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TFE hotels

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

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TFE Hotels Modern Slavery Statement 2026

ABOUT THIS STATEMENT

This Modern Slavery Statement is made on behalf of Toga Hotel Management Holdings Pty Limited ACN 162 986 352 (**Toga Hotel Management Holdings**), the parent company of the TFE Hotels group of companies (**TFE Hotels**) and supports the reporting requirements of the *Modern Slavery Act 2018* (Cth) (**Act**).

Toga Hotel Management Holdings is a reporting entity under the Act, along with Medina Property Services Pty Limited ACN 062 326 176, a wholly owned subsidiary of Toga Hotel Management Holdings. Toga Hotel Management Holdings has prepared this Statement as a joint statement on behalf of both itself and Medina Property Services Pty Ltd for the financial year 1 July 2025 to 30 June 2026 (**reporting period**).

This Statement:

(a) provides an overview of our policies, procedures, and initiatives aimed at reducing modern slavery risks in our business operations and supply chains during the reporting period, and

(b) highlights our commitment to continuous improvement in this critical area.

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. We recognise and acknowledge that the business decisions we make can impact the safety and livelihoods of people and communities not only in the locations where we operate but about across the world. 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.

ACKNOWLEDGEMENT OF COUNTRY

TFE Hotels acknowledges the Traditional Owners of the lands, waters and seas on which we operate and live, and we pay our respects to the Elders past and present.

We extend that respect to Indigenous people working with us, guests and business partners. This kinship speaks to the shared values and strength of the TFE Hotels group.

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OUR STRUCTURE AND OPERATIONS

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

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 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 2026. 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); and
- TFE UK Hotel Management Limited (Incorporated in the UK).

TFE Hotels operates [75] hotels across Australia, New Zealand, the UK and Europe. It has a portfolio of established hotel brands - Adina, Vibe, Travelodge, Rendezvous, Quincy – as well as the Collection by TFE Hotels portfolio, as follows:

Brands	Countries	Number of Hotels	Rooms
Adina Apartment Hotels & Adina Serviced Apartments	Australia, New Zealand, Austria, Denmark, Germany, Hungary and Switzerland	45	5,770
A by Adina	Australia and Austria	3	444
Vibe Hotels	Australia	10	1,622
Quincy Hotels	Australia	1	241
Travelodge Hotels	Australia and New Zealand	6	1,041
Rendezvous Hotels	Australia	5	1,017
Collection by TFE Hotels	Australia and New Zealand	5	775

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The table below sets out the profile of TFE Hotels' workforce across its hotel and head office operations in Australia, New Zealand, the UK and Europe as at 30 June 2026.

	Australia	**New Zealand**	**Europe**	**UK**
Full time	824	128	469	30
Part time	151	68	73	3
Casual	851	18	23	0
Total	1826	234	565	33

TFE Hotels' employees are employed pursuant to applicable workplace and immigration laws and are paid in line with or above the award that covers their industry or occupation and in accordance with Australia's minimum wage entitlements.

TFE Hotels' have systems and processes in place to monitor award agreements and classifications at the time of hire, supported by a software system to capture time and attendance data. We have processes in place to ensure that all team members hold working rights in Australia and comply with visa conditions (where required). We confirm right to work documents as part of our onboarding processes and use an independent checking system to check relevant employees' visas.

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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
  - Employee uniforms
  - Guest amenities including mini bar items
  - Alcohol providers
  - Security services
  - Waste removal services
- Procurement of FF&E for hotel development and refurbishment.
- 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

Due to our global footprint, TFE Hotels' supply chains source products and services across multiple borders and jurisdictions. This exposes our operations to both local and international modern slavery risks. For this reason, we seek to foster long term supplier relationships based on mutual trust and a shared commitment and respect for human rights obligations in our respective operations and supply chains.

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IDENTIFYING MODERN SLAVERY RISKS IN OUR OPERATIONS, SUPPLY CHAINS AND CONTROLLED ENTITIES

TFE Hotels' operations are in countries that are generally known to have low modern slavery risks with sound employee working conditions, governance and rule of law including Australia, New Zealand, Germany, Denmark, Austria, Switzerland, Hungary and the United Kingdom.

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.

TFE Hotels also outsources certain components of its operations offshore to India and Sri Lanka, including accounts payable, treasury, accounting support and IT support, which is acknowledged by the Global Slavery Index to be higher-risk jurisdictions 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
Housekeeping / cleaning providers	This category is outsourced and there are potential risks associated with: • Low skilled workers • Temporary, casual and part-time workers • Migrant workers • Overseas student workers • Undeclared labour • Underpayment • Deceptive recruitment practices • Excessive working hours
Distribution of consumable goods	Most of these items are imported by the distributors we work with, and there are therefore potential risks associated with: • Forced labour and child labour at the originating location • Compliance with local labour laws • Non-ethical sourcing • Exploitation of vulnerable workers

Area	Potential risks
Supply of uniforms	We have identified potential risks associated with: • Overseas manufacturing in low-cost countries • Non-ethical sourcing • Forced labour and child labour at the originating location • Compliance with local labour laws • Exploitation of vulnerable workers
Dry/ Chilled/ Frozen Food distribution – Fruit & Vegetables/Meat	We have identified potential risks associated with: • Low skilled workers • Temporary, casual and part-time workers • Migrant workers • Overseas student workers • Undeclared labour • Underpayment • Deceptive recruitment practices

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Laundry & linen providers	We have identified potential risks associated with: • Low skilled workers • Temporary, casual and part-time workers • Migrant workers • Overseas student workers • Undeclared labour • Underpayment • Deceptive recruitment practices • Excessive working hours • Non-ethical sourcing of linen
Waste removal	We have identified potential risks associated with: • Low skilled workers • Temporary, casual and part-time workers • Migrant workers • Overseas student workers • Undeclared labour • Underpayment • Deceptive recruitment practices • Excessive working hours
Security services	We have identified potential risks associated with: • Low skilled workers • Temporary, casual and part-time workers • Migrant workers • Overseas student workers • Undeclared labour • Underpayment • Deceptive recruitment practices

Outsourced offshore services	For services outsourced to India, we have identified potential risks associated with: • Compliance with local labour laws • Instances of forced labour • Exploitation of vulnerable workers • High risk jurisdictions
FF&E procurement	We have identified potential risks associated with: • Compliance with local labour laws • Instances of forced labour • Exploitation of vulnerable workers • High risk jurisdictions
Construction and refurbishments	We have identified potential risks associated with: • Low skilled workers • Temporary, casual and part-time workers • Migrant workers • Undeclared labour • Underpayment

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ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Governance

TFE Hotels has a robust corporate governance framework in place. The TFE Hotels' Board of Directors exercises its accountability for the overall risk management strategy and activities of the group through its oversight of the Audit and Risk Committee.

TFE Hotels is committed to high standards of conduct and ethical behaviour across all operations as set out in the TFE Hotels' Code of Conduct (**Our Code**).

Our Code:

(a) communicates the core expectations of all our employees in critical risk areas including in respect of our business practices and interactions with external partners,

(b) provides an ethical decision-making guide for our employees to apply sound judgment and principled practices to their daily work life decisions, and

(c) provides multiple avenues (including an anonymous mechanism) for employees to speak up safely, securely and with confidence that they will be protected and supported about concerns or instances of inappropriate or unethical conduct.

Similarly, our Whistleblowing Policy:

(a) supports and reflects our Code,

(b) 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, and

(c) ensures disclosures of wrongdoing are dealt with appropriately and promptly.

There have been no incidents or suspected concerns of modern slavery notified during the reporting period.

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GROUP POLICIES AND PROCEDURES

TFE Hotels maintains a continuous improvement approach to its policy and procedure framework, particularly in relation to aspects of our business operations exposed to potential modern slavery practices and risks:

- **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.
- **Safety & Wellbeing 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.

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DUE DILIGENCE AND REMEDIATION PROCESSES

TFE Hotels continues to require key suppliers to:

- annually provide a **modern slavery statement** detailing the steps they have taken to minimise modern slavery practices within their own supply chains;
- 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.

ONGOING ENGAGEMENT WITHIN OUR OPERATIONS

Throughout the reporting period, senior management actively engaged with business unit teams and team members to reinforce our commitment to identifying, mitigating, and addressing modern slavery risks within our business and supply chains. This engagement included:

- Selection of a new Governance, Risk & Compliance software platform to support enterprise risk management and compliance tracking
- Commencement of an internal policy governance framework review project, including refresh and relaunch of TFE's Anti-Corruption, Bribery and Political Donations Policy, Contractor and Subcontractor Policy, Environmental Social and Governance Policy, Procurement Policy and Supplier Code of Conduct.
- Updating of TFE's Code of Conduct
- Maintaining Quarterly Business Review meetings with TFE's top six housekeeping vendors and primary disposables and consumables vendor (led by TFE Procurement with standing Modern Slavery risk agenda item)
- Expanded Microsoft SharePoint intranet access to all global Team Members to improve access to policies and resources
- Continued engagement with relevant high-risk suppliers such as housekeeping and cleaning contractors

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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, Safety & Compliance function, will continue to monitor, assess and improve our actions to address modern slavery risks and take necessary action in response to any incidents identified. 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

TFE Hotels maintains a global 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 the actions referred to in it have been developed collaboratively by TFE Hotels' Procurement, Operations, People and Risk, Safety & Compliance teams, supported by the Group General Counsel.

OUR FUTURE PLANS

TFE Hotels' continues to evolve the approach to identification and mitigation of modern slavery risks relevant to our business operations.

We recognise that eliminating modern slavery practices in our industry is an ongoing long-term goal that requires a commitment to continuous improvement and a focus on implementing well considered effective priorities and plans.

Our evolving roadmap has identified the following priorities and initiatives for the financial year ended 30 June 2027:

Priority Area	Activities
Modern Slavery Risk Framework	Embed modern slavery risk mitigation processes within TFE's sustainability and corporate governance frameworks
Risk Assessment	Monitor external events / incidents for any modern slavery related developments associated with our industry or supply chain that may warrant a reassessment of our control framework

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Training	Complete implementation of Modern Slavery risk e-learning content for TFE leaders globally
Policy Governance Framework	Implement refreshed enterprise policies, and supporting SOP's where required.
Supplier Due Diligence	Consult with Housekeeping cleaning vendors to develop and implement a site-based verification process targeting modern slavery risk mitigation commitments.

APPROVAL

In accordance with section 14 of the Act, this Statement was approved by the Board of Toga Hotel Management Holdings Pty Limited on 29 October 2026.

Alan Tang

Director

Toga Hotel Management Holdings Pty Limited

Signed: 29 October 2026