

The logo for Grand Hotel Group (GHG) consists of the letters "GHG" in white, sans-serif font, centered within a solid blue square.

Grand Hotel Group

A photograph of a modern building's entrance at night. The building features a prominent glass and metal facade with large columns and a wide overhang. The interior is brightly lit, and the exterior is illuminated by warm lights. The sky is a deep blue, and some trees are visible in the foreground.

**MODERN SLAVERY STATEMENT  
FINANCIAL YEAR 2022**

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This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) by Grand Hotel Trust (ABN 38 406 863 028) and Grand Hotel Company Pty Ltd (ABN 51 073 486 003) for the financial year ending 30 June 2022.

Grand Hotel Trust and Grand Hotel Company Pty Ltd are a stapled group collectively known as “Grand Hotel Group”.

This statement covers the activities of Grand Hotel Group and their controlled entities.

This is Grand Hotel Group’s first modern slavery statement under the Modern Slavery Act 2018 (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

References in this statement to ‘GHG’, ‘we’, ‘our’ and ‘us’ are references to Grand Hotel Group.

## **About Us**

The Grand Hotel Group (GHG) entities are wholly-owned subsidiaries of Tuan Sing Holdings Limited (or the Group). Headquartered in Singapore, Tuan Sing Holdings Limited is a regional investment holding company with interests mainly in real estate development, real estate investment and hospitality. Over the years, the Group has developed a portfolio of strategically located real estate assets in Singapore and across the region and established a reputation for the delivery of good quality and iconic developments.

GHG owns two properties in Melbourne and Perth respectively. They are managed by Hyatt International and operating as the Grand Hyatt Melbourne Hotel and Hyatt Regency Perth Hotel. The group also owns the commercial real estate and car parks adjacent to these hotels which are leased to tenants.

## Reporting Entity Structure, Operations & Supply Chains

Controlled entity	Place of incorporation
Grand Hotel Management Pty Ltd	Australia
Grand Hotel Company Pty Ltd	Australia
GH Operations Pty Ltd	Australia
HR Operations Pty Ltd	Australia
Grand Hotel Trust	Australia
GHG Capital Pty Ltd	Australia

The total number of employees as at 31 December 2022 is 15 (excluding those employed under Hyatt Hotels for the hotels operations).

The registered office of the above entities is located at L7, 123 Collins St, Melbourne VIC 3000.

## Our Commitment

GHG is committed to ensuring that it understands the issues addressed by the Modern Slavery Act 2018. We believe that respecting human rights is inherent in its business operations and is embedded in our values, reflecting and shaping our behaviours and organisational culture.

We treat everyone fairly and consistently and create a workplace that is safe, ethical, open, transparent, and trusted. Any action taken to date or planned in the future will enhance our ability to address the risk of modern slavery or human trafficking in our operations and supply chain.

Accordingly, we commit to assessing and monitoring the risks of modern slavery in our business through our own supply chain and taking action to eliminate such practices in accordance with our principles and standards.

## **Understanding our Modern Slavery Risks**

### **Risk Management**

Risk management at GHG starts with our Board, who is responsible for monitoring the effectiveness of risk management, internal control and compliance processes, and ends with our employees and contractors, who are accountable for complying with our policies and procedures.

To support our approach to managing modern slavery risks at GHG, we have developed clear principles and expectations as set out below.

### **Our Modern Slavery Risks**

GHG procures all labour locally either directly or through approved Australian contractors. Our supply chain is from within Australia.

## **Our Principles**

GHG expects our employees and suppliers to support the ethical standards set out in this Statement.

### **Bribery and Corruption**

We shall never engage in acts of bribery and corruption and shall not falsify documents and records.

### **Integrity**

All employees are expected to uphold honesty and morality in the conduct of their work.

### **Labour Rights**

- Employment is freely chosen.
- Workers are not required to lodge deposits or their identity papers with us and are free to leave their employment at any time.
- Every employee is issued with a copy of The Fair Work Information Statement issued by the Australian Government's Fair Work Ombudsmen to ensure they know their rights and entitlements as an employee.

## **Freedom of association and the right to collective bargaining are respected**

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

## **Working Conditions**

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- We will ensure that personal protective equipment is available and workers are trained in its use.



## **Child Labour**

- GHG supports ILO Convention 138 with regard to the appropriate age of workers and will not work with suppliers who use child labour.
- Child labour refers to work that:
- Is mentally, physically, or morally harmful to children;
- Can negatively affect their mental, physical, or social development, and
- Interferes with their schooling: – by depriving them of the opportunity to attend school; – by obliging them to leave school prematurely; or – by requiring them to attempt to combine school attendance with excessively long and heavy work. In short: child labour is work that deprives children of their childhood, their potential and their dignity, and is harmful to their physical and mental development.

## **Harsh or Inhumane Treatment**

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## **Discrimination**

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **Living Wages**

- GHG has zero tolerance for non-compliance of the Fair Work Act and the National Employment Standards.
- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure or any deductions from wages not provided for by legislation shall not occur without the expressed permission of the worker concerned. All disciplinary measures should be recorded

## **Entitlement to Work and Immigration**

- Only workers with a legal right to work shall be employed or used by GHG.
- All workers, including employment agency staff will be validated by GHG for their legal right to work by reviewing original documentation.
- GHG have processes to enable adequate control over agencies with regard to the above points and related legislation.

## **Working Hours**

- Working hours will comply with the Fair Work Act.

### Major risk types in hotel industry

- Forced labour of employed staff either directly or indirectly
- Using the hotel premises for forced sexual exploitation of adults and children
- Products and services used by hotels produced by forced labour

### Major risk type in Commercial Properties

- Supply chain and contract services including cleaning services

### Hotel Ownership type

Both hotels are classified as Managed properties and theoretically reduces the level of direct risk. However, the multinational has limited oversight over contracts which could lead to increased risk.

### Location

All properties are located within Australia which is a region which is not identified as being particularly vulnerable to modern slavery risk. Therefore, this reduces the overall risk factor.

### Policies & Procedures

Security procedures preclude guests from entering the lifts or hotel floors without a hotel room key. Security protocols reduce human trafficking risk.

Hyatt promotes an open-door policy to encourage the reporting of any violations of company policy, misconduct or mistreatment. Tuan Sing also has a Whistle-blowing policy in place to provide a way to anonymously and confidentially report activities that potentially may involve criminal, unethical or otherwise inappropriate behaviour in violation of applicable law and/or our established policies.

All Hyatt policies and procedure documents including those relevant to modern slavery are easily accessible via Hyatt Connect online tool available for all staff. Relevant policies include Hyatt Corporate Human Rights Statement, Hyatt Human Trafficking & Human Rights Statement, Hyatt Hotels Corporation Complaint & Investigation procedure for Accounting, Internal Accounting Controls, Fraud, Auditing Matters or Serious Law Matters.

### Policies & Procedures

Hotel contracted services contains a contractual obligation for the right to audit the contractor on wage compliance. The audit is scheduled and typically conducted on a bi-annual basis. Contracted services include reasonable cost based on time and are awarded on numerous ranked criteria and not limited to price.

All other Hotel contracts and Purchase Orders contain a clause requiring contracting parties to adhere to Hyatt's supplier code of conduct.

### Training

Annual “human trafficking” training is conducted for hotel staff in front office, housekeeping, in-room dining, Managers, leadership committee and security. Topics covered include how to spot the use of hotel as a venue for sexual exploitation or transit location for trafficking. The effectiveness of the training programs is measured using a quiz which must be passed at the end of the training.

The hotels support the reporting of forced sexual exploitation to Management who is responsible for reporting instances to the police.

Hyatt have signed ECPAT’s Code of Conduct to combat child sexual exploitation in the travel industry.

Hyatt is part of the International Tourism Partnership (ITP), an industry association that supports the principles outlined in the UN Declaration of Human Rights and the UNGPs.

Commercial Operations suppliers are sent modern slavery questionnaires and followed up with a phone discussion where responses are outside expectations.

### Assessment of Suppliers

GHG subscribes to the Property Council of Australia (PCA) Modern Slavery reporting platform to engage our suppliers this year. We incorporate data from the PCA supplier questionnaires into our risk assessment processes to help us understand risks associated with specific suppliers.

### Going Forward

Going forward GHG will continue to review and update the risk analyses with a focus on the areas of potential risk identified. GHG and Hyatt's policies will continue to be reviewed.

As we further develop our understanding of and approach to reducing the risks of modern slavery, we will expand our scope beyond our direct suppliers and begin exploring the risks of modern slavery further down our supply chain.



### Action Plan Effectiveness Assessment

GHG aim to have continuous engagement and awareness with our suppliers.

Whistleblowing statements will be regularly reviewed and annual training exercises with quiz assessments to be continued.

### Remediation

There have been no instances of modern slavery practices which are currently identified. Once GHG becomes aware of any potential instances, we will work together with the supplier to investigate and negotiate to remedy the situation. If negotiations are unsuccessful, we will report the situation to relevant authorities.

This statement has been approved by the Board of Grand Hotel Group on 16 December 2022.



William Liem  
Director

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