

# Modern Slavery Statement

## for Financial Year Ending 31 March 2025

This statement is made on behalf of Imagine Cruising Pty Ltd ACN 614 987 718 as a company within the Emirates Group. The reporting entity is referred to as **Imagine** (or '**we**', '**us**', or '**our**') pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**). This statement is made in relation to the financial year ending 31 March 2025.

### Introduction

Modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services (**Modern Slavery**). Modern Slavery is a criminal activity, a gross violation of fundamental human rights and a growing concern globally.

Imagine is committed to preventing acts of modern slavery and human trafficking from occurring within its own business or in any of its supply chains and expects the same high standards from all of its contractors, suppliers and other business partners.

### Organisation's Structure, Operations and Supply Chains

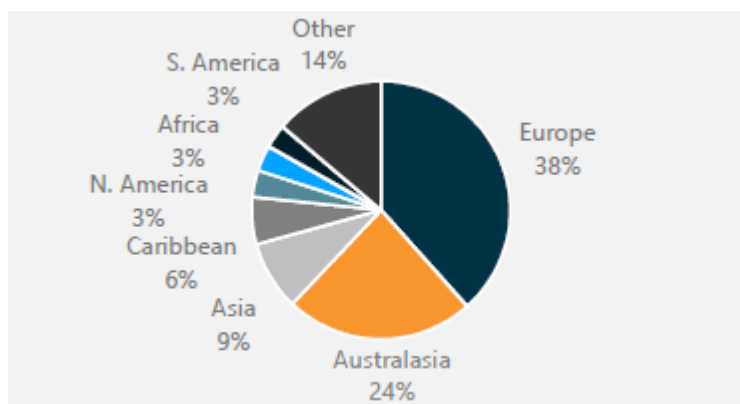
We form part of the group consisting of dnata, dnata World Travel and Emirates, together with their subsidiaries (**the Emirates Group**) whose head office is located in Dubai in the United Arab Emirates. As a global organisation with immense reach, the Emirates Group takes its moral and ethical obligation to combat Modern Slavery seriously. Imagine have business located in the UK, Australia, New Zealand and South Africa.

The Emirates Group is an international organisation with business interests in the aviation, air services, education, retail, travel and hospitality. You can learn more about the Emirates Group on our website, accessible [here](#).

Imagine is owned by dnata and specialise in the provision of creating cruise holidays for every type of traveller and every imagination. Imagine Cruising wants to take you beyond your cruising dreams. You can learn more about our business on our website: [imaginecruising.com](http://imaginecruising.com)

Our key operations and supply chains, including where we assess the highest risk of modern slavery to present itself, is described below. dnata Australia circumvents its Modern Slavery Risk through the processes described below.

Customers Split into Destinations shown below:



Business operations	Supply chains	Potential Modern Slavery risks
The business organises and sells domestic and international tours, including cruise, accommodation, transport, guides, and tours. It engages employees in office-based roles, sales, marketing, administration, and customer service. Operations involves contracting DMC's, tour leaders, ground staff, and some third-party service providers.	Supply chains include domestic and overseas providers such as hotels, airlines, cruise lines, transport operators, tour guides, and tour companies. Procurement may also include marketing materials, uniforms, merchandise, Suppliers are often located in countries with varying levels of modern slavery risk.	Risks may arise in several areas, particularly in: Overseas accommodation providers using low-paid or undocumented cleaning staff, Cruise Lines in regions where labour protections are weak. Third-party tour guides or subcontractors employed without formal contracts. Suppliers of uniforms or merchandise sourced from high-risk countries Seasonal or migrant labour used in food or hospitality services during tours.

### Actions taken to combat slavery risks

Imagine acknowledges the potential modern slavery risks within its business operations and supply chains. We will introduce enhanced due diligence and risk mitigation measures to actively assess, monitor, and address these risks across all environments in which Imagine Australia operates. This commitment includes the development and implementation of policies, procedures.

### Our policies on slavery

We are committed to acting ethically and with integrity in all our business relationships. The Emirates Group adopted an organisation-wide anti-Modern Slavery policy that advocates a zero-tolerance approach to Modern Slavery. As we are subsidiaries of the Emirates Group, we are required and proud to adhere to the Emirates Group's policy on Modern Slavery. A copy of the Group's policy on Modern Slavery and Human Trafficking can be found [Anti-Slavery and Human Trafficking Policy.pdf](#) on our website.

Imagine will ensure that all suppliers are formally notified of its Modern Slavery policy and the expectations set forth therein. Imagine will require its suppliers to comply with these high standards as a condition of engagement, and will implement ongoing communication, monitoring, and due diligence processes to verify adherence. This approach is designed to promote transparency, accountability, and shared commitment to preventing modern slavery throughout our supply chains.

### Due Diligence processes for slavery

We recognise that we cannot unilaterally solve the problem of Modern Slavery. However, to aid our efforts, we have processes in place to assess risk, undertake due diligence and effect remediation. Our due diligence processes are supported by our whistle-blower protection policy which encourages 'speaking out' against illegal and unsafe practices.

4.25.2 As part of a broader group committed to continuous improvement, we recognise that our practices and procedures must evolve over time. We will shortly commence the implementation of enhanced due diligence measures to address the risk of modern slavery within our supply chains. This will include strengthening our supplier onboarding procedures, identifying suppliers operating in higher-risk sectors or regions, and incorporating a contractual 'right of enquiry' into supplier agreements to enable modern slavery due diligence. These measures will be periodically reviewed for effectiveness and adjusted as necessary to ensure ongoing compliance and ethical business conduct.

Should we determine one of our suppliers may be engaging in Modern Slavery practices we will remove that supplier from our supply chain and, where appropriate refer the matter to the relevant authorities for further investigation.

### Training

Imagine will develop e-learning modules on the prevention of human trafficking and this training will be mandatory employees of dnata Australia who are customer facing.

### Effectiveness in combatting slavery risks

In order to assess the effectiveness of its actions, each year Imagine will evaluate the following:

Imagine will undertake a review of its existing supplier and contractor agreements as part of its commitment to compliance with the *Modern Slavery Act*. Following this review, Imagine will develop and implement a Modern Slavery clause or schedule to be incorporated into its contractual documentation. All current and future suppliers will be required to acknowledge and sign this document, confirming their commitment to identifying, preventing, and addressing modern slavery risks within their operations and supply chains, and to comply with all applicable obligations under the Modern Slavery Act.

### Further steps

Imagine is committed to continuous improvement to address the challenging and complex issue that is Modern Slavery.

Following our review of the effectiveness of the steps we have taken this financial year to ensure that there is no slavery or human trafficking in our business or supply chains, we intend to take the following further remedial steps to combat slavery and human trafficking in our operations and supply chains, namely:

Imagine will commence training for all relevant staff on modern slavery, including awareness of associated risks, reporting mechanisms, and compliance obligations under the *Modern Slavery Act*. This training will form part of the implementation of Imagine's updated modern slavery policies and procedures, ensuring that employees understand their responsibilities and are equipped to identify and respond to potential instances of modern slavery within IC's operations and supply chains.

This Statement has been approved by one or more resolutions of the board of directors, in their capacity as principal governing body of Imagine Cruising Pty Ltd ACN 614 987 718.

This Statement is signed by Robin Deller in his role as board member of Imagine Cruising Pty Ltd ACN 614 987 718.

Signature: 

Date: 23/09/2025

Robin Deller

CEO