. About Lux Group

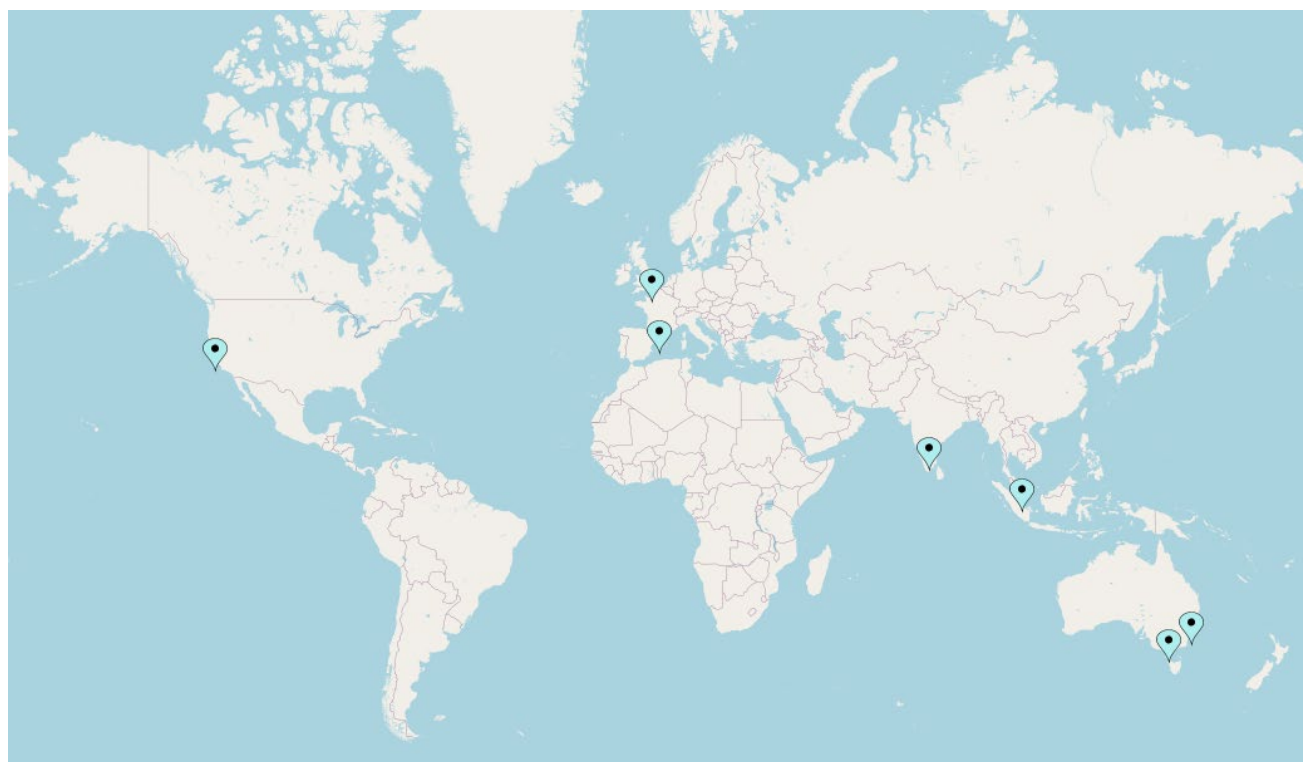
- (a) Lux Group Limited, headquartered at Level 4, 68 Clarke Street, Southbank, Victoria, 3006, is an Australian-based travel company specialising in curated travel experiences and premium getaways. Through our flagship platform, Luxury Escapes, and associated brands, we provide millions of travellers with exclusive access to exceptional holiday packages, accommodation and experiences across the globe.
- (b) Our purpose is to create unforgettable travel moments for our customers, making luxury travel more accessible, personalised and seamless. We operate across:
 - (i) a growing number of markets, with a strong presence in Australia, New Zealand, Southeast Asia; and
 - (ii) an expanding footprint in the United States, India and the United Kingdom.



- (c) Since our inception, Lux Group has evolved from a niche online travel offering into one of the region's most trusted travel brands, with a loyal customer base and a reputation for value, quality and innovation. Our business model blends best-in-class digital commerce with handpicked partnerships across the hospitality, tourism and lifestyle sectors.
- (d) Our subsidiaries include the following companies (which are the main operating entities):
 - (i) Lux Operations Pty Ltd (ACN 165 262 055);
 - (ii) Luxury Escapes Travel Pty Ltd (ACN 150 650 927);
 - (iii) Luxury Escapes Business Traveller Pty Ltd (ACN 666 997 388);
 - (iv) Luxury Escapes (Singapore) Pte Ltd (NZBN 9429047462847); and
 - (v) Lux Retail (VIC) No.1 Pty Ltd (ACN 658 430 534).
- (e) Our broader portfolio also includes a range of travel and lifestyle brands that cater to diverse markets and consumer segments:
 - (i) Scoopon;
 - (ii) Cudo;
 - (iii) Deals.com.au;
 - (iv) TreatMe; and
 - (v) Spreets.

4. 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:

Technology

We develop and maintain advanced digital platforms that power our booking engines, mobile applications and customer experience tools. Technology is central to our ability to scale, optimise travel discovery and deliver seamless end-to-end experiences.

Accommodation and hospitality

We work closely with a global network of hotels, resorts and experience providers to curate exclusive travel packages and bespoke stays. Our partnerships span luxury accommodation, boutique properties and destination experiences.

Travel services

We offer a full suite of travel solutions including holiday packages, flights, tours and corporate travel management through our Luxury Escapes Business Traveller division (**Business Traveller**). Our offerings cater to both leisure and business travellers across key domestic and international markets.

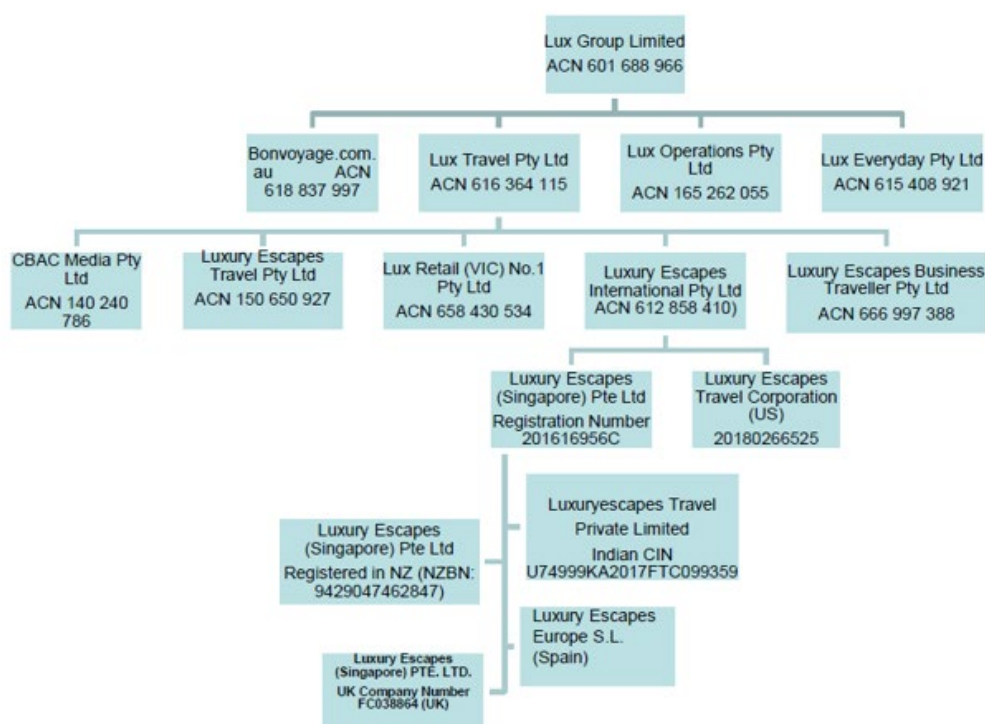
Marketing

We operate a sophisticated marketing function that integrates brand strategy, digital performance marketing, customer insights and content creation.

E-commerce for travel and leisure

As a digital-first business, we specialise in direct-to-consumer e-commerce, enabling customers to discover, book and manage travel and lifestyle experiences online. Our platforms also support gifting, exclusive deals and loyalty campaigns, driving value for our customers.

- (c) Our group company structure chart is as follows:

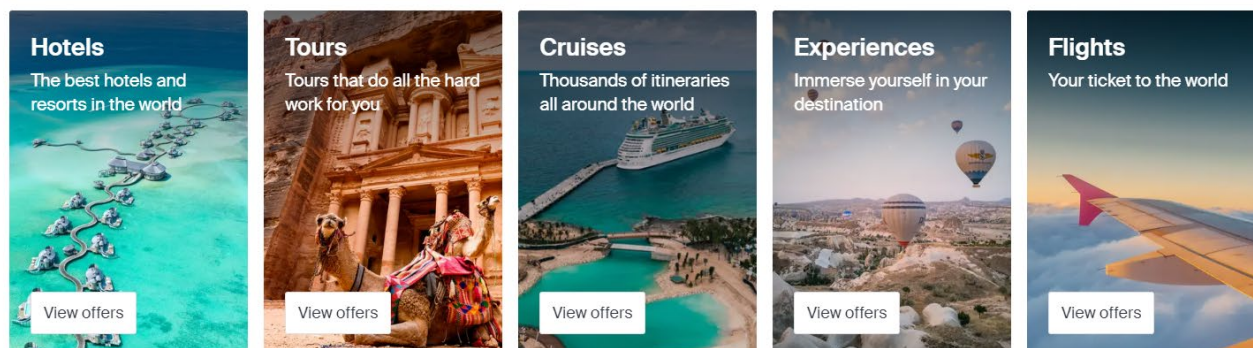


5. Supply chain structure

- (a) Lux Group employs approximately 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) We maintain ongoing consultation with our owned and controlled entities to support a consistent and coordinated approach to managing modern slavery risks across our operations and supply chains. This includes ongoing engagement with subsidiaries, such as through scheduled team meetings.
- (c) Our supply chain is sophisticated and comprises over approximately 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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- (d) 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.
- (e) We are selective in engaging suppliers to ensure modern slavery risks are minimised, including conducting risk-based assessments on remote and offshore suppliers where visibility may be more limited.
- (f) To support our governance processes, Lux Group has, during the Reporting Period, further implemented a number of policies which assist to govern our supply chain and business operations. This includes 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. A confidential, third-party whistleblower service remains available to employees and other representatives to report concerns anonymously.

- (g) We continue to work through updates to these policies to ensure they continue to meet changing industry and international expectations.

6. 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. These risks arise across several dimensions, including geographic location, industry type, labour practices, and broader political or economic instability.
 - (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 remain vigilant and continue to monitor for signs of unethical 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 prioritise measures to safeguard against exploitation within these sectors. Specific risk areas may include:
 - (A) air products (airlines, charter flights): risk of underpayment and excessive working hours;
 - (B) accommodation and hospitality (including resorts and hotels): underpayment, excessive working hours, and potential child labour, particularly among cleaning, kitchen and maintenance staff;
 - (C) cruise ships: underpayment, withholding of passports or wages, and excessive working hours;
 - (D) tour operators and transport providers (including drivers): underpayment and excessive working hours; and
 - (E) uniform and technology providers: underpayment, child labour, and excessive working hours.
 - (iii) **Labour intensity:** Certain aspects of our supplier operations demand high labour inputs, which can heighten the risk of modern slavery. This may include unsafe working conditions, coercion and underpayment of wages. We aim to mitigate such risks through engagement with our suppliers and promote fair labour practices, particularly in remote or offshore engagements.
 - (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.

- (vii) **Political instability:** Political unrest and armed conflict are known to increase the risk of modern slavery, including forced migration, debt bondage and child trafficking. We acknowledge the need to maintain heightened awareness of these risks, and as part of our proactive approach, we intend to work towards implementing internal processes to mitigate against modern slavery risks.
- (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 division if we are offering credit terms. We plan to implement further supplier risk assessment processes in the future across the business.

7. Focus areas for the next 12 months

Lux Group remains committed 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. As a travel business with a diverse and global supplier network, we understand the importance of remaining proactive in identifying and responding to the evolving risks in our operations and supply chains.

Over the next 12 months, we will continue to strengthen our modern slavery framework in alignment with the Act and emerging regulatory expectations and to build capability across our business. Our focus areas for the next 12 months will be on enhancing internal capability and deepening engagement across our operations and supply chains, and will include continuing to:

- (a) promote our Code of Conduct, Whistleblower Policy and Workplace Health and Safety Policy which outline our expectations regarding ethical conduct, fair labour practices and transparency from all our employees and suppliers. These documents remain the basis for setting clear behavioural standards for our employees and suppliers across our network;
- (b) review and update supplier agreements where necessary, including the incorporation of modern slavery clauses in supplier contracts;
- (c) respond to growing customer expectations. A key development in this Reporting Period has been our growing role as a supplier to large organisations, particularly through our Business Traveller division. As a result, we are increasingly required to respond to modern slavery due diligence questionnaires from enterprise clients, including large corporates, financial institutions and other commercial partners engaged in joint campaigns (eg credit card promotions);
- (d) work towards implementing a modern slavery risk assessment framework, with a focus on gradually expanding its application across more subsidiaries, business units and suppliers, particularly in higher-risk sectors;
- (e) promote training for our employees to identify and address modern slavery risks. We will aim to roll out modern slavery awareness training for staff, focusing on how to recognise indicators of modern slavery and respond appropriately. This training will be embedded into onboarding and refresher programs to ensure sustained awareness; and

- (f) engage with our suppliers and stakeholders, where appropriate, to support improvements in industry standards and responsible practices. This includes working collaboratively with our suppliers to address risks and improve transparency, including through enhanced due diligence processes, contract reviews, and capacity-building initiatives. Where appropriate, we will encourage suppliers to adopt similar frameworks and report on their own risk mitigation efforts.

8. Consultation with our related entities and commitment from Lux Group's leadership team

- (a) This Statement is made pursuant to section 13(1) of the Act.
- (b) It constitutes the statement of Lux Group Limited for the year ended 30 June 2025.

Our leadership team is committed to the fight against modern slavery and human trafficking. This Statement has been approved by the Board of Directors of Lux Group Limited and is signed by our Co-Founder & CEO, reflecting our dedication to ethical practices and human rights.



Adam Joseph Schwab
Co-Founder & CEO

24 July 2025

Date signed