



*Small ships*  
Big destinations

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Image: Nordvestfjord, East Greenland

# 1. Introduction

This Modern Slavery Statement (the '**Statement**') relates to the financial year ended 30 September 2025 and is made in accordance with the requirements of the Australian Commonwealth Modern Slavery Act 2018 (the '**Act**') and the UK Modern Slavery Act 2015.

It describes the actions and initiatives undertaken by Aurora Expeditions Holdings Pty Ltd (ABN 25 132 510 564) (the '**Reporting Entity**') and covers the Reporting Entity and its consolidated subsidiaries (collectively referred to as '**Aurora Expeditions**', '**the Company**', '**we**', '**us**', or '**our**'). The Statement outlines our commitment to identifying, assessing, and addressing the risks of modern slavery in our operations and supply chains.

Aurora Expeditions aligns our understanding of modern slavery with the definition provided in the Act, which identifies eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour services, and the worst forms of child labour.

Aurora Expeditions is committed to operating with integrity, transparency and respect for human rights across all areas of our business. We recognise our responsibility to identify, prevent and mitigate the risk of modern slavery, including forced labour, debt bondage, child labour and human trafficking, within our operations and supply chains.

# 2. Overview

## Business Overview

Aurora Expeditions is an Australian-owned and operated adventure travel company specialising in small-ship expedition voyages to some of the world's most remote, culturally significant and environmentally sensitive regions. Aurora operates three core product types: expedition and discovery voyages, each with a maximum capacity of up to 130 guests, and small-ship cruise voyages, with a maximum capacity of up to 154 guests. Our destinations span Antarctica, the Arctic, Europe, Oceania, Asia and the Americas.

Our small-ship operating model supports lower-impact access to remote destinations, and enables close oversight of onboard activities, employment practices and supplier relationships. Voyages are delivered in line with Aurora Expeditions' approach to responsible travel, and typically include guided shore landings, Zodiac operations, wildlife observation and other educational programming.

## Business Structure

Our global headquarters are located in Sydney, Australia. We employ a diverse workforce across multiple regions, including but not limited to Australia, the United Kingdom, Argentina, Canada and the United States.

*Below: The geographic spread of Aurora Expeditions' key expedition regions and operational locations, reflecting the global nature of our voyages and supporting teams.*



## Internal Operations

Aurora Expeditions is managed by a central Executive Leadership Team (ELT), primarily based in Sydney, Australia, with select leadership also located in other operational regions including Argentina and Canada. The ELT oversees dedicated management teams responsible for Aurora Expeditions' key business functions, providing governance, oversight and accountability across operations and supply chains.

## Core internal functions

Our internal personnel include:

- **Corporate and professional services** – Supports the overall operation of Aurora Expeditions through corporate, governance and enabling functions. This includes financial management, business systems and technology, sustainability and compliance activities, and brand and marketing communications.
- **People and workforce management** – Manages Aurora Expeditions' direct workforce, including recruitment, onboarding, payroll, learning and development, employee wellbeing and global human resources systems.
- **Commercial and customer operations** – Manages customer engagement and revenue-generating activities. This includes sales, partner and agent relationships, reservations, customer enquiries, booking management, payment processing and pre- and post-travel customer support.
- **Operational delivery and external interfaces** – Responsible for the planning and delivery of expedition voyages and the coordination of activities with external partners. This includes expedition planning, vessel operations, crew coordination, logistics and compliance with maritime, safety and regional regulatory requirements, working closely with third-party service providers.

## Supply Chain

Aurora Expeditions works with a large and diverse network of suppliers to deliver safe, high-quality and responsible travel experiences. Our suppliers range from larger international service providers to smaller, local operators, depending on the services offered and regions in which we operate.

A significant portion of Aurora Expeditions' supply chain is managed through third-party ship management partners. These partners are responsible for the technical management of vessels and the sourcing and management of crew, as well as hotel and onboard service functions. This includes the engagement of crew and the procurement of goods and services required to support vessel operations and onboard hotel services.

## Supplied goods and services

Aurora Expeditions sources goods and services from a diverse, predominantly service-based supply chain to support expedition delivery and corporate operations. Suppliers range from large international providers to smaller local operators, depending on the nature of the service and the regions in which Aurora Expeditions operates.

### *Supply chain category overview*

<b>Category</b>	<b>Description</b>	<b>Supplier types</b>
<b>Technical, professional and corporate services</b>	Enabling services that support Aurora Expeditions' operations, governance, and compliance	Direct
<b>Ship charter</b>	Access to expedition vessels through charter arrangements with vessel owners, including key technical personnel	Direct, Indirect personnel
<b>Vessel management and crewing</b>	Third-party management of vessel operations and maritime labour for guest services	Direct
<b>Food and beverage provisioning</b>	Supply of food and beverage products required to support onboard and expedition operations	Indirect
<b>Expedition logistics and shore operations</b>	Delivery of destination-based expedition activities and supporting logistics	Direct, Indirect
<b>Other operations services</b>	Fuel, ground handling, port services	Direct, Indirect
<b>Accommodation and transport providers</b>	Movement and accommodation of guests and expedition personnel outside the vessel	Direct, Indirect
<b>Apparel and merchandise</b>	Procurement of branded and functional goods for guests and staff	Direct

## Supplied labour

Some suppliers provide service delivery through third-party supplied labour (for example, ship charter operations, on-board guest services). These companies operate in accordance with the Maritime Labour Convention (MLC) and maintain policies and processes seeking to identify and mitigate modern slavery risks, including recruitment standards, contractual safeguards and grievance mechanisms.

## Oversight

Oversight of human rights matters sits with the Board of Directors, which regularly monitors the Company's progress and risk profile.

Operational responsibility for modern slavery risk management is coordinated by the Sustainability Manager. This role is responsible for maintaining the modern slavery framework, including policies, reporting, supplier engagement, internal awareness and continuous improvement.

Given Aurora Expeditions' size and structure, responsibility for managing modern slavery risks is shared across relevant teams and key personnel that engage with suppliers as part of their day-to-day roles. This includes procurement, operations and other business functions, with the Sustainability Manager providing guidance and oversight to support consistent application of supplier standards and risk management practices.

## 3. Risks

We recognise that risk exposure can be present within Aurora Expeditions' operations and supply chain. This section discusses possible risks, with the potential mitigations and management of these risks in the following sections, 'Actions'.

### Internal Operations

Aurora Expeditions considers the risk of modern slavery within its direct workforce to be low. This assessment is based on the engagement of Aurora' Expeditions' employees primarily in professional, administrative, operational and customer-facing roles under formal employment arrangements, and is informed by the nature of our activities, and the application of internal policies, controls, and oversight mechanisms described in 'Actions' below.

Aurora Expeditions' direct workforce is employed in Australia, a jurisdiction with established regulatory frameworks and oversight mechanisms, and employment practices are supported by standard onboarding, payroll and human resources processes. These roles are governed by applicable labour laws, workplace health and safety requirements, and internal policies.

### Supply Chain

Aurora Expeditions considers that our greatest possibility for exposure to modern slavery risks is through our supply chain. The following table outlines our assessment of the possible risk exposures including the core supplier categories that may be associated with a potentially higher risk of modern slavery.

## Supply Chain Risk Assessment *Possible risks by supply chain category*

Supply chain category	Examples	Scale	Modern Slavery risk driver					
		By spend	A	B	C	D	E	
<b>Technical, professional and corporate services</b>	Finance, sales, marketing, technology	Top-3						○
<b>Ship Charter</b>	Leasing of expedition ships, with. technical staff	Top-3	○	●	○			
<b>Vessel Management and Crewing</b>	Labour for maritime crewing and onboard services	Medium	○	●	○	○		
<b>Food and beverage provisioning</b>	Catering inputs and consumables	Medium	○				○	○
<b>Expedition logistics and shore operations</b>	Expedition activities and excursions	Medium	○	○	○	○		
<b>Other operations services</b>	Fuel, ground handling, port services	Top-3	●	○			●	●
<b>Accommodation and transport providers</b>	Pre- and post-voyage accommodation	Minor	○	○			○	
<b>Apparel and merchandise</b>	Apparel and merchandise supplied for expedition store	Minor	●	○			●	●

Key ● = Relatively higher risk ○ = Relatively lower risk

## Supply Chain Risk Drivers *Possible supply chain risk drivers identified*

Risk driver		Description
<b>A</b>	<b>High-risk geographies</b>	Regions where weak labour protections, governance challenges or known prevalence of exploitation increases risk of modern slavery.
<b>B</b>	<b>Use of migrant workers</b>	Employment of workers who have moved across borders for work and may face heightened vulnerability due to language barriers or visa dependency.
<b>C</b>	<b>Use of seasonal labour</b>	Reliance on short-term or seasonal workers engaged for peak periods, which can increase vulnerability due to job insecurity and limited oversight.
<b>D</b>	<b>Use of low-skilled labour</b>	Employment of workers in roles requiring limited formal skills, who may have reduced bargaining power and be more exposed to exploitation risks.
<b>E</b>	<b>High-risk raw materials</b>	Materials or inputs commonly associated with labour exploitation due to labour-intensive production, complex sourcing or multi-tier supply chains.

## 4. Actions

Aurora Expeditions has implemented measures to address modern slavery risks throughout our operations and supply chain. This section will provide an overview of these measures, encompassing governance frameworks, operational controls, and supply chain management strategies.

### Governance

Aurora Expeditions has established policies, processes and accountability mechanisms to support the identification and management of possible modern slavery risks and compliance with applicable modern slavery and human rights laws. These measures are supported by Board oversight and defined internal responsibilities.

### Policies and Procedures

Human rights considerations are included in our organisation including through policies, governance structures and risk management processes. The relevant policies are reviewed periodically, apply to all our business activities and employees, and inform our expectations of suppliers, contractors and business partners.

They include:

- Anti-Bribery and Corruption Policy
- Equal Employment Opportunity and Anti-Discrimination Policy
- Human Rights Policy
- Recruitment Policy
- Whistleblower Policy
- Workplace Health and Safety Policy

### *Escalation and grievance mechanisms*

Aurora Expeditions maintains whistleblower and grievance mechanisms to enable team members and relevant stakeholders to raise concerns related to modern slavery or other unethical conduct. Reports may be made confidentially through Aurora Expeditions' whistleblower mechanism, including directly to the Whistleblower Protection Officer.

All concerns raised are assessed and managed in accordance with Company policy and applicable legal requirements.

### *Risk assessment*

Aurora Expeditions undertakes risk-based assessments to identify and evaluate potential modern slavery risks across its operations and supply chain. In making these assessments we consider factors such as workforce composition, employment arrangements, use of contractors, and geographic footprint. Risk assessments are reviewed periodically and inform the prioritisation of mitigation actions and engagement efforts across the business.

### *Training and resources*

We provide, and continue to expand, modern slavery and human rights training to build awareness across the business, with targeted training available for relevant roles.

## **Internal Operations**

Aurora Expeditions recognises that modern slavery risks within our direct operations are generally lower than those present in extended supply chains. Nevertheless, we have implemented measures within our internal operations to support the prevention, identification and escalation of potential risks.

All team members are employed under formal employment arrangements and are protected by applicable workplace laws, internal policies and codes of conduct, including those relating to human rights, ethical behaviour, workplace health and safety, and whistleblower protections, as described above. These frameworks support fair treatment, lawful employment practices and safe working conditions across the organisation.

Recruitment and onboarding processes include appropriate screening and verification steps designed to confirm an individual's right to work and alignment with Company values. Training and awareness activities are undertaken to ensure that relevant personnel, including those with responsibilities related to people management, operations and procurement, understand modern slavery risks, expected standards of conduct, and escalation pathways.

Together, these measures support Aurora Expeditions' commitment to responsible employment practices and provide a foundation for identifying and responding to potential modern slavery risks within our internal operations.



## Supply chain

Aurora Expeditions recognises that our supply chain can have economic, social and environmental impacts, and that supply chain complexity may reduce visibility over subcontractors and upstream suppliers. We therefore seek to work collaboratively with suppliers to promote ethical practices, responsible labour standards and continuous improvement.

### *Supply Chain Risk Assessment and Monitoring*

At a global level, Aurora Expeditions has implemented processes to identify, assess and monitor modern slavery risks across its supply chain, with a focus on areas of higher inherent risk.

### *Supply Chain Mapping*

Supply chain mapping is undertaken to improve understanding of the key products and services procured from third-party suppliers. Due to data availability and proportionality considerations, more detailed supplier information is prioritised for suppliers assessed as higher risk or material based on spend and nature of services provided, as well as by alignment with corporate values.

### *Supply Chain Risk Assessments*

Aurora Expeditions undertakes supplier risk assessments to develop a reasonable view of potential modern slavery risks. Suppliers are reviewed against a range of commonly recognised risk indicators, and assessment outcomes are used to inform appropriate risk mitigation actions. These assessments consider, among other factors:

- Sector and industry risk – including sector-specific exposures such as reliance on seasonal labour, unsafe working conditions, or risks associated with raw material extraction.
- Product and services risk – based on how goods or services are produced, delivered or used.
- Geographic risk – considering the location of supplier operations, including local regulatory frameworks, transparency and levels of supplier engagement, rather than country-level risk alone.
- Supply chain model risk – including factors such as supply chain complexity, use of subcontracting arrangements and overall transparency.

### *Supply Chain Risk Management*

Supplier relationships range from short-term, voyage-specific arrangements to longer-term strategic partnerships. Aurora Expeditions has introduced a range of measures to manage identified supply chain risks, taking into account the nature of the relationship and level of risk.

Where practicable, supplier contracts are structured to allow for periodic review and reassessment of performance, including ethical, labour and human rights considerations.

### *Maritime Labour Convention (MLC) protections*

Crew employment conditions are governed by the Maritime Labour Convention (MLC), an international labour convention adopted by the International Labour Organization (ILO). Aurora Expeditions operates in compliance with the MLC and works with ship managers that maintain policies and systems aligned with these requirements.

The MLC establishes minimum standards for seafarers' working and living conditions, including recruitment and placement practices, conditions of employment, hours of work and rest, payment of wages, repatriation and leave entitlements, accommodation, food and recreational facilities, and access to health protection, medical care and welfare.

Consistent with these requirements, Aurora Expeditions supports crew welfare through measures designed to promote safe working conditions, access to medical care, and crew wellbeing while onboard vessels. These measures include pre-employment medical

examinations, onboard medical facilities, access to fitness equipment, internet connectivity for personal use, and crew welfare funds. Welfare committees established onboard vessels support crew engagement and organise social, cultural and educational activities.

Together, these measures support lawful employment practices and help reduce vulnerabilities that may contribute to labour exploitation risks in maritime operations.

### *Supplier Code of Conduct*

Aurora Expeditions' Supplier Code of Conduct sets out expectations regarding ethical behaviour, labour standards, human rights, environmental responsibility and compliance with applicable laws. Where potential breaches of the Supplier Code of Conduct are identified, Aurora Expeditions seeks to respond proportionately, which may include engagement with the supplier, implementation of corrective actions, or, where appropriate, termination of the business relationship.

### *Whistleblower and grievance mechanisms*

Aurora Expeditions maintains mechanisms that enable team members and relevant stakeholders to raise concerns related to modern slavery or other unethical conduct. Reports may be made confidentially through our whistleblower arrangements, including to the Whistleblower Protection Officer, and are managed in accordance with Company policy and applicable legal requirements.

### *Supplier due diligence and engagement*

Aurora Expeditions uses publicly available information to inform its understanding of supplier risk and applies a risk-based approach to supplier due diligence and engagement. Where appropriate, we undertake targeted engagement with suppliers to improve visibility in higher-risk areas and to better understand supplier practices.

Engagement activities may include tailored dialogue with suppliers to query labour practices, governance arrangements and due diligence processes, and to confirm alignment with Aurora Expeditions' values, policies and expectations. On a limited and risk-based basis, this engagement may also include site visits, including spot audits of suppliers operating at different tiers of the supply chain, such as Tier 2 suppliers, where feasible.

Aurora Expeditions is also progressing the rollout of supplier questionnaires to support a more structured and consistent approach to gathering information on supplier practices, risk management processes and alignment with applicable labour and human rights standards.

## 5. Effectiveness

Aurora Expeditions recognises that addressing modern slavery risks is an ongoing process and that the effectiveness of our actions must be monitored and refined over time. We assess the effectiveness of our actions through internal governance processes and supplier engagement, including the periodic review of our policies, procedures and risk management practices.

To support effectiveness monitoring, Aurora Expeditions is developing and will progressively track the following indicators over time (as data availability improves):

- staff training coverage and completion rates
- depth of supply chain visibility
- number and coverage of supplier risk assessments
- supplier engagement activities (such as limited site visits)
- review of supplier and contractor agreements
- themes arising from whistleblower and grievance reporting

Insights from these indicators are used to inform the ongoing refinement of existing controls and the development of additional measures to strengthen our approach to managing modern slavery risks.

In line with UK transparency in supply chains expectations, we recognise the importance of ongoing disclosure and continuous improvement as our approach to managing modern slavery risks continues to evolve.

## 6. Improvement

Aurora Expeditions is committed to continuous improvement in identifying and addressing modern slavery risks across our operations and supply chain. Building on the measures described in this Statement, we have identified a number of priority areas for further development and enhancement.

These include:

- increasing the depth of our supply chain visibility, particularly in higher-risk areas
- providing more targeted training for procurement teams and relevant business partners
- distributing supplier questionnaires to priority suppliers to support more consistent risk assessment
- progressively embedding modern slavery-related provisions into new supplier contracts

These initiatives are outlined in our forward strategy and are intended to strengthen our ability to identify, assess and respond to modern slavery risks over time.

## 7. Consultation

In preparing this Statement, Aurora Expeditions consulted relevant internal stakeholders across the business and, where applicable, its controlled entities. This consultation supported a consistent understanding of modern slavery risks and informed the actions described in this Statement.

## 8. Approval

This Modern Slavery Statement relates to the financial year ended 30 September 2025 and has been prepared in accordance with the Australian Commonwealth Modern Slavery Act 2018 and the UK Modern Slavery Act 2015.

This Statement was approved by the Board of Directors of Aurora Expeditions, in their capacity as the principal governing body of the Reporting Entity and its controlled entities and is signed by the Chief Executive Officer of Aurora Expeditions as a responsible member of the Reporting Entity.

*Michael Heath*

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Michael Heath  
**Chief Executive Officer**  
31<sup>st</sup> March 2026

*This Statement will be published on Aurora Expeditions' website, with a link made available on the homepage in accordance with the UK Modern Slavery Act 2015.*



GREG MORTIMER

