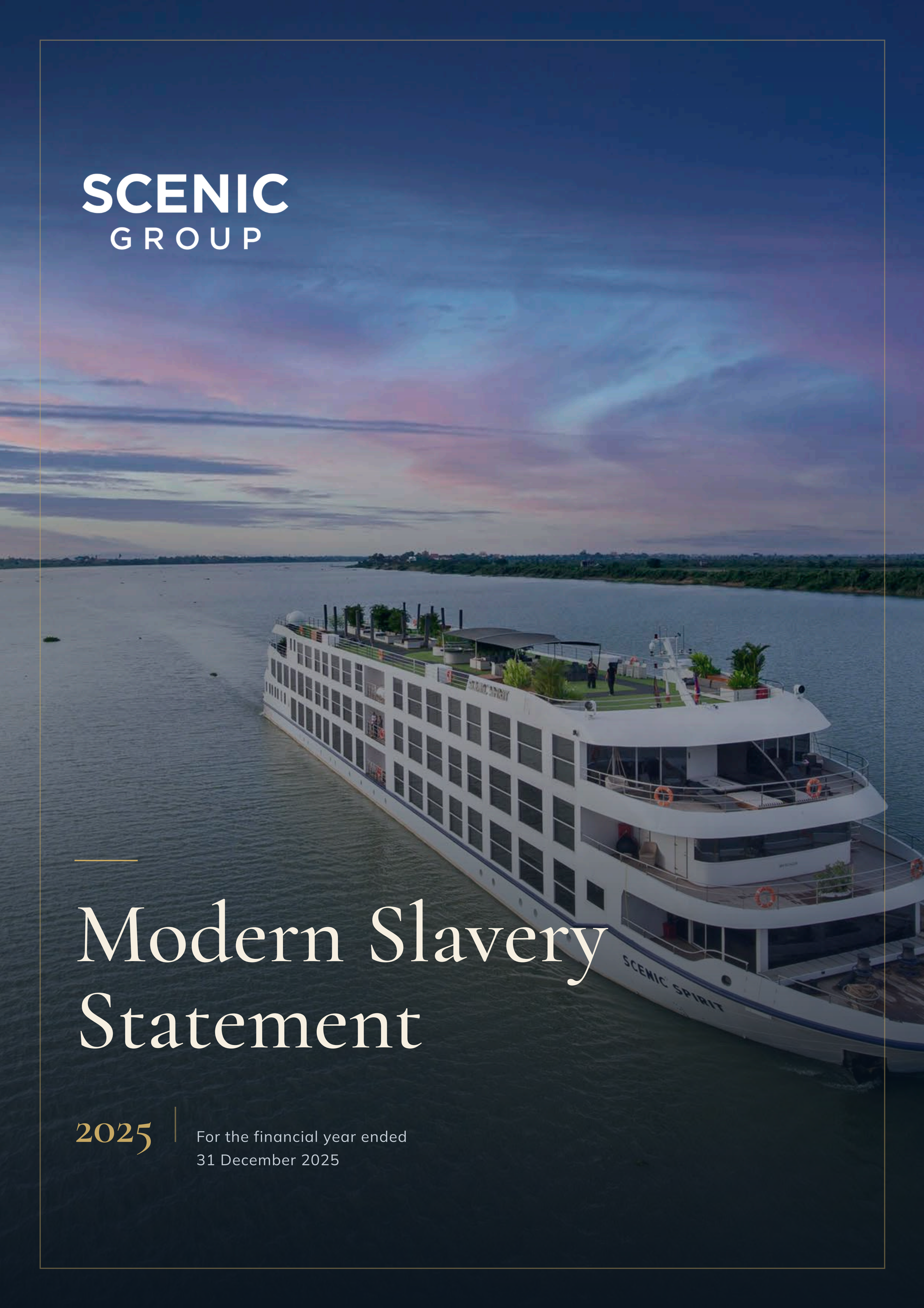


SCENIC GROUP

Modern Slavery Statement

2025

For the financial year ended
31 December 2025

Contents

FOREWORD

A message from our Founder & Chairman

At Scenic Group, we believe that true luxury is defined as much by integrity and respect for human dignity as it is by exceptional service. That belief shapes how we operate as a business, and it is the starting point for everything in this Statement.

This is our second Modern Slavery Statement, and it reflects the progress we have made since we published our inaugural Statement last year. We operate across three jurisdictions that have introduced modern slavery reporting obligations, Australia, Switzerland and the United Kingdom, and we remain committed to being transparent about how we are identifying and responding to modern slavery risk in our operations and supply chains.

Building on the foundations established in our first Statement, this year we have substantially deepened our understanding of our supply chain. We completed a structured inherent-risk screening of more than 1,321 active tier-1 suppliers across our reporting entities, drawing on a range of independent, internationally recognised indicators of country and sector risk. The exercise confirmed what we know to be true of every operator in our industry: the inherent modern slavery risk in cruise and tour services is real, and our supply chain reflects the global nature of the experiences we deliver. Critically, it also gave us a clear, prioritised view of the suppliers and jurisdictions where our due diligence efforts should be directed in the year ahead.

Alongside this screening, we rolled out modern slavery awareness training to our procurement and operational teams during the year, ensuring that the people making day-to-day decisions about our supply chain understand the risks we are working to address and the role they play in identifying and escalating concerns.

We are honest that the journey is not finished. Building a credible modern slavery program is not a single project, it is a sustained, long-term commitment across procurement, operations, training and partner engagement. We will not always get this right, but we are committed to listening, learning, and making genuine year-on-year progress.

Going forwards, our priorities are to convert the insights from this year's screening into concrete supplier engagement, deepening due diligence with our highest-risk suppliers; strengthening the contractual and code-of-conduct expectations placed on our partners. We are determined to play our part in shaping a cruise and tour industry that protects the dignity of every person who contributes to the experiences we offer, at sea, on the ground, and along every link of the supply chain.

Glen Moroney

FOUNDER & CHAIRMAN, SCENIC GROUP

About this Statement

At Scenic Group we oppose modern slavery practices and, consistent with our values, are committed to identifying and managing the risk of modern slavery occurring throughout our supply chains and operations.

Scenic Group operates in three jurisdictions where modern slavery reporting thresholds have been triggered, including Australia, Switzerland and the United Kingdom.

AU

Australia

The Modern Slavery Act 2018 (Cth) requires "reporting entities" being Australian entities, or entities that carry on business in Australia, with consolidated annual revenue of at least A$100 million, to prepare and publish an annual modern slavery statement. The statement must address the seven mandatory criteria set out in section 16 of the Act (identification of the reporting entity; structure, operations and supply chains; modern slavery risks; actions taken to assess and address those risks, including due diligence and remediation; effectiveness assessment; consultation; and any other relevant information). The statement must be approved by the principal governing body, signed by a responsible member of the entity, submitted to the Minister within six months of the end of the entity's reporting period, and published on the Modern Slavery Statements Register administered by the Australian Government. Following the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024, an Australian Anti-Slavery Commissioner has also been established under Part 3A of the Act to support implementation and engagement.

UK

United Kingdom

Section 54 of the Modern Slavery Act 2015 requires "commercial organisations" defined as bodies corporate or partnerships that supply goods or services, carry on a business or part of a business in the United Kingdom, and have a total annual turnover of £36 million or more (with "total turnover" being the consolidated worldwide turnover of the organisation and its subsidiary undertakings) to prepare and publish a slavery and human trafficking statement for each financial year. The statement may cover the six matters set out in section 54(5), including organisational structure, policies, due diligence, risk identification, effectiveness and training. The statement must be approved by the board of directors (or equivalent governing body) and signed by a director (or, in the case of a limited liability partnership, a designated member). It must be published on the organisation's website with a prominent link from the homepage and is also published on the UK Government's Modern Slavery Statement Registry.

CH

Switzerland

Switzerland does not have a single dedicated modern slavery reporting law equivalent to the UK or Australian regimes. Two distinct obligations under the Swiss Code of Obligations (CO) are potentially relevant to the Group's Swiss operations.

Non-financial reporting, Articles 964a–964c CO. Public-interest companies (those with equity or debt securities listed on a Swiss stock exchange, and supervised entities such as banks and insurers) must publish an annual non-financial report covering environmental, social, employee, human rights and anti-corruption matters, where together with the entities they control they exceed an annual average of 500 full-time-equivalent employees and either CHF 20 million in balance sheet total or CHF 40 million in turnover, in two consecutive financial years.

Supply-chain due diligence, Articles 964j–964l CO and the DDTrO. Swiss-headquartered companies must conduct supply-chain due diligence and publish an annual report where they import or process certain conflict minerals (tin, tantalum, tungsten or gold) or where they offer products or services giving rise to a reasonable suspicion of child labour involvement. Small and medium-sized enterprises, and entities able to demonstrate a low risk of child labour by reference to the criteria set out in the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO), are exempt.

Scenic Leisure Holdings AG, as the Swiss-incorporated parent of the Group's European tour-services entities, has assessed its position under each regime.

In respect of the non-financial reporting obligation under Articles 964a–964c CO, Scenic Leisure Holdings AG is neither (a) a company with equity or debt securities listed on a Swiss stock exchange, nor (b) a supervised entity under Swiss financial markets legislation, including supervision by the Swiss Financial Market Supervisory Authority (FINMA) as a bank, insurance undertaking, securities firm, fund management company, collective investment scheme or financial market infrastructure. As neither limb of the "public-interest company" definition is satisfied, the non-financial reporting obligation under Articles 964a–964c CO does not apply.

In respect of the supply-chain due diligence obligation under Articles 964j–964l CO and the DDTrO, the conflict-minerals provisions are not engaged: Scenic Leisure Holdings AG operates as the holding entity for the Group's tour-services business and neither it nor the entities it controls import or process tin, tantalum, tungsten or gold. The SME exemption set out in CO Article 960a has not been relied upon, on the basis that the consolidated Swiss group exceeds the relevant thresholds.

A formal child-labour risk assessment specific to the Swiss reporting entity has not yet been conducted for the purpose of demonstrating eligibility for the low-risk exemption under the DDTrO. The Group has, however, completed a modern slavery risk screening for FY25 covering Scenic Tours Europe AG and Scenic Tours Pty Ltd, (alongside the Group's UK reporting entity that sits outside of the Swiss group), and intends to extend that screening to the broader cohort of entities controlled by Scenic Leisure Holdings AG, and to undertake a formal child-labour risk assessment, ahead of FY26 reporting. Pending the outcome of that assessment, Scenic Leisure Holdings AG is not claiming the low-risk-of-child-labour exemption for FY25.

CA Canada

The Group's Canadian operating entity has been assessed as not falling within the reporting obligation under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211) for this reporting period.

Although the entity may meet the size thresholds under the Act when intangible asset elements (restricted trust cash and prepaid expenses) are included in its financial statements, the Act applies only to entities that produce, sell, distribute or import goods, where "goods" refers to tangible physical property.

The Group's Canadian operating activities are limited to the sale of tour services, which is a service-based activity falling outside the definition of "goods", and the entity does not produce, sell, distribute or import any physical goods (incidental branded marketing merchandise distributed free of charge in support of tour sales being immaterial).

This interpretation is reinforced by Public Safety Canada's published Guidance for Entities, which records that the Act will not be enforced against entities that do not produce or import goods. The position will be reviewed annually in light of any changes to the entity's operating activities, the regulatory guidance issued under the Act, or the entity's asset profile.

JOINT STATEMENT · REPORTING ENTITIES

As such we have created a joint statement. Entities covered by this statement include Scenic Tours Pty Ltd, Islington Investment Group, Scenic Leisure Holdings AG, Scenic Ship Services AG, Scenic Tours Europe AG and Scenic Tours (UK) Ltd.

The Statement describes our approach to identifying, assessing, mitigating and responding to the risk of modern slavery in our supply chains and operations for the financial year commencing 01 Jan 2025 and ending 31 December 2025 (Reporting Period).

All data and figures quoted in this Statement are current as of 31 December 2025, unless stated otherwise. This report has been prepared in consultation with key personnel representing each reporting entity covered by the statement. Consultation involved engaging with relevant representatives to review supply chain activities and evaluate the policies, procedures, and plans in place to manage modern slavery risks.

This Statement includes the mandatory reporting criteria specified in Section 16 of the Modern Slavery Act 2018 (Cth) (AU). The content has been prepared with the intention of also meeting relevant modern slavery reporting requirements in other jurisdictions, where applicable. These criteria are referenced in the reporting index overleaf.

Reporting index

CLAUSE	REPORTING CRITERIA	STATEMENT SECTION
16(a)	Identify the reporting entity	About this Statement
16(b)	Describe the structure, operations and supply chains of the reporting entity	About Scenic Group
16(c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Identifying, assessing & addressing modern slavery risk
16(d)	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Mitigating modern slavery risk
16(e)	Describe how the reporting entity assesses the effectiveness of the actions described in 16(d)	Assessing Effectiveness
16(f)	Describe the process of consultation with: any entities that the reporting entity owns or controls; in the case of a reporting entity covered by a statement under section 14, the entity giving the statement	About this Statement
16(g)	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Other relevant information
14(2)(d)(ii)	Is approved by the principal governing body of an entity (the higher entity) which is in a position, directly or indirectly, to influence or control each reporting entity covered by the statement, whether or not the higher entity is itself covered by the statement	Approval of Statement
14(2)(e)(ii)	Is signed by a responsible member of, if subparagraph (d)(ii) applies, the higher entity	Approval of Statement

A copy of our latest Sustainability Impact Report for the 2025 reporting period is also available for download from the Scenic Group website.

WHO WE ARE

About Scenic Group

At Scenic Group we understand our operations have the potential to cause, contribute or be directly linked to modern slavery. We acknowledge the role and responsibility we have in generating awareness and implementing steps to uphold human rights and minimise the risk of modern slavery practices occurring in our operations and supply chains.

Our Structure

Scenic sells cruises via its affiliated companies based in Australia, US, Canada, UK, Singapore and Germany and it has its cruise operating teams employed by affiliates based in Switzerland and Croatia. The ultimate beneficial owner is Mr Glendon Mark Moroney. Mr Moroney also serves as a Director of the Company and sits on the Board of the holding company of the Group as Chairman, alongside the two other non-executive directors. The Board has delegated authority to conduct the day-to-day business to the Executive Committee which is comprised of the Chief Operating Officer, Chief Financial Officer and Chief Information Officer.

Our Operations

Established in 1986, we are a proudly Australian-founded company, taking our guests to the most fascinating destinations across the world.

As a leading luxury cruise line and tour operator we provide three distinct types of guest experiences, globally over ocean, land and rivers. With a fleet of four ocean vessels, twenty six river vessels and partnerships with hotels and tour operators, our handcrafted and luxury land journeys take guests to Australia, New Zealand, Canada, Africa, Japan, Korea, Europe, Egypt and the Middle East.

1986	4	26
FOUNDED	OCEAN VESSELS	RIVER VESSELS

Vessel numbers as at December 2025

Our supply chains

To deliver exceptional experiences to our guests, we rely on a diverse, multi-layered, and carefully managed global supply chain. From locally sourced gourmet ingredients and premium linens to technical services, fuel procurement, and staff uniforms, we work with a wide range of suppliers and service providers across multiple countries.

Our supply chain includes the shipbuilding yards where our vessels are built. Each ship is purpose-built, combining state-of-the-art technologies and world-class craftsmanship to meet exacting standards of comfort, elegance, and performance. The design and construction of our fleet involves partnerships with

We work closely with a network of trusted partners across the broader travel and tourism ecosystem, including airlines, tour operators, and accommodation providers to deliver seamless, end-to-end journeys for our guests.

At the heart of our operations is our dedicated and diverse workforce. This includes our team of permanent crew, onshore teams, and seasonal workers who are integral to supporting peak travel periods and providing the high-touch service our guests expect. We recognise the heightened risks that can exist for seasonal and contract workers and are committed to upholding fair employment practices across all employment types.

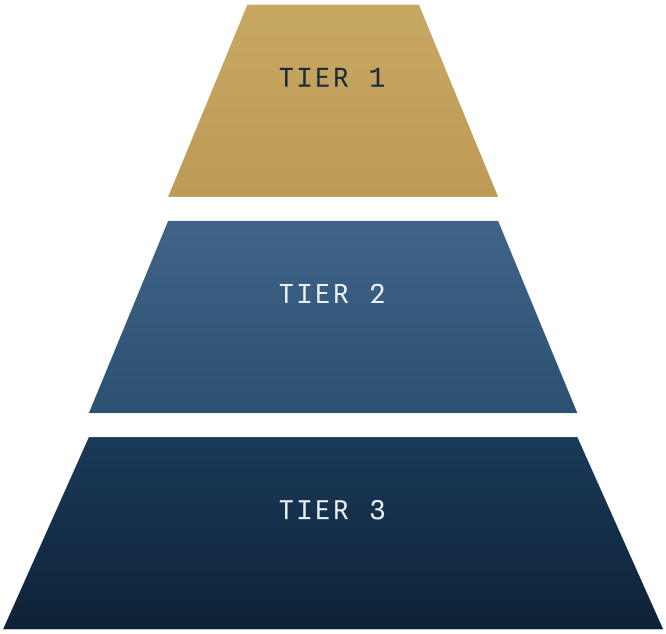
RISK

Identifying, assessing & addressing modern slavery risk

As a luxury global cruise operating company, we recognise that there can be significant modern slavery exposures within our supply chains due to the complexity and global nature of our operations.

Identifying modern slavery risk

With a strong understanding of our operations and supply chain, we recognise that potential modern slavery exposures may arise at various levels, including Tier 1 suppliers (those we contract with directly), as well as deeper within the supply chain at Tier 2 and Tier 3 levels. These potential risks and exposures, along with examples of where they may occur, are summarised on the following page.



TIER 1
Direct supplier of goods and services to Scenic Group.

TIER 2
Supplier of goods and services to a Tier 1 supplier.

TIER 3
Supplier of goods and services to a Tier 2 supplier.

Where risk may occur

Recruitment and manning agencies

TIER 1

In countries with weaker labour protections, the use of third-party agencies can lead to exploitative recruitment practices, including the charging of recruitment fees, withholding of passports or employment contracts, and inadequate working and living conditions for crew members on board.

Shipbuilding and refurbishment

TIER 1 & 2

There is a risk of forced labour and unsafe working conditions in shipyards, particularly in high-risk countries. Complex subcontracting arrangements and extended value chains can further reduce visibility and accountability.

Onboard services and hospitality roles

TIER 1 & 2

Lower-wage workers involved in roles such as housekeeping, catering, and cleaning may face long hours, threats of job loss or deportation, and exploitative contract terms, particularly where recruitment is done through third parties in high-risk regions.

Goods and consumables procurement

TIER 2 & 3

Supply chains for food and beverage products, especially in sectors such as seafood and agriculture, are known to carry high modern slavery risks. Textiles used for uniforms and linen, often sourced from Tier 2 suppliers in countries with limited labour oversight, and retail merchandise, may also involve exploitative labour practices.

Our Employees

The seasonality of employment at Scenic Group reflects the unique nature of our operations across land and sea. We engage recruitment and manning agencies for the employment of our crew. Beyond our team of permanent crew who are employed year-round, our crew members, working on board vessels, are typically employed on a seasonal or contract basis aligned with the operational schedules of our river and ocean journeys. Our ocean vessels operate globally, and our river vessels operate across Europe and Asia.

In contrast, our corporate office employees are engaged in ongoing, year-round roles that provide continuity across essential business functions such as planning, sales, marketing, finance, and sustainability.

3,654

approximate employees supporting our operations across the Scenic Group in 2025.

2025 OFFICE LOCATIONS

Australia	Cambodia	Canada	Croatia
Malta	New Zealand	Portugal	Singapore
Switzerland	United Kingdom	USA	Vietnam

Our supply chains

Our supply chains are globally distributed. Previous reviews of our total spend, undertaken in 2024, show that the highest expenditure areas are directly related to the tours we operate, provisioning for our vessels and hotel and catering services for our onboard operations. The top ten spend categories also included marketing and advertising, alongside general overhead costs that support the business but are not directly attributable to tour operations. Other significant operating costs incurred included fuel, vessel repairs and maintenance, and the procurement of goods and services for our shipbuilding division.

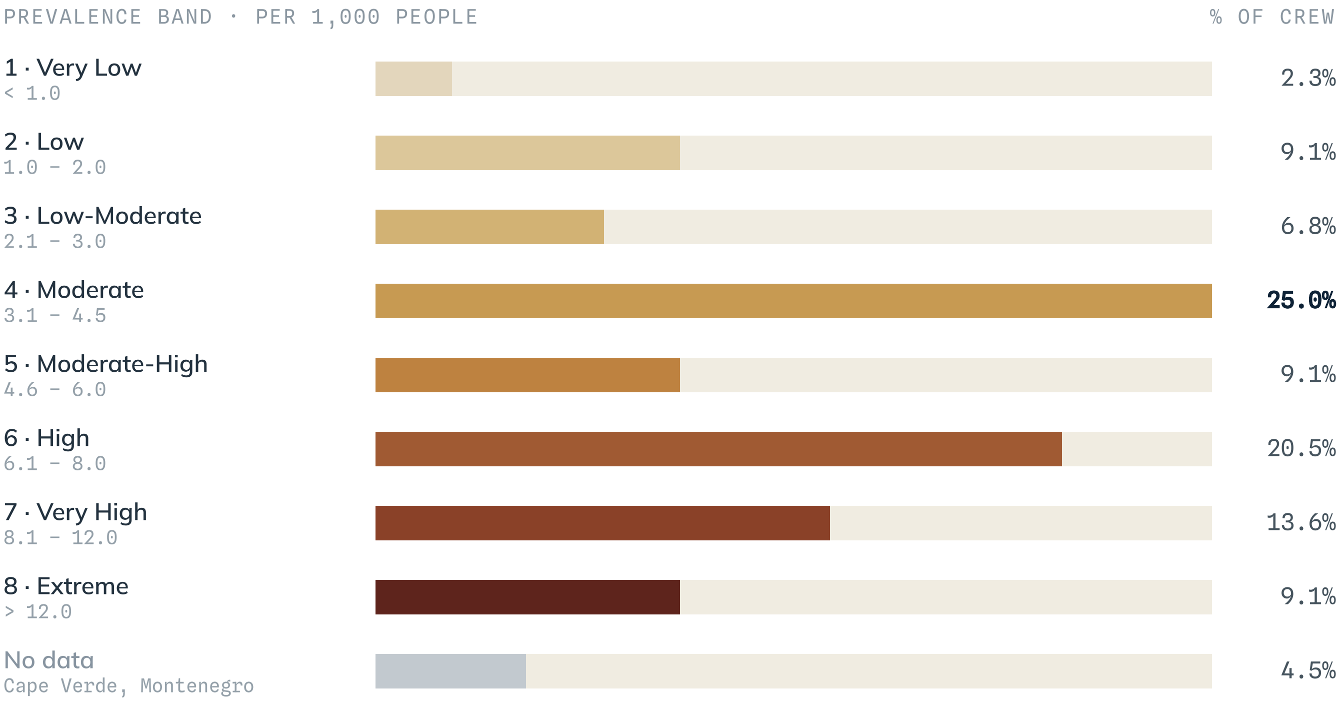
Assessing modern slavery risk

To inform our country-level risk assessment for jurisdictions from which our crew originate, we have drawn on the Walk Free Global Slavery Index 2023, which publishes an estimated prevalence of modern slavery (modelled victims per 1,000 population) for each of 160 countries. Walk Free presents these estimates on an interactive map using an eight-band sequential colour gradient ranging from Very Low (lightest) to Extreme (darkest). Our 2025 assessment covered a sample of 1,656 crew members, based on the data available at the time of reporting.

43.2%
from the three highest-prevalence bands

25.0%
largest cohort, Moderate band

1,656
crew members sampled



Source: Walk Free Global Slavery Index 2023. Band cut-offs inferred from the published visual gradient and presented as a transparent inference rather than published Walk Free thresholds. Country-specific figures can be verified at walkfree.org/global-slavery-index/map.

Crew origin analysis

Crew members' countries of origin have been mapped to the eight Walk Free Global Slavery Index 2023 prevalence bands. The analysis shows that 43.2% of our crew originate from countries in the three highest-prevalence bands (High, Very High and Extreme, collectively above 6.0 modern slavery victims per 1,000 population), with the largest single cohort (25.0%) drawn from countries in the Moderate band (3.0 – 4.5 per 1,000). A further 15.9% originate from the Moderate-High and Low-Moderate bands combined, and 11.4% from the two lowest-prevalence bands. Published prevalence data was not available for Cape Verde and Montenegro, accounting for 4.5% of our crew.

Despite the elevated country-of-origin risk, we engage reputable recruitment and manning agencies to help ensure that all crew are treated fairly and in accordance with international standards. To further assess and manage modern slavery risks, we currently conduct physical annual audits of our manning agencies to verify their compliance with the requirements of the Maritime Labour Convention (MLC).

OFFICE LOCATIONS

We have also assessed our office locations against the Global Slavery Index. One office is located in a region with a medium prevalence of modern slavery (Philippines 7.8), while the remaining locations are situated in regions with relatively low prevalence rates, ranging from 0.6 to 5.2.

Supply chain risk screening

Building on the work previously completed, we have undertaken works to further assess supply chain risk. This deepened analysis involved considering reviewed aged payables for each of the three regions where modern slavery reporting obligations exist (Australia; UK; Switzerland). Tier 2 suppliers, own operations and workforce and government/statutory bodies were not included in the scope of this screening exercise.

Across the three reporting entities, supplier composition reflects each entity's operational role within the Group. Scenic Tours Pty Ltd (Australia) and Scenic Tours Europe AG, as our two principal product-delivery entities, engage predominantly hospitality and tourism suppliers, including hotels, restaurants, ground tour operators, river-cruise port services, leisure attractions and passenger ground transport providers. In Australia, these account for approximately 70% of 972 active tier-1 suppliers in the reporting period, with financial services (12%), manufacturing-related procurement (6%) and supporting professional services making up the balance.

The Scenic Tours Europe AG supplier base of 350 entities follows a similar profile, with around 67% in hospitality and tourism, complemented by passenger ground transport, restaurants, leisure facilities, and a smaller cohort of financial and manufacturing suppliers.

Scenic Tours (UK) Ltd serves principally as a regional sales, marketing and customer-service office for its market, and its smaller supplier base of 59 active suppliers is correspondingly weighted toward financial, advertising and professional services, with a smaller cohort of hospitality and tourism suppliers supporting onward product delivery.

In respect of recruitment and labour-hire activity, ten recruitment and employment agencies were identified within the Scenic Tours Pty Ltd supplier base, supporting shore-side roles across our travel-industry sales, professional services and corporate office functions. A further one travel-industry recruitment agency was identified within the Scenic Tours (UK) Ltd supplier base. These agencies are engaged in respect of onshore corporate, sales and professional roles only. The recruitment of ship-based crew for our river and ocean cruise operations, including hospitality, deck, engine and cabin crew, is undertaken by other entities within the Scenic Group corporate structure that are not subject to modern slavery reporting obligations in the jurisdictions covered by this Statement.

We acknowledge that the recruitment of cruise crew is a recognised area of inherent modern slavery risk in our sector, and we are committed to extending the scope of our risk assessment to address crew recruitment in future iterations of this Statement as we continue to mature our approach to identifying, assessing and managing modern slavery risk across the Group.

Screening methodology

The screening combines country-level inherent risk and sector-level inherent risk into a single supplier composite risk score. Each dimension is scored on a 1 (low) to 5 (very high) scale. The composite score is the sum of the two scores (range 2 – 10) and is mapped to one of five risk bands: Low, Low-Moderate, Moderate, High, Very High. The methodology is consistent with the six-step due diligence framework set out in the OECD Due Diligence Guidance for Responsible Business Conduct (2018), step 2 (identify and assess adverse impacts) at the level of inherent risk identification.

Each country of operation was scored against five publicly available indicators, each converted to a 1–5 score, and the average taken as the country composite. Each supplier's GICS sub-industry code was mapped to one of 18 modern slavery sectors using SESG's GICS-to-MS-sector mapping. Each sector carries an inherent risk band based on the evidence base in the US DOL ILAB List of Goods, KnowTheChain, ILO Global Estimates, sector benchmarks (CHRB, RMI) and published research.

COMPOSITE SCORE TO RISK BAND

≤ 3.5	3.6 – 5.5	5.6 – 7.5	7.6 – 9	> 9
Low	Low-Moderate	Moderate	High	Very High

Composite risk = country inherent risk (1–5) + sector inherent risk (1–5), range 2 – 10. The composite is mapped to one of five bands as shown above.

Screening results

1,321
suppliers screened across three reporting entities

71%
in Hospitality & tourism (942 suppliers)

0
suppliers classified as very high risk

1,321 suppliers were screened across the three Scenic reporting entities. The supplier portfolio is heavily concentrated in Australia (709 suppliers, 54% of the population), with Canada (102), New Zealand (78), France (77), the United Kingdom (74), Switzerland (60) and Germany (53) accounting for the next largest cohorts. The 102 Canadian-located suppliers are paid by the Australian and European reporting entities for delivery of Canadian tour itineraries and accordingly remain within the screening population notwithstanding the exclusion of the Canadian operating entity from this Statement. The supplier base is also concentrated in Hospitality & tourism (942 suppliers, 71% of the population), reflecting the Group's core business as a cruise and tour operator with an extensive global network of hotels, ground operators, restaurants and excursion providers.

No suppliers screened were classified as very high risk. A total of 2.0% of suppliers were assessed as high risk, with the majority (59.1%) falling within the moderate-risk category. The remaining 38.9% were assessed as low-moderate or low risk.

All high risk band suppliers and the dominant cohort of suppliers in the moderate risk band are in the Hospitality & tourism sector. Beyond hospitality, the materially relevant sectors are Manufacturing (general), Logistics & shipping, Construction, Electronics / ICT manufacturing, Agriculture (food crops) and Apparel & footwear.

While Australia accounts for over half the supplier population, country risk in Australia is Low and the bulk of Australian suppliers fall in Moderate or below. The materially exposed countries are concentrated in the Middle East, Eastern Europe and Southeast Asia.

> Looking ahead, we are committed to undertaking enhanced due diligence and further engagement with our supply chain, particularly in the hospitality and tourism sector with an initial focus on those high-risk band suppliers.

Addressing modern slavery risk

As a global organisation, we operate across a range of regions with varying regulatory requirements related to human rights and modern slavery. At Scenic Group, integrity, responsibility, and ethical business practices are at the core of how we operate. Our commitment to these principles is embedded in the Scenic Group Code of Conduct, which sets out clear expectations for all business activities and interactions with employees, guests, suppliers, and other stakeholders.

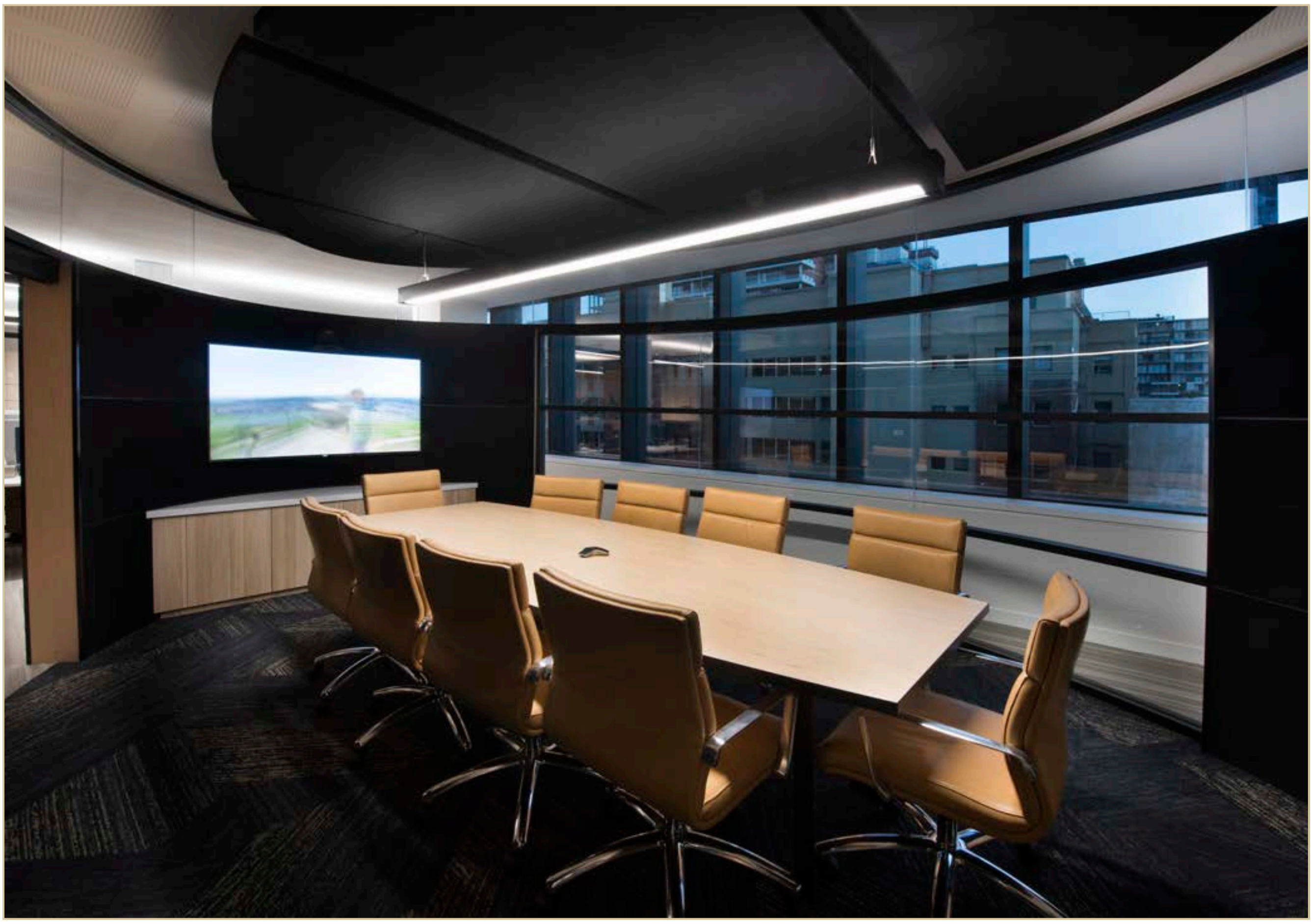
The Code applies to everyone representing Scenic Group, including employees, contractors, and consultants, regardless of their role or employment status. All Scenic Group employees have access to our Code of Conduct through our centralised system, with core guest-facing employee groups required to complete an onboarding process that includes an introduction to the Scenic Group Code of Conduct as well as other key corporate policies. Beyond our Code of Conduct, we have a comprehensive suite of policies and procedures in place to support our commitment to ethical conduct and respecting human rights.

KEY POLICIES

Modern Slavery Policy	Articulates the Group's zero-tolerance position on modern slavery and human trafficking across its global operations and supply chains and aligns the Group's approach with the relevant reporting and due-diligence frameworks in the jurisdictions in which it operates. It sets minimum expectations for employees, contractors, suppliers and business partners and assigns responsibility for oversight, implementation and reporting.
Code of Conduct	Sets out clear expectations for all business activities and interactions with employees, guests, suppliers, and other stakeholders.
Remuneration Policy	Outlines that Scenic Group is an equal opportunity employer and that it complies with all employment statutes, laws and regulations. Confirms that all employees at Scenic Group must be provided with a written contract and that this contract complies with local jurisdictional requirements.
Discrimination, Harassment and Bullying in the Workplace	Outlines measures aimed at eliminating discrimination, harassment and bullying in the workplace as well as including avenues for raising issues.
Sustainable Procurement Guidelines	Developed to address key procurement streams associated with our operations and outline expectations related to minimising environmental impacts, ensuring social responsibility whilst selecting options that provide value for money.

Key policies

Equality, Diversity & Inclusion Policy	Outlines the commitments to encourage diversity, equality and inclusion and eliminate discrimination from the workplace.
Work Health and Safety Statement of Commitment	Outlines the objectives and commitments in place to support the safety and wellbeing of workers and those affected by Scenic Group's activities.
Grievance Mechanisms	Internal grievance processes in place, with a formal grievance policy developed and due for roll out in Q1 2026. In 2025 we reviewed our existing Fraud, Bribery and Corruption policy to strengthen provisions related to whistleblower protection.
Onboard Complaints Procedure	Developed in accordance with MLC 2006 and relevant Flag State requirements. It applies to all seafarers working on our vessels and outlines the procedure for raising and responding to complaints. The policy is displayed on crew notice boards throughout the ship and is covered during onboard inductions when crew members join the vessel.



Employee & crew mitigation measures

We are committed to providing a safe and compliant working environment for our workforce across all jurisdictions, ensuring adherence to applicable labour laws and the protection of human rights. Our workforce is supported through both recruitment agencies for our land-based and river operations and specifically manning agencies for our ocean operations.

The MLC sets modern standards for seafarers' working and living conditions. It covers 5 main subject areas referred to as titles:

TITLE 1	Minimum requirements for seafarers to work on vessels
TITLE 2	Conditions of employment
TITLE 3	Accommodation, recreational facilities, food and catering
TITLE 4	Health protection, medical care, welfare and social security protection
TITLE 5	Compliance and enforcement

For manning agencies, the MLC imposes significant responsibilities to ensure the well-being and fair treatment of the seafarers they place. Key human rights related responsibilities of manning agencies under the MLC include:

- Manning agencies must not charge recruitment or placement fees to seafarers for securing employment.
- Manning agencies must be licensed, certified, or otherwise regulated by the competent authority in their country of operation. This ensures they meet certain standards and are accountable.
- Agencies have a responsibility to ensure that the shipowners they work with also comply with MLC standards.

Seafarer Employment Agreements

Manning agencies play a crucial role in the signing of Seafarer Employment Agreements (SEAs). They must ensure:

Fair Terms	The SEA is clear, easy to understand, legally enforceable, and reflects decent working and living conditions.
Opportunity to Review	Seafarers are given ample opportunity to examine and seek advice on the agreement before signing.
No Coercion	Seafarers freely enter into the agreement with a full understanding of their rights and responsibilities.
Specific Information	The SEA contains all required particulars, including wages, hours of work/rest, leave, repatriation, and social security benefits.
Financial Protection	Agencies may be required to establish a financial system of protection (e.g. insurance) to compensate seafarers in cases of abandonment or if the agency fails to meet its obligations.
Complaints Procedures	Ensuring seafarers are aware of and have access to onboard and ashore complaints procedures without fear of victimisation.
No Child or Forced Labour	Strictly prohibiting the employment of persons under 16 years of age and ensuring no forced or compulsory labour is used.

Audits, grievance & reporting

With respect to our manning agencies, we conduct annual audits to assess their practices and ensure compliance with relevant MLC standards. Additionally, the agencies we engage are government-approved, as they operate in countries that have ratified the MLC and International Labour Organisation (ILO) standards.

For recruitment agencies that supply our river crew for operations, we include specific clauses in our agreements to ensure that no additional fees are charged to workers.

We have established mechanisms across all vessel operations to enable crew members to raise concerns or report grievances. Clear communication channels are outlined and made accessible to all crew via our onboard library, displayed on crew notice boards throughout the vessel, and covered during induction sessions when crew join. In addition, independent reporting lines are available to support crew who may wish to raise concerns outside of the ship's management structure.

For our ocean vessels our Onboard Complaints Procedure has been developed in accordance with MLC 2006 and relevant Flag State requirements. It applies to all seafarers working on our vessels and outlines the procedure for raising and responding to complaints.

ADDRESSING RISK · OUR SUPPLY CHAINS

Supply chain mitigation measures

Beyond working with our recruitment and manning agencies, we have commenced steps to integrate clauses in some of our contracts that reflect our commitment to respecting human rights across our supply chain.

We acknowledge and recognise the need to go further. We are now focused on strengthening this approach by developing and incorporating dedicated clauses that specifically address the management of modern slavery risks by our suppliers.

We currently offer a voluntary process for suppliers to share information about their sustainability practices, including human rights. To strengthen our oversight of modern slavery risks, we are committed to enhancing due diligence and engaging directly with those identified as higher risk.

EFFECTIVENESS

Assessing Effectiveness

We recognise that measuring the effectiveness of our actions to address modern slavery is essential to driving genuine improvement and is a mandatory reporting criterion under section 16(e) of the Modern Slavery Act 2018 (Cth). As our modern slavery program is still in its early stages of maturity, our approach to measuring effectiveness in this Reporting Period focusses primarily on process and program-governance indicators, with outcome-based indicators expected to develop in subsequent reporting cycles as our program matures and as our data improves. For this Reporting Period, we have measured the effectiveness of our actions through the following indicators.

01 Risk identification and screening

1,340+
active tier-1 suppliers screened, the full active in-scope population

25
suppliers in the High composite band requiring prioritised enhanced due diligence

60
sole-trader engagements held for further review pending classification

02 Awareness and capability

Modern slavery awareness training was rolled out to procurement and operational team members during the Reporting Period. Completion is tracked, with completion rates recorded.

Governance, grievance & improvement

03 Program governance

Year-on-year progress against the commitments set out in our previous Statement: 3 of 6 actions have been completed; and 3 have been carried forward to the next reporting cycle.

The modern slavery program is reviewed by the ESG Steering Committee, which considers the annual modern slavery work-plan and monitors progress through the year.

This Statement has been independently reviewed against the Australian Government's Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities to confirm alignment with each of the mandatory reporting criteria.

04 Grievance and remediation

Zero modern slavery concerns were raised through the Group's grievance and whistleblowing mechanisms during the Reporting Period.

05 Continuous improvement

We have established an annual review cycle for our modern slavery program, comprising: (i) a refresh of the country and sector inherent-risk screening using updated source data; (ii) a review of progress against the previous year's commitments; and (iii) an internal qualitative assessment of areas requiring further development. The outputs from this annual review inform the actions and commitments set out in the following year's Statement.

As our program matures, we expect to develop outcome-based effectiveness indicators in future Reporting Periods. These may include the proportion of supplier reviews identifying modern slavery indicators that are remediated within a defined timeframe; year-on-year trends in supplier self-assessment scores; and survey-based feedback from workers in our supply chain (where access can be appropriately facilitated through a credible third party).

LOOKING AHEAD

Other relevant information

We remain committed to continuously strengthening our approach to identifying and managing modern slavery risks within our supply chains.

In 2025, we rolled out targeted modern slavery awareness training for key personnel, to increase internal capacity and awareness.

As part of our ongoing commitment, we aim to engage more proactively with our suppliers to better understand how they are embedding responsible and ethical business practices within their own operations and broader supply networks.

PLANNED FUTURE ACTIONS

01 Communicating the Modern Slavery Policy to relevant divisions of the organisation.

02 Continuing to conduct modern slavery risk screening of our suppliers.

03 Conducting a formal child-labour risk assessment specific to the Swiss reporting entity.

04 Establishing formal processes to guide supplier engagement where elevated risk ratings are identified.

05 Developing and incorporating contract clauses that specifically address the management of modern slavery risks by suppliers.

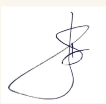
SIGN-OFF

Approval of Statement

This is Scenic Group's Modern Slavery Statement for its FY25 Reporting Period, and approval is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth).

The Statement has been approved by the principal governing body of Scenic Group and signed by our Chief Financial Officer as the responsible member representative of Scenic Group.

SIGNATURE



David Anastasi

CHIEF FINANCIAL OFFICER, SCENIC GROUP

CONTACT

Further Information

The Scenic Group website provides a range of information on our operations and our sustainability framework and associated impact reports, www.scenic.com.au

Requests for further information about our approach to modern slavery risk may be directed to:

Phil Jordan
Director of Sustainability and Delivery
phil.jordan@scenic.com.au

SOURCE REFERENCES

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Modern Slavery Statement 2025
For the financial year ended 31 December 2025