



**Toga Hotel Management  
Holdings Pty Ltd**  
ABN: 82 162 986 352

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## TFE Hotels Modern Slavery Statement 2022

### Introduction & Reporting Entities

This modern slavery statement is made by Toga Hotel Management Holdings Pty Limited ACN 162 986 352 (**Toga Hotel Management Holdings**), being the parent company of the TFE Hotels group of companies (**TFE Hotels**), pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**) for the financial year 1 July 2021 to 30 June 2022 (**reporting period**).

Toga Hotel Management Holdings is a reporting entity pursuant to section 5 of the Act. One company within TFE Hotels is Medina Property Services Pty Limited ACN 062 326 176, a wholly owned subsidiary of Toga Hotel Management Holdings. Pursuant to section 5 of the Act, Medina Property Services Pty Ltd is itself a reporting entity. Toga Hotel Management Holdings is submitting this statement pursuant to section 14 of the Act as a joint statement on behalf of both itself and Medina Property Services Pty Ltd.

The purpose of this statement is to outline TFE Hotels' approach to minimising the risk of modern slavery in our business operations and supply chains. This statement sets out the actions taken by TFE Hotels during the reporting period to reduce the risk of modern slavery practices in our business operations and supply chains, and outlines how TFE Hotels intends to continually improve its processes in future years.

TFE Hotels does not tolerate any form of modern slavery including human trafficking, slavery, servitude, forced or child labour, debt bondage, forced marriage or exploitation. TFE Hotels is committed to reducing the risks of modern slavery in our business operations and supply chains, and to responding to incidents if they occur.

TFE Hotels' response to modern slavery risk assessment and mitigation across our group of companies is managed by the TFE Hotels procurement leadership team, supported by the Group General Counsel, and is reported to the Executive Leadership Team and the Board.

### Our structure and operations

TFE Hotels is an international hotel group, headquartered in Australia, with operations in Australia, New Zealand and Europe (Germany, Denmark, and Austria).

TFE Hotels was formed in 2013 as a joint venture between Toga Pty Ltd and Singapore's Far East Orchard Limited, which is controlled by the privately owned Far East Organisation. TFE Hotels is now one of the largest hospitality management providers in Australia with almost 60 years of hotel ownership, management and development experience.

TFE Hotels comprises a range of entities which contributed to its annual consolidated revenue as at 30 June 2022. The key entities comprising TFE Hotels include:

- Toga Hotel Management Holdings Pty Limited ACN 162 986 352 – parent entity of TFE Hotels;
- Medina Property Services Pty Limited ACN 062 326 176 – hotel operating and employment entity;
- Value Lodging Pty Ltd ACN 112 089 782– hotel operating entity;
- Vibe Hotel Services Pty Ltd ACN 105 802 757– hotel operating entity;
- Toga Hospitality NZ Limited – hotel operating entity (Incorporated in New Zealand. Company ID: 2018057);
- Toga Danish Hotel Holdings Pty Limited (Incorporated in Denmark);
- Adina Germany Holding GmbH & Co. KG (Incorporated in Germany. Company ID: HRA 47604).



Adina

vibe HOTELS

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Collection  
by TFE hotels



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TFE Hotels operates 66 hotels across Australia, New Zealand and Europe, with 6 further hotels in its development pipeline. It has a portfolio of five established hotel brands - Adina, Vibe, Travelodge, Rendezvous, Quincy – as well as the Collection by TFE Hotels portfolio, as follows:

- Adina Apartment Hotels and Adina Serviced Apartments in 38 locations in Australia, New Zealand and Europe
- A by Adina in 2 locations in Australia
- Vibe Hotels in 9 locations in Australia
- Quincy Hotels in 1 location in Australia
- Travelodge Hotels in 8 locations in Australia and New Zealand
- Rendezvous Hotels in 4 locations in Australia
- Collection by TFE Hotels includes The Calile Hotel in Brisbane, Hotel Kurrajong in Canberra, The Savoy Hotel on Little Collins in Melbourne and The Hotel Britomart in Auckland

TFE Hotels employed 2,137 staff across its hotel and head office operations in Australia, New Zealand and Europe in a mix of permanent, temporary and casual roles as at 30 June 2022. TFE Hotels' team members are employed pursuant to applicable workplace and immigration laws.

## Our supply chains

TFE Hotels' business involves the following primary supply chains:

- Procurement of goods and services for hotels, including:
  - Housekeeping / cleaning providers
  - Laundry and linen providers
  - Food and produce providers including dry/ chilled/ frozen food distribution, fruit, vegetables and meat
  - Team member uniforms
  - Guest amenities including mini bar items
  - Alcohol providers
  - Security services
  - Waste removal services
- Corporate/business partners, including online travel agents, preferred accommodation partners and sponsorship arrangements
- Information technology infrastructure and services
- Professional services including legal, tax, accounting, audit and insurance providers
- Outsourced offshore services such as accounts payable, treasury, accounting support and IT support services



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## Modern slavery risks in our operations, supply chains and controlled subsidiaries

TFE Hotels continues to predominantly deal with Australian based suppliers, with the majority of our operations based in Australia. TFE Hotels' operations overseas, while growing, are in countries that are generally known to have low modern slavery risks with good employee working conditions, governance and rule of law including New Zealand, Germany, Denmark and Austria.

Notwithstanding the above, the hospitality industry has been identified as a high-risk industry due to the prevalence of migrant labour and labour hire agencies within its outsourced workforces, including housekeeping, maintenance and security. With the easing of COVID-19 restrictions, there has been an increase of migrant labour in Australia towards the end of the reporting period, and TFE Hotels' risk exposure to potential modern slavery practices within its supply chain has increased as a result.

TFE Hotels also outsources certain components of its operations offshore to India, including accounts payable, treasury, accounting support and IT support, which is acknowledged by the Global Slavery Index to be a high-risk jurisdiction for modern slavery. However, we believe our mitigation processes set out in this statement combat this risk.

TFE Hotels has again reviewed its operations and supply chains in the reporting period to reassess areas of modern slavery risks. From this assessment, the following areas in our operations and supply chains remain particularly at risk of modern slavery practices:

Area	Potential risks	Area	Potential risks
<b>Housekeeping / cleaning providers</b>	This category is outsourced and there are potential risks associated with: <ul style="list-style-type: none"> <li>Low skilled workers</li> <li>Temporary, casual and part-time workers</li> <li>Overseas student workers</li> </ul>	<b>Supply of uniforms</b>	We have identified potential risks associated with: <ul style="list-style-type: none"> <li>Overseas manufacturing in low-cost countries</li> <li>Non-ethical sourcing</li> <li>Child labour at the originating location</li> <li>Compliance with local labour laws</li> </ul>
<b>Distribution of consumable goods</b>	Most of these items are imported by the distributors we work with, and there are therefore potential risks associated with: <ul style="list-style-type: none"> <li>Child labour at the originating location</li> <li>Compliance with local labour laws</li> <li>Non-ethical sourcing</li> </ul>	<b>Dry/ Chilled/ Frozen Food distribution – Fruit &amp; Vegetables/Meat</b>	We have identified potential risks associated with: <ul style="list-style-type: none"> <li>Low skilled workers</li> <li>Temporary, casual and part-time workers</li> <li>Overseas student workers</li> </ul>
<b>Laundry &amp; linen providers</b>	We have identified potential risks associated with: <ul style="list-style-type: none"> <li>Low skilled workers</li> <li>Temporary, casual and part-time workers</li> <li>Non-ethical sourcing of linen</li> </ul>	<b>Outsourced offshore services</b>	For services outsourced to India, we have identified potential risks associated with: <ul style="list-style-type: none"> <li>Compliance with local labour laws</li> <li>Instances of forced labour</li> </ul>

## Actions taken to assess and address those modern slavery risks, including due diligence and remediation

TFE Hotels continues to require suppliers to:

- annually provide a **modern slavery statement** detailing the steps they have taken to minimise modern slavery practices within their own supply chains, including a COVID-19 response;
- adhere to **minimum supplier requirements** which include mandatory standards for corruption, bribery, health & safety, labour rights and conditions, anti-discrimination, treatment of workers and other areas relevant to addressing modern slavery; and
- obtain **independent certification** from an external auditor if they are located outside a country in which we operate and deemed high risk due to their location or products they supply.

TFE Hotels also continues to impose contractual obligations on its suppliers through our supplier agreements to:

- comply with the *Modern Slavery Act 2018* (Cth);
- take all reasonable steps to ensure that there is no modern slavery in its supply chain;
- maintain in place policies and procedures to meet its requirements under all applicable laws relating to anti-bribery, anti-corruption and modern slavery; and
- maintain a complete set of records to trace the supply chain of all goods and services provided by the supplier and its subcontractors to TFE Hotels, which can be inspected and audited by TFE Hotels in certain circumstances.

During this reporting period, we were pleased to note that all identified suppliers at risk of modern slavery practices have submitted modern slavery statements in accordance with our requirements. Following a review of the statements, we have not identified any modern slavery practices in our supply chain.

Finally, TFE Hotels continues to have in place various policies that address various areas associated with modern slavery practices and risks:

- **Code of Business Conduct and Ethics**
- **Whistleblowing Policy**
  - supports and reflects TFE Hotels' values and code of conduct
  - sets out procedures and avenues available to report unethical, corrupt, illegal or otherwise inappropriate conduct, as well as potential breaches in relation to modern slavery
  - ensures disclosures of wrongdoing are dealt with appropriately and promptly
- **Procurement Policy**
  - requires team members making commercial commitments on TFE Hotels' behalf to:
    - seek to reduce the supply chain's adverse social and environmental impacts; and
    - take reasonable steps to ensure people in the supply chain are treated with respect, have adequate working conditions, and work in a safe and healthy environment
- **Contractors and Subcontractors Policy**
  - outlines policies regarding performance on human rights, health & safety and environmental issues when engaging contractors, and applies TFE Hotels policies to its contractors (including suppliers)

- requires all contractors and subcontractors to comply with applicable Australian and international laws regarding employment practices and benefits, anti-discrimination and work, health and safety
- requires contractors to ensure that they do not, and that their supply chain does not, engage in any 'modern slavery' practices including forced labour, exploitation, debt bondage and deceptive recruiting for labour or services
- **Work, Health and Safety Policy**
  - seeks to implement and maintain mandatory safe working conditions for all team members and contractors
- **Bullying, Discrimination and Harassment**
  - prohibits workplace bullying, harassment or discrimination in any form
- **Recruitment and Selection**
  - ensures TFE Hotels' recruitment and selection processes encourage equal employment opportunity and diversity
- **Anti-Corruption, Bribery and Political Donations Policy**
  - prohibits any activities associated with corruption or bribery, and setting clear criteria for permissible political donations

The commitments made in these policies apply to all employees of TFE Hotels.

## Assessing the effectiveness of our actions

In assessing the effectiveness of our actions, TFE Hotels monitors and reviews suppliers and contractors' compliance with various measures outlined in this statement, including the requirement to submit annual statements and certain contractual obligations as addressed above.

No instances of modern slavery have been identified in TFE Hotels' operations or supply chains to date.

The TFE Hotels procurement leadership team, supported by the Group General Counsel and Risk Manager, will continue to monitor, assess and improve our actions to address modern slavery risks and take necessary action in response to any incidents identified. Following the establishment of a formal risk management framework for monitoring and managing group risks, we will continue to focus on improving our processes, increase internal awareness of modern slavery risks and expand more broadly within our business the responsibilities and measures for addressing those risks.

## Our consultation process with subsidiaries in preparing this statement

TFE Hotels maintains one consistent leadership team across each of its subsidiaries, including the reporting entities listed above. There is, therefore, one management team responsible for coordinating TFE Hotels' response to modern slavery risks in its operations and supply chains. The preparation of this statement and all actions referred to in it have been managed by the TFE Hotels' procurement leadership team, supported by the Group General Counsel and Employment Counsel.



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## Approval

In accordance with section 14 of the Act, this statement was approved by the Board of Toga Hotel Management Holdings Pty Limited on 20 December 2022.

A handwritten signature in black ink, appearing to read "Allan Vidor", positioned above a horizontal line.

Allan Vidor AM, Chairman of TFE Hotels

Signed 20 December 2022



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