

MODERN SLAVERY PRINCIPLES

1. INTRODUCTION

ADFA Jamison Pty Ltd acknowledges that all entities have a responsibility to respect human rights in their operations and supply chains and is committed to aiding a future where no-one is subject to modern day slavery and human trafficking. This document sets out the principles we aim to abide by in the operation of our business in order to do our part to combat modern slavery.

2. ADFA ENTITIES

These principles will apply to the following ADFA entities:

- ADFA Jamison Pty Ltd t/a Amora Hotel Jamison Sydney;
- Moxlis Pty Ltd t/a Amora Hotel Riverwalk Melbourne; and
- ADFA Jamison Brisbane Pty Ltd and Amora Hotel Brisbane Pty Ltd t/a Amora Hotel Brisbane

We believe that we have a moral and ethical obligation and responsibility to protect human rights. We will continue to be pro-active in our business activities, while aligning with our values of fairness, equality, diversity, respect and inclusion.

3. STRUCTURE AND OPERATIONS

ADFA and its associated entities own and operate the following hotels throughout Australia:

- Amora Hotel Jamison Sydney;
- Amora Hotel Riverwalk Melbourne; and
- Amora Hotel Brisbane.

Collectively, ADFA employs approximately 302 employees.

4. RISK OF MODERN SLAVERY PRACTICES

ADFA will make efforts to identify and address modern slavery practices in its operation and supply chains. We will also take steps to avoid the use of suppliers that have been identified as engaging in modern slavery practices.

The behaviours and practices which constitute modern slavery are serious human rights violations. Modern slavery practices include (but are not limited to) trafficking in persons, slavery, slavery-like practices (including forced labour) and the worst forms of child labour.



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The key modern slavery risk factors are as follows:

- **Vulnerable populations** – groups of people more likely to be exposed to harm, or unable to advocate for themselves in exploitative situations. The level of vulnerability and potential for exploitation are higher in contexts where base skill labour is relied upon;
- **High risk categories** – products and services regarded as having inherent modern slavery risks, including industries that rely heavily on low-skilled labour and/or involve dirty, dangerous and difficult work;
- **High risk geographies** – countries or regions which are known to have higher modern slavery risks including regions that are vulnerable to bribery and corruption or without strong labour laws;
- **High risk business models** – business models that rely on third parties for the provisions of services, which can include labour hire. Outsourcing reduces company visibility over third-party recruitment practices and workplace/labour conditions.

5. ASSESSING AND ADDRESSING RISKS

We will undertake a process of updating supplier contracts to ensure that our suppliers are obliged to inform us of any modern slavery risks in their supply chains. We will engage in ongoing consultation with our suppliers when new products are sourced or there are changes in the supply source of existing products. Any modern slavery practices that are identified in our operations and supply chains will be brought to the attention of the board.

We will undertake a review process of our existing policies and processes to ensure there is alignment with our position on modern slavery.

Date: 25 October 2021

