

Ascendas Hotel Investment Company Pty Limited
ACN 122 720 772
("Company")

Circulating Resolutions of the Directors

(passed in accordance with the Company's constitution)

We are Directors of the Company and we are entitled to vote on the resolutions set out below.


We confirm that we have reviewed the following documents:


- (a) draft Modern Slavery Policy, a copy of which is attached as Annexure A; and
- (b) draft Modern Slavery Statement for the Company (**Modern Slavery Statement**), a copy of which is attached as Annexure B.


It is resolved that:


- (a) the Modern Slavery Policy, in substantially the form attached as Annexure A, is approved;
- (b) the Modern Slavery Statement, in substantially the form attached as Annexure B, is approved, and that any director of the Company is authorised to execute the Modern Slavery Statement for and on behalf of the Company;
- (c) the Modern Slavery Statement be lodged with the Department of Home Affairs; and
- (d) any director or company secretary of the Company is severally authorised to execute any documents, and perform any other acts on behalf of the Company which are necessary or desirable to give effect to the above resolutions and to ensure compliance with the *Modern Slavery Act 2018* (Cth).

Signed as a correct record.

		15 May 2026

Dongliang LAI	Signature of Director	Date
		15 May 2026

Joo Ling Serena TEO	Signature of Director	Date
		15 May 2026

Kien TRAN	Signature of Director	Date
		15 May 2026

Clay Justin BENNETT-BREMNER	Signature of Director	Date

Annexure A – Modern Slavery Policy

Annexure B – Modern Slavery Statement

Modern Slavery Policy

1. Purpose

Ascendas Hotel Investment Company Pty Ltd ACN 122 720 772 (**Ascendas**) and its related entities and subsidiaries are committed to preventing the risk of modern slavery occurring within our operations and supply chain.

Throughout this Policy, Ascendas and related entities are collectively referred to as “we” or “our” or “us”.

This Policy accords with our values and core principles.

2. Scope

This Modern Slavery Policy (**Policy**) applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, suppliers, contractors, consultants, and any other third-party representatives.

We expect all who have or seek to have a business relationship with us to familiarise themselves with this Policy and to act in a way that is consistent with our values. We will only do business with organisations that fully comply with this Policy, or those that are taking verifiable steps towards compliance.

This Policy will be used to underpin and inform any Modern Slavery Statement that we are required to prepare to outline transparency in our operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

While our hotels are operated independently through a hotel management agreement with our managers, they are required to operate in full compliance with all applicable laws and regulations as part of our agreement with them. Our operation agreements mandate compliance with employment laws, and we communicate updates and provide training in accordance with these laws.

3. What is Modern Slavery?

Modern slavery is the term used to defined exploitative practices that violate human rights. Such practices include but are not limited to:

- slavery or slavery like practices; where ownership is exercised over an individual;
- servitude; obligation to provide services imposed by coercion, threat or deception;
- forced labour; work and service that is not voluntarily performed and obtained from an individual under coercion, threat or deception;
- human trafficking; arranging or facilitating travel of an individual for exploitation;
- debt bondage; an individual's services are pledged as security for a debt with the debt being manifestly excessive or services not being applied to liquidate the debt, or the length and nature of the services are not limited or defined;

- child labour and worst forms of child labour; work that is exploitative or is likely to be hazardous, harmful or interfere with a child's education, health (including mental health), physical wellbeing or social development including all forms of slavery and illicit activities;
- forced marriage; an individual enters into marriage without freely and fully consenting because of coercion, threat or deception, or being incapable of understanding the marriage;
- deceptive recruiting for labour or services; an individual is deceived about being exploited,

collectively, **Modern Slavery**.

The Modern Slavery Act provides for extended definitions of the terms including those set out in Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth), Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime dated 15 November 2000 ([2005] ATS 27, and Article 3 of the ILO Convention (No.182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour dated 17 June 1999 ([2007] AT 38).

4. Reporting obligations under the Modern Slavery Act

Section 16 of the Modern Slavery Act prescribes that entities report on the following non-exhaustive list:

- a description of the structure, operations, and supply chains;
- a description of the risks of Modern Slavery practices in the operations and supply chains;
- a description of actions taken to assess and address those risks, including due diligence and remediation processes;
- a description of how the effectiveness of such actions will be assessed;
- a description of the consultation process to have the statement approved by the Board of Directors and any entities that are owned or controlled;
- any other information that is considered relevant.

Our Modern Slavery Statement will be made publicly available through the Modern Slavery Statement Register administered by Australian Border Force.

5. Our approach to preventing Modern Slavery

We are committed to investigating and identifying Modern Slavery risks in our operations and supply chains, including through measures such as the provision of supplier due diligence questionnaires and pre-qualification questionnaires.

This is our first reporting period under the Modern Slavery Act and we expect that our approach to prevention will develop as our initiatives are further integrated. We are

committed to evolving, developing and updating our processes and procedures as more information becomes available to us.

5.1 Training and raising awareness

We will provide specific training to employees on Modern Slavery as we strive to raise awareness, identify and mitigate risks, promote ethical business practices, and foster a culture of social responsibility within all aspects of our business model.

5.2 Supply chains

- (a) We aim to:
 - (i) commence the process of conducting risk assessments to determine which parts of the business and which parts of our supply chains at a corporate level are at risk of perpetrating Modern Slavery, so efforts can be focused on areas most at risk;
 - (ii) encourage our hotels and facilitate their compliance and assessment of Modern Slavery risks by providing training and supplier questionnaires for their use to assist in ascertaining which suppliers may be at risk of perpetrating Modern Slavery;
- (b) Ascendas' hotels have their own independent supply chain and procurement processes in place, however, our expectation is for hotels to evaluate their relationships with suppliers to ensure compliance with modern slavery practices and laws of the country in which they operate to prevent risks;
- (c) Contractual documentation to which we are party, including supplier contracts, may incorporate specific prohibitions against Modern Slavery practices in line with this Policy including terminating any contractual arrangement with suppliers who are found to be in breach of this Policy. We aim to encourage our hotels to use reasonable endeavours in their supplier contracts to incorporate similar clauses in their supplier contracts.

5.3 Governance, policies and procedures

We aim to:

- (a) allocate Modern Slavery reporting responsibilities by involving existing teams within management, legal, risk, compliance, corporate social responsibility, procurement, human resources and finance to oversee Modern Slavery risks in operations and supply chains;
- (b) our hotel managers also have their own policies and procedures to address Modern Slavery risks in operations and supply chains;
- (c) implement monitoring of Modern Slavery compliance measures;
- (d) implement Modern Slavery incident reporting and monitoring processes (including mechanics to foster whistleblowing and reporting within the business); and
- (e) create a remediation framework to address the management of our suppliers, and our hotels' suppliers, who are identified as perpetrating, or are identified at high risk of perpetrating, Modern Slavery offences.

6. Responsibilities

The senior executive team will have primary day-to-day responsibility for the implementation of this Policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

7. Communication and training

Our senior executive team will ensure that employees receive adequate training on this Policy and any supporting processes applicable to their role and will also work with Ascendas' Operations Team to deliver communication and training on Modern Slavery to the hotel network.

8. Consequences of breaching this Policy

Where an employee is found to have engaged in behaviour that is in breach of this Policy, they will face disciplinary action which may include counselling for misconduct, a written warning, transfer or demotion and, in serious cases or cases of repeated behaviour, termination of employment.

In the case of breach of this Policy by third parties, contravention of this Policy may lead to intervention by us to produce an outcome that is appropriate to the facts and circumstances of the matter including the termination of their engagement with us.

9. Amendments to this Policy

We reserve the right to change this Policy at our discretion from time to time.

This Policy is not intended to create any contractually binding obligation on us and is not incorporated into any contract of employment or engagement or otherwise.

Modern Slavery Statement

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018 (Cth)* (**Modern Slavery Act**) by Ascendas Hotel Investment Company Pty Ltd ACN 122 720 772 (**Ascendas**).

Throughout this Statement, Ascendas and its subsidiaries and related entities are collectively referred to as “we” or “our” or “us”.

This is our first Statement, which outlines the steps we have taken to understand and address the modern slavery risks in our operations and global supply chain.

We are committed to assessing and eliminating the risks of modern slavery in our business operations and supply chains.

Structure, operations and supply chain

Structure

Ascendas is incorporated in Australia.

Ascendas is the owner of 3 hotels operated by third party management company known as Accor Australia and New Zealand Hospitality Pty Limited (**Accor Hotels**) and 1 hotel operated by third party management company known as Ascott International Management (Australia) Pty Ltd (**Ascott Hotel**) under multiple brands including Pullman, Mercure & Novotel which operate in the hospitality industry (**Hotels**).

Ascendas has an operating agreement in place with Accor Hotels and the Ascott Hotel to conduct all operational activities in each of the Hotels. Ascendas does not have direct input or control of the operations of each of the properties and pays a fee to Accor Hotels and the Ascott Hotel to conduct its operational activities on their behalf.

Operations

All employees engaged in the businesses operated by Accor Hotels and the Ascott Hotel are employed directly by Ascendas. As of 31 October 2025, there are a total of 649 employees employed by Ascendas. However, in line with the operating agreement between Ascendas, Accor Hotels and the Ascott Hotel, Ascendas does not have any direct control over the employment conditions or activities of these employees. The terms of employment of the employees in each of the 4 hotels are governed by the *Hospitality Industry (General) Award 2020 (HIGA)*. Ascendas requires Accor Hotels and Ascott Hotel to provide evidence of compliance with minimum terms and conditions of employment contained in the HIGA and other applicable workplace laws.

Contractors, labour hire or service providers that provide services to the Hotels are contracted directly by Accor Hotels and the Ascott Hotel.

Ascendas may from time to time employ persons under 18 years of age or any employees with visa arrangements.

Supply Chain

Procurement of types of goods such as property and facilities, food and beverages, or services such as cleaning etc. is done directly by Accor Hotels and the Ascott Hotel. The contracts for such goods and services are between Accor Hotels, the Ascott Hotel and the vendor. Ascendas does not play a

role in the selection of the supply chain in the Hotels. Ascendas otherwise only engages with suppliers at a corporate level and complies with relevant policies and procedures including the Supply Chain Code of Conduct and Modern Slavery Policy in engaging such suppliers.

The operating companies, being Accor Hotels and the Ascott Hotel, have in place its own Modern Slavery Statement and appropriate policies.

Our modern slavery risks

While this is our first Statement, we are committed to undertaking an assessment of modern slavery risks in our operations and supply chains in our Hotels to better understand the risks of causing, contributing, or directly linked to, modern slavery.

We will use a number of factors to assess the potential risk of modern slavery in our supply chains including geographic risks from where we source products, the products and services we source, the sectors we operate in, and the supply chain model involved.

We recognise that the hospitality industry generally has the following vulnerabilities:

- migrant workers in high risk or vulnerable populations, who may be subject to underpayment, excessive working hours and/or deceptive recruitment practices;
- use of contractors or service providers including labour hire and outsourcing or third-party contracting arrangements;
- use of overseas suppliers / vendors or suppliers which may operate in high-risk geographic areas; and
- increased global operations which create a risk relating to forced labour and modern slavery.

Actions taken to address modern slavery

Operations and Governance

We are committed to maintaining the highest levels of integrity and honesty throughout all aspects of our business, and we expect our business partners including suppliers and vendors to respect and adhere to such practices in the operation and management of their business.

The senior executive team has overarching responsibility for guiding and monitoring risks of modern slavery. It will also have oversight of sustainability and social impact practices, including corporate governance, such as in carrying out risk assessments and due diligence procedures which flow through our organisation and supply chains. This includes coordinating an annual risk control self-assessment which identifies regulatory and compliance risks, climate change and environmental risks (amongst others) and will include modern slavery risks moving forward.

Additionally, we have implemented various policies and procedures, including:

- **Modern Slavery Policy**

This policy outlines our approach to mitigating modern slavery practices including by requiring that all persons (such as employees, contractors, directors or those seeking to have business relationships including suppliers), identify risks within our operations and supply chains and take steps to address and/or remediate these.

- **Whistleblower Policy**

This policy is designed to promote and support a culture of honesty, integrity and ethical behaviour including by encouraging reporting of actual or suspected misconduct by eligible whistleblowers.

- **Supply Chain Code of Conduct**

This code sets out expectations of organisations in supply chains to comply with all applicable legal requirements and endeavour to implement appropriate measures to aid us in meeting principles of the code.

- **Codes of Conduct**

Our codes of conduct sets out our expectations of behaviour and conduct by our employees, officers, contractors and suppliers.

- **Workplace Bullying, Discrimination and Harassment Policy**

This policy and procedure includes our obligations in respect of bullying, harassment, discrimination, victimisation and vilification. It establishes procedures and processes for making complaints and applies to all employees, directors, officers, contractors, suppliers and visitors.

- **Workplace Health and Safety Policy**

This policy promotes the creation and maintenance of the highest standards of health and safety in the workplace and to promote a productive and enjoyable environment for all.

We are also subject to CapitaLand Investment Limited's policies and procedures including Environmental Health and Safety Policy and Grievance Handling Procedure.

Our Hotel manager (being Accor Hotels and the Ascott Hotel) also have in place their own policies and procedures to ensure appropriate workplace conduct and behaviours.

Supply chains

Our Hotel manager (being Accor Hotels and the Ascott Hotel) have in place their own processes and procedures to engage suppliers. Our expectation of Accor Hotels and the Ascott Hotel is that such processes and procedures comply with modern slavery practices and applicable laws.

Any suppliers engaged by Ascendas at a corporate level (of which there are limited suppliers) is done so in accordance with relevant policies and procedures including the Supply Chain Code of Conduct and Modern Slavery Policy.

Assessing the effectiveness of our actions

As this is our first Statement, moving forward we will monitor the effectiveness of our governance structure including by adopting further relevant policies and procedures to address modern slavery risks in our operations and supply chains.

We will assess the effectiveness of our actions by tracking our actions and outcomes, partnering with suppliers, providing training and support to our employees and undertaking internal governance processes. Based on the results of these processes we will adapt and strengthen our actions to improve our response to modern slavery.

The below sections chart a roadmap of actions moving forward.

Ascendas

Governance processes

As part of our roadmap for effective prevention of modern slavery in our operations, we anticipate establishing internal processes to regularly review and audit actions taken to address modern slavery risks including regular engagement and feedback within and between entities such as the legal, human resources and operations departments.

These internal processes include:

- establishing a compliance officer role with the purpose of assessing modern slavery risks which vests with the Hotel managers implementing practices to address any identified risks and encouraging disclosures;
- setting reporting timeframes and deadlines to monitor the implementation of such measures including key targets or performance indicators; and
- assessing the measures taken to mitigate, remediate or eliminate the risk or exposure to modern slavery practices and adapting such processes as applicable.

Suppliers

In respect of suppliers Ascendas engages with at a corporate level, we will:

- evaluate relationships on an ongoing basis including ensuring suppliers are engaged in a way that accords with the Supply Chain Code of Conduct and Modern Slavery Policy; and
- require any suppliers we directly engage with through contractual clauses to be compliant with modern slavery practices and laws of the country in which they operate to prevent risks.

Ascendas expects Accor Hotels and the Ascott Hotel to evaluate relationships with its suppliers to ensure compliance with modern slavery practices and laws of the country in which they operate to prevent risks.

Employees

Employees, contractors and other staff working directly for us or on our behalf will be provided with training and encouraged to report any suspected misconduct or breach of our Modern Slavery Policy or any other policies and procedures.

Hotels

Providing modern slavery training to our Hotels and information will go towards mitigating risks in circumstances where we have little visibility or oversight over their operations and supply chains.

Consultation

Ascendas consulted with other related entities and subsidiaries within the group of companies to prepare this Statement.

Whilst it does not control its Hotels, given they are separate legal entities, we endeavour to consult with our Hotels through written updates and by way of conference updates.

This Statement was approved by the Board of Directors of Ascendas Hotel Investment Company Pty Ltd on [insert date].

[insert name]

[insert role]

Ascendas Hotel Investment Company Pty Ltd