

**EP2 Management Pty Limited  
Modern Slavery Statement 2023**

## About this Statement

This Modern Slavery Statement (Statement) has been prepared in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (Act).

This is the first Modern Slavery Statement submitted by EP2 Management Pty Limited, trading as Hyatt Regency Sydney (EP2).

This Statement describes our approach and actions to manage Modern Slavery risks in our operations and supply chain during the financial year ended 31 December 2023 (Reporting Period), as well as our plans for future improvements.

We recognise that Modern Slavery may occur in many forms here in Australia such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. We further recognise our obligation to exercise our responsibility to help minimise Modern Slavery practices in Australia.

## About EP2 Management Pty Limited

### Aligned with Australian Modern Slavery Act 2018

EP2 is committed to introduce a well-defined Modern Slavery risk management process, ensuring a qualitative review of the potential Modern Slavery risk across its operations and supply chain. We have:

- Detailed assessment of our suppliers through a comprehensive risk assessment methodology that includes indicators that identify a potential Modern Slavery risk across our operations and supply chain, which are split across:
  - Geographic risks: regional and country risks
  - Category risk: products and services
  - Business model risk: type of business model
  - Salient risk: vulnerable populations
- Conducted a completeness check of all our policies, procedures, and guidelines to identify how these can be further strengthened to identify and eliminate Modern Slavery risks across the operations.
- Disclosed of specific Modern Slavery risks and the actions within our supply chain.
- Defined the effectiveness of our actions.

### Our operations

Hyatt Regency Sydney is operated by EP2 with a hotel management agreement in place with Hyatt of Australia Limited which is an affiliate of the Hyatt Hotels Corporation. The Hyatt Hotels Corporation is a multinational hospitality company that operates a portfolio of hotels, resorts, and residential and vacation ownership properties around the world. Hyatt operates under various brands, each catering to different market segments and traveller preferences.

### Our organisational structure

The Company's governance framework is aligned to Hyatt's overall governance framework that encompasses both global policies, as well as localised policies, procedures and guidelines that are tailored to meet the country-specific requirements. Hyatt Regency Sydney hotel employs 434 people as of 31 December 2023.

### Reporting entity

EP2 Management Pty Limited (ABN 25 149 908 289) trading as Hyatt Regency Sydney (EP2), which qualifies as a reporting entity under the Act for this reporting period.

### Our supply chain

For the Reporting Period, EP2's supply chain comprises of the following categories:

- Housekeeping / cleaning services
- Food;
- Beverage;
- Uniforms;
- Security services;
- Equipment and consumables; and
- Other professional services

During FY23, 99% of our suppliers were domestic and just 1% of them were located outside Australia.

## Risks of Modern Slavery in our operations and supply chains

We have conducted a comprehensive risk assessment of our operations and supply chains to identify areas which were more at risk of Modern Slavery practices for the Reporting Period.

## In our operations

All employees are employed in accordance with the applicable labour laws of Australia, including in respect of minimum wages, hours of work, leave entitlements and safe working conditions. The main categories of activities undertaken by our Sydney workforce includes front-office services, housekeeping, food and beverage/ restaurants, event planning and catering, and office support functions.

Overall, we identify a low risk of Modern Slavery in our operations.

## In our supply chain

In assessing the risk of Modern Slavery practices within our supply chain, several factors were considered, including:

- supplier importance,
- customer interaction/ impact,
- spend (leverage),
- risk to people/ salient risk,
- geographic impact,
- industry/ sector risk; and
- business model.

We have identified the following areas of potential Modern Slavery Risks:

- Housekeeping and cleaning services: low skilled workers, including casual, part-time and overseas student workers;
- Uniforms: low-cost and child labour overseas manufacturing;
- Food and beverages: low skilled workers, including casual, part-time and overseas student workers; and
- Other Commercial and Professional Services: low skilled workers, including casual, part-time, and overseas student workers.

Based on this assessment, we identified less than ten suppliers with medium risk of Modern Slavery in our supply chain.

# Actions to assess and address Modern Slavery risks

## Assessing our Modern Slavery risks

We have conducted our Modern Slavery risk assessment for the reporting period. We have analysed our supply chain data using a data analytics tool and performed a comprehensive review of our operations, including our policies and procedures. Additionally, we included interviews with key stakeholders.

No instances of Modern Slavery have been identified during the Reporting Period.

This is our first Australian Modern Slavery Statement. We are committed to continually improve our understanding of Modern Slavery risk exposure and will adapt our risk management approach, measurement of effectiveness, and actions accordingly.

## Actions to address Modern Slavery risks

EP2 has a strong focus on human trafficking and all processes, policies, guidelines and reporting mechanisms have been focussed on identifying these risks. However, during the operational reviews it became apparent that addressing Modern Slavery within EP2 requires a comprehensive approach that encompasses prevention, detection, response, and accountability. Here's a set of actions that have been highlighted to address Modern Slavery risks:

### Governance and policy

Hyatt has a comprehensive Code of Business Conduct and Ethics, guiding our people in acting ethically and follow the laws and requirements that apply where we do business. Hyatt has an established UK Modern Slavery and human trafficking statement, providing guidance in the steps that the organisation takes to combat Modern Slavery. We will continue to assess the relevance of those policies and procedures to ensure alignment with both Hyatt's standards and also with Australian legal regulations.

### Our people

EP2 employees are employed in accordance with applicable Australian labour laws, including in respect of minimum wages, working hours, leave entitlements and safe working conditions. As part of our assessment, we conducted further due diligence on recruitment verification practices. Based on the responses received, we identified an opportunity to strengthen the subcontractor recruitment process by incorporating Modern Slavery concepts and current Australian legislation.

### Our suppliers

EP2 will consider implementing a comprehensive supplier onboarding process that embraces Modern Slavery concepts. This could involve initially incorporating a Modern Slavery risk assessment for certain potential suppliers, with the aim of eventually extending it to all potential suppliers.

### Training and awareness

We understand the importance of promoting Modern Slavery awareness amongst our people and supply chain partners. Recognising and knowing how to report the signs of possible slavery is a critical component of prevention efforts. Accordingly, Hyatt maintains human trafficking training programs in 10 languages. Hyatt's human trafficking training continues to be a brand

standard for all Hyatt colleagues. This training is required of all new Hyatt colleagues and is also part of Hyatt's annual global compliance training.

As the current training has a focus on human trafficking, we are looking to extend the training to incorporate Modern Slavery as well.

## Approval

This Statement has been prepared in consultation with the management team of Hyatt Regency Sydney and approved by the Board of EP2.



**Jocelyn Kum**

Director

30 June 2024