



# Accor Policies 2024-2029



<b>TITLE:</b>	Code of Conduct		
<b>POLICY NUMBER:</b>	TC01		
<b>DEvised BY:</b>	Talent and Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## PURPOSE

In every workplace there are standards of behaviour required of workplace participants. The standards of behaviour required of us at Accor are outlined in our Code of Conduct. The Code of Conduct explains how we are expected to behave at work and in connection with Accor.

This Code of Conduct does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. However, a breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment, or the termination of an engagement for services.

## PRINCIPLES

### Who this Policy Applies To:

For the purpose of this policy, a 'workplace participant' is defined as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001, the Companies Act 1993 and the Companies Act 2015) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network. All of these individuals are required to adhere to the Code of Conduct and other policies in connection with their employment or engagement.

Notwithstanding the above this policy applies to an operation trading under an Accor brand, operating under a franchise arrangement, marketing services agreement or brand service agreement (**Accor franchise operation**) only where it has adopted this policy. *This policy has been provided to the Accor franchise operation as a representative policy for its consideration and it should review the suitability of this policy before deciding whether to adopt the policy, and if does adopt the policy, monitor and update the policy as appropriate.* Where an Accor franchise operation adopts this policy, a reference to workplace participant in this policy will be taken to include anyone employed or engaged by the Accor franchise operation, or anyone who performs work for, or principally for the benefit of, the Accor franchise operation.

It is every workplace participant's responsibility to familiarise themselves with the Code of Conduct and comply with it. If a workplace participant does not understand their obligations under the Code of Conduct, they must seek clarification from their manager.



## **OVERVIEW**

### **1.1 Honesty and Integrity**

Protecting the reputation and good standing of our brand has been a critical factor in our long-term success. Therefore, working with honesty and integrity is very important when a workplace participant is representing Accor.

To achieve this, as a workplace participant, you are required to:

- Be honest and open in everything you do for work purposes, and endeavour to do the right thing at all times;
- Act as a good role model and ensure your actions do not bring disrepute to Accor or yourself;
- Keep and when requested provide accurate, complete and true records;
- Avoid any actual or potential conflicts of interest, and declare any conflicts or potential conflicts which may arise; and
- Inform your manager if you make a mistake so we can work together to correct it.

### **1.2 Decency and Respect**

Good working relationships are built on decency and respect, it is important to remember to treat others this way at all times.

As a workplace participant, you are required to promote decency and respect by:

- Treating everyone with whom you come into contact with professionalism, with decency, and never unfairly, or with disrespect;
- Never bullying, harassing, victimising or discriminating against anyone;
- Respecting the customs, business practices and laws of the countries and regions in which we operate;
- Respecting the cultural differences and practices of the people you come into contact with; and
- Promoting equality within our business, and valuing and appreciating the diversity of our people, clients and guests.

### **1.3 Delivering Outstanding Customer Service**

Behaving in a professional manner and providing outstanding service are very important contributors to our image, continued success and overall reputation as a high-quality service provider.

As a workplace participant, you are required to provide outstanding customer service by:

- Making our guest and clients feel valued at all times;
- Only promising or doing what you are authorised to do within the agreed timeframe;
- Being fully committed to our team and the wider Accor team;
- Coming to work on time so you don't inconvenience others; and



- Dressing appropriately for your role (including wearing a uniform as required), presenting neatly and maintaining a high standard of professional grooming.

#### **1.4 Respecting the Law and Following Company Policies**

Accor is committed to complying with the laws, rules, regulations and policies in every location we operate in. This allows us to operate with the highest of standards.

To achieve this, as a workplace participant, you are required to:

- Make sure that you recognize and abide by the laws of the country in which you work, and/ or which apply within your scope of operations, and do not breach them - this extends to all of the regions Accor operates in;
- Comply with all Accor policies and procedures, as varied or replaced from time to time;
- Do what you are asked to do, as long as it is legal, reasonable and in the best interests of Accor;
- Inform your manager or an appropriate designated person if you know of any laws or Accor policies being broken by anyone, and make use of the applicable Accor Whistleblower Policy where necessary; and
- Never engage in any kind of illegal or unlawful activity.

#### **1.5 Workplace Health, Safety and Wellbeing**

Accor is committed to workplace health, safety and wellbeing. Our priority is to ensure so far as reasonably practicable that all of our people, regardless of where they work or what they do, return home safely and well at the end of every work day.

Maintaining workplace health, safety and wellbeing is an ongoing and shared duty between us all. As a workplace participant you are required to:

- Remember it is your responsibility to take care of your own health and safety and that of your colleagues, clients, guests and stakeholders;
- Follow and cooperate with all instructions, training, policies and procedures provided by Accor and its managers;
- Tell your manager about hazards which put people's health and safety at risk. Stop any work which appears to be unsafe;
- Report any incident to your manager that you become aware of, regardless of how minor or major it may seem, including near-miss incidents;
- Wear the footwear, clothing and personal protective equipment required for your job, without exception;
- Never come to work under the influence of alcohol or drugs. The responsible consumption of alcohol at work related social events, held on Accor worksites, is permitted only if pre-approved by the appropriate leader eg General Manager, Department Head and/or Executive Leader. Attendance at such events is voluntary and consumption of alcohol at such events is a matter of personal choice.
- Not smoke or vape (E-Cigarettes, Vaporizers or Tobacco products) in or near any Accor workplaces, unless it is a designated and authorised smoking area; and
- Never bring any dangerous or unauthorised equipment, items or weapons to an Accor workplace.



## **1.6 Conflicts of Interest**

Conflicts of interest arise when a personal interest or activity interferes, appears to interfere, or has the potential to interfere with work or decision making. The slightest appearance of a conflict may cause a workplace participant's integrity and that of Accor to be questioned.

As a workplace participant, you must avoid Conflicts of Interest by:

- Telling your manager about any situation which places you in a conflict of interest; which has the potential to do so; or which may be perceived as a conflict with your responsibilities;
- Gaining approval from your manager before you commence any work outside of Accor and never pursuing personal business in connection with your work with Accor;
- Never accepting or seeking any type of benefit/gift/service/favour from a third party in connection with your employment within the Accor Group, except in accordance with the Accor Gift Policy; and
- Only accepting entertainment where it is common business practice to do so. Always discuss this with your manager first.

## **1.7 Privacy and Confidentiality**

It is very important we protect and maintain privacy and confidentiality in everything we do. Workplace participants should treat private and confidential information in the manner they would like their own private information to be managed in other people's hands, and otherwise in accordance with the law, their contractual obligations and Accor policy.

As a workplace participant, you must protect privacy and confidentiality by:

- Respecting each other's privacy and never collecting, accessing or disclosing personal information unless specifically authorised to do so in writing by the person concerned, where it is permitted by law, or otherwise in accordance with Accor's Privacy Policy; and
- Never accessing or disclosing confidential information except as permitted under your contract of employment or terms of engagement.

## **1.8 Use of Company and Other Resources**

All workplace participants are required to use company and client resources appropriately and never for personal gain.

As a workplace participant, you must use company resources responsibly by:

- Using Accor resources and those of our clients appropriately and in the manner for which they are intended and never for personal reasons;
- Treating company and client resources with care and respect;
- Taking care to prevent loss, damage, misuse or theft of company and client assets; and
- Notifying your manager if you are aware of the misuse of company or client resources.

## **BREACHES OF THE CODE OF CONDUCT**

Breaches occur when a workplace participant fails to comply with the requirements of this policy;



- If a workplace participant helps someone to breach the Code of Conduct, they will also be in breach;
- Breaches will be addressed and dealt with in a timely and appropriate manner;
- Accor maintains a zero-tolerance approach to crime and corruption and, as a result, in some situations, it may be necessary to refer breaches to external agencies/bodies for investigation and resolution;
- Accor maintains a zero-tolerance approach to discrimination, bullying, victimisation, harassment and sexual harassment, and, as a result, in some situations, it may be necessary to refer breaches to external agencies/bodies for investigation and resolution;
- Workplace participants may be suspended from their duties pending the results of any investigation into an alleged breach of this Code of Conduct;
- Disciplinary action may occur up to and including termination of employment or engagement if this Code of Conduct is breached; and
- Some breaches may constitute illegal activity which may have consequences beyond termination of employment or engagement, including requiring notification to the police.

## **RELATED POLICIES**

The below is a list of additional policies that are related to the Code of Conduct. This list is not exhaustive and is subject to change;

- TC02 – Work Health and Safety Policy
- TC03 - Return to Work (Rehabilitation) Policy
- TC04 – Environmental Policy
- TC05 – Equal Employment Opportunity (EEO) Policy
- TC06 - Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy
- TC07 - Workplace Inclusion and Diversity Policy
- TC08 - Social Media Policy
- TC09 - Grievance Policy
- TC10 - Email and Internet Usage Policy
- TC11 – Whistleblower Policy (Australia)
- TC11 – Whistleblower Policy (New Zealand)
- Accor Ethics and Corporate Social Responsibility (CSR) Charter
- Accor Gift Policy
- Accor Privacy Policy

Workplace participants should also refer to and be guided by the terms of their employment agreement or contract for service, the employing/engaging entity's internal policies and procedures, and any applicable legislation in their jurisdiction. Where there is a conflict with this policy, those terms, policies, and laws shall override this policy.



### FOR MORE INFORMATION

If you do not understand any part of this Code of Conduct, it is important you ask your manager to explain it to you.

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President Talent & Culture - Pacific

I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



<b>TITLE:</b>	Work Health and Safety Policy		
<b>POLICY NUMBER:</b>	TC02		
<b>DEvised BY:</b>	Talent and Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## PURPOSE

This policy sets out Accor's commitment to persons at its workplace in respect of Work Health and Safety (WHS) and what it expects of workers in order to achieve this commitment and meet its legal obligations.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations.

A breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this policy applies to:

For the purpose of this policy, a 'workplace participant' is defined as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001, the Companies Act 1993 and the Companies Act 2015) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

Notwithstanding the above this policy applies to an operation trading under an Accor brand, operating under a franchise arrangement, marketing services agreement or brand service agreement (**Accor franchise operation**) only where it has adopted this policy. *This policy has been provided to the Accor franchise operation as a representative policy for its consideration and it should review the suitability of this policy before deciding whether to adopt the policy, and if does adopt the policy, monitor and update the policy as appropriate.* Where an Accor franchise operation adopts this policy, a reference to workplace participant in this policy will be taken to include anyone employed or engaged by the Accor franchise operation, or anyone who performs work for, or principally for the benefit of, the Accor franchise operation.

Complying with this policy, as it is amended or replaced from time to time, is a requirement of a workplace participant's employment or engagement. It is every workplace participant's responsibility to familiarise themselves with this policy.





## OVERVIEW

Accor aims so far as reasonably practicable:

- to ensure the health and safety of workplace participants while at work (this includes at any place where work is carried out, or is customarily carried out, and includes any place where the worker is likely to be while working, such as in a vehicle), including by providing so far as reasonably practicable a safe and healthy workplace (including provision, so far as reasonably practicable, of a safe work environment, safe systems of work, safe plant and structures, equipment and substances);
- to not put at risk the health and safety of any other person (such as guests) arising from work carried out as part of the conduct of Accor business operations;
- to ensure incident notification processes are established and first aid response can be facilitated and;
- to ensure workplace participants are have an opportunity to consult and provide feedback on Work Health and Safety matters

To achieve this, Accor will, so far as is reasonably practicable, strive to:

- Develop and implement a WHS Management System into business operations;
- Conduct WHS risk management activities (hazard identification, risk assessment, and risk controls) to eliminate or, where that is not possible, to minimise risks as far as reasonably practicable;
- Actively consult with workplace participants who are, or are likely to be affected by a WHS matter;
- Actively consult with and coordinate activities with any entity carrying out a business or undertaking who have health and safety duties in relation to the same matter (overlapping duties);
- Provide adequate information, instruction, training and supervision to allow work to be undertaken safely;
- Implement processes to receive, consider and respond in a timely way to information regarding WHS hazards, risks and incidents;
- Promote continuous improvement through monitoring and measurement of WHS performance (including conducting regular audits, collecting and analysing accurate injury and incident data);
- Make available WHS resources and processes to enable work to be undertaken safely and in compliance with applicable WHS legal obligations;
- Verify the provision and use of WHS resources and processes; and
- Integrate the management of WHS throughout Accor business operations.

Workplace participants have a responsibility to:

- Understand and comply with this policy;
- Comply with all other related policies and procedures of Accor that relate to work health and safety;
- Take reasonable care for their own health and safety and that their own acts or omissions do not adversely affect the health and safety of other persons at the



workplace (including guests), including ensuring that they immediately notify their manager of any incidents that occur or hazards observed;

- Comply, so far as the workplace participant is reasonably able, with any reasonable instruction that is given by Accor to allow compliance with its legislative WHS obligations.

Workplace participants who are officers must also comply with their legal obligations relating to work health and safety imposed by law.

Workplace participants should also refer to and be guided by the terms of their employment agreement or contract for service, the employing/engaging entity's internal policies and procedures, and any applicable legislation in their jurisdiction. Where there is a conflict with this policy, those terms, policies, and laws shall override this policy.

### **FOR MORE INFORMATION**

If you do not understand any part of this policy, it is important you ask your manager to explain it to you.

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President, Talent & Culture - Pacific

I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



<b>TITLE:</b>	Return to Work (Rehabilitation) Policy		
<b>POLICY NUMBER:</b>	TC03		
<b>DEVEISED BY:</b>	Talent and Culture		
<b>DATE EFFECTIVE:</b>	February 2021	<b>REVIEW DATE:</b>	February 2023

## PURPOSE

This Policy sets out Accor's commitment to team members at its workplace in respect of rehabilitation and what it expects of team members and managers in order to ensure this commitment is achieved and legislative obligations discharged.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. However, a breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this policy applies to:

This policy applies to all 'workplace participants'. A 'workplace participant' is defined, for the purposes of this policy, as anyone who is employed by AAPC Limited (or its related bodies corporate, as defined by the Corporations Act 2001) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

Complying with this policy, as it is amended or replaced from time to time, is a requirement of your employment or engagement. It is every workplace participant's responsibility to familiarise themselves with this policy.

## OVERVIEW

Accor believes that team members that have been injured at or through their work should be provided with the appropriate injury management (both medical treatment and work based rehabilitation) to improve the likelihood of achieving a full and sustainable recovery and return to work.

### Accor are committed to:

- Providing a safe and healthy working environment with the goal of preventing injury and illness;
- Early commencement of injury management to promote recovery and return to work, including the provision of adequate information to injured team members;
- Providing suitable work duties in line with medical restrictions, as a transitional arrangement to facilitate recovery and return to work;
- Cooperating with all relevant parties, including treatment providers and insurers/ Scheme Agents;



- Developing Return to Work Plans in consultation with relevant parties to outline the duties to be performed; and
- Ensuring that participating in a return to work plan will not disadvantage a team member.

Accor's responsibilities in assisting team members in their return to work after a work-related illness or injury, differ in each state and territory. Managers and team members should ensure they comply with these responsibilities.

As part of the injury management process, Accor may:

- Request a team member to sign an authority form, consenting to Accor obtaining (and sharing) injury management information from relevant parties;
- Seek to discuss with the team member their injury management and progress;
- Inform team members of their responsibilities and requirements of their return to work program where relevant;
- Seek to identify temporary work duties in line with current medical restrictions and propose future arrangements to the treating doctor;
- Seek to arrange return to work meetings with relevant parties;
- Require the team member to be examined by a medical practitioner/s nominated by Accor; and
- Utilise accredited rehabilitation providers as required, to assist in the rehabilitation of those team members who suffer a workplace injury or illness.

It is the responsibility of an injured workplace participant to fully cooperate with the rehabilitation efforts of the employer and Insurer/Scheme Agent/Authority.

This includes early reporting of the work-related illness or injury, and accepting and performing suitable duties (as offered by Accor) which are in accordance with medical restrictions.

### **FOR MORE INFORMATION**

If you do not understand any part of this policy, it is important you ask your manager to explain it to you.

Accor reserves the right to amend or replace this policy at any time.



Adrian Williams  
Chief Operating Officer - Pacific



Angela Howard  
Senior Vice President of Talent & Culture – Pacific



I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name:\_\_\_\_\_

Signature:\_\_\_\_\_ Date:\_\_\_\_\_



<b>TITLE:</b>	Environmental Policy		
<b>POLICY NUMBER:</b>	TC04		
<b>DEvised BY:</b>	Talent and Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## PURPOSE

This policy sets out Accor's commitment to sustainable development through environmentally responsible practices and management of our resources. This policy statement should be considered in conjunction with the Accor Ethics and Corporate Social Responsibility (CSR) Charter.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. To the extent that this policy describes benefits and entitlements for workplace participants over and above the legislative requirements of the relevant jurisdiction, these are discretionary in nature and are also not intended to be contractual.

A breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this Policy Applies To:

For the purpose of this policy, a 'workplace participant' is defined as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001, the Companies Act 1993 and the Companies Act 2015) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

Notwithstanding the above this policy applies to an operation trading under an Accor brand, operating under a franchise arrangement, marketing services agreement or brand service agreement (**Accor franchise operation**) only where it has adopted this policy. *This policy has been provided to the Accor franchise operation as a representative policy for its consideration and it should review the suitability of this policy before deciding whether to adopt the policy, and if does adopt the policy, monitor and update the policy as appropriate.* Where an Accor franchise operation adopts this policy, a reference to workplace participant in this policy will be taken to include anyone employed or engaged by the Accor franchise operation, or anyone who performs work for, or principally for the benefit of, the Accor franchise operation.



Complying with this policy, as it is amended or replaced from time to time, is a requirement of your employment or engagement. It is every workplace participant's responsibility to familiarise themselves with this policy.

## OVERVIEW

Accor recognises the importance to team members, clients, guests and the wider community of implementing responsible environmental practices at corporate and operational levels, covering our day to day activities and longer-term strategies.

Accor acknowledges that an environmentally responsible corporation contributes to sustainable development and will improve the overall management of our resources.

The Accor Ethics and CSR Charter, references the group-wide environmental footprint study on which the environmental strategy was built. This study clearly outlines the main environmental challenges that need addressing in both building and operating Hotels.

Accor will demonstrate our commitment by implementing various global sustainable development programs, with the objective of educating our team members and minimising our impact on the environment, by focusing on reducing consumption, preventing pollution, minimising waste, implementing re-use and recycling practices, raising guest and team member awareness, and engaging the communities in which the Hotels, Lounges, Offices and Business Units operate.

Accor will follow best practice guidelines to maximise compliance with applicable environmental legislation, and will equip all management and team members with the knowledge, skills and resources to meet our obligations.

Accor will endeavour to ensure that best practice sustainable development principles apply to all their workplaces, workplace participants, contractors and suppliers.

## RELATED POLICIES

The below is a list of additional policies that are related to the Environmental Policy. This list is not exhaustive and is subject to change;

- Accor Ethics and Corporate Social Responsibility (CSR) Charter

## FOR MORE INFORMATION

If you do not understand any part of this policy it is important you ask your manager to explain it to you.

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President Talent & Culture - Pacific



I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name:\_\_\_\_\_

Signature:\_\_\_\_\_ Date:\_\_\_\_\_





<b>TITLE:</b>	Equal Employment Opportunity (EEO) Policy		
<b>POLICY NUMBER:</b>	TC05		
<b>DEvised BY:</b>	Talent and Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## POLICY OVERVIEW

The Equal Employment Opportunity Policy supports Accor's global and local commitment to creating a workplace that is equal, fair and inclusive and builds a workforce that reflects the diversity of our communities.

This policy provides guidance for the development and implementation of relevant plans, programs and initiatives to recognise and promote equal employment opportunities and affirmative action across all work areas of the group.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. However, a breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this policy applies to:

For the purpose of this policy, a 'workplace participant' is defined as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001, the Companies Act 1993 and the Companies Act 2015) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

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It is every workplace participant's responsibility to familiarise themselves with this policy and comply with it. If a workplace participant does not understand their obligations under this policy, they must seek clarification from their manager.



## OVERVIEW

Accor aims to promote Equal Employment Opportunities and Affirmative Action within the workplace. Accor's objectives are to:

- create a working environment that is inclusive where all workplace participants are evaluated based on ability and skills and not irrelevant personal characteristics;
- create a working environment where all workplace participants, clients and guests are treated fairly and equitably and where inclusive behaviours are fostered;
- implement training so that all workplace participants are aware of their rights and responsibilities;
- provide a procedure to enquire into and address complaints;
- treat all complaints seriously in a sensitive, timely and as appropriate, confidential manner; and
- encourage workplace participants to report breaches of this policy without fear of victimisation.

### 1.1 Equal Employment Opportunities

#### a) What are Equal Employment Opportunities?

Equal Employment Opportunities (EEO) generally refers to the inclusive, equitable and fair treatment of all workplace participants to be evaluated based on merit, including skills, qualifications and experience, rather than because of a protected attribute or ground or assumptions based on that protected attribute or ground [in New Zealand they are referred to as prohibited grounds of discrimination] (**Prohibited Ground**). Prohibited Grounds are prescribed by law and differ between the States and Territories within Australia and New Zealand. A non-exhaustive list of some of the more common Prohibited Grounds appears below:

- Age;
- Race;
- Colour;
- Sex, which includes pregnancy, potential pregnancy and childbirth;
- Religious belief;
- Ethical belief;
- Political opinion;
- Ethnic or national origins;
- Medical record;
- Irrelevant criminal record;
- Marital status, relationship status, family status or domestic status;
- Disability (including physical, intellectual and psychiatric);
- Genetic disposition to a disability or behaviour that is a symptom or manifestation
- Impairment;
- Nationality;
- Sexual orientation, gender identity, intersex status;
- Employment status;
- Trade union membership or industrial activity;
- Family responsibilities;
- Gender; and
- Use of a carer, assistant, assistant animal or disability aid.

Further information can be found in the Workforce Inclusion and Diversity Policy TC07

Accor promotes and endeavors to maintain a workplace environment that is characterised by inclusive practices and behaviours, which are free from all forms of unlawful discrimination,



including as set out within the Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy (Primary Policy TC06).

It is unacceptable to treat any workplace participant less favourably and/or encourage or participate in treating workplace participants less favourably because of a Prohibited Ground..

It is also unlawful to engage in victimising behaviour in relation to EEO complaints, as well as a breach of Accor policy. Further information about victimisation can be found in the Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy (Primary Policy TC06).

## **1.2 Affirmative Action**

### **a) What is Affirmative Action?**

Affirmative action generally refers to the removal of obstacles in employment so that all workplace participants receive equal opportunities. Affirmative action also promotes workforce participant groups underrepresented in the workforce, including but not limited to:

- Gender parity;
- Aboriginal and/or Torres Strait Islander People, Maori & Pasifika People
- People whose first language is not English;
- Members of racial, ethnic and ethno-religious minority groups; and
- People with a barrier to full time work due to physical impairment or mental illness.

Each workplace participant will be evaluated based on merit, defined as, the best workplace participant for the position or training opportunity based on the requirements. All workplace participants will be required to take a positive approach, by promoting a Heartist culture of inclusiveness and acceptance within Accor.

## **REFERENCES**

### **a) Accor Pacific Office**

Contact SVP Talent & Culture, Pacific [Angela.Howard@accor.com](mailto:Angela.Howard@accor.com) for contact details of your Regional Talent & Culture Manager, Regional General Manager, Vice President of Operations and/or Senior Vice President of Hotels Operations.

### **b) Australian Human Rights Commission**

General enquiries: (02) 9284 9600  
Complaints Info line: 1300 656 419  
General enquiries and publications: 1300 369 711  
TTY: 1800 620 241  
Website: [www.humanrights.gov.au](http://www.humanrights.gov.au)

### **c) Australian Capital Territory Human Rights Office**

Telephone: (02) 6205 2222  
TTY: (02) 6205 1666  
Website: [www.hrc.act.gov.au/](http://www.hrc.act.gov.au/)



**d) New South Wales Anti-Discrimination Board**

General enquiry service: (02) 9268 5544  
Toll free: 1800 670 812  
TTY: (02) 9268 5522  
Website: [www.antidiscrimination.nsw.gov.au/](http://www.antidiscrimination.nsw.gov.au/)

**e) Northern Territory Anti-Discrimination Commission**

Toll free: 1800 813 846  
TTY: (08) 8999 1444  
Website: [www.adc.nt.gov.au/](http://www.adc.nt.gov.au/)

**f) Queensland Human Rights Commission**

Toll free: 1300 130 670  
TTY: 1300 130 680  
Website: [www.qhrc.qld.gov.au/](http://www.qhrc.qld.gov.au/)

**g) South Australia Office of the Equal Opportunity Commissioner**

Toll free: 1800 188 163  
TTY: 133 677 then asking for AGD on 1800 177 076  
Website: [www.equalopportunity.sa.gov.au/](http://www.equalopportunity.sa.gov.au/)

**h) Equal Opportunity Tasmania**

Free call: 1300 305 062  
TTY: 0409 401 083  
Website: [www.equalopportunity.tas.gov.au/discrimination](http://www.equalopportunity.tas.gov.au/discrimination)

**i) Victoria Equal Opportunity and Human Rights Commission**

Toll free: 1300 891 848  
TTY: 1300 555 727 then use 1300 292 153  
Website: [www.humanrights.vic.gov.au/](http://www.humanrights.vic.gov.au/)

**j) Western Australia Equal Opportunity Commission**

Toll free: 1800 198 149  
TTY: (08) 9216 3900  
Website: [www.wa.gov.au/organisation/equal-opportunity-commission](http://www.wa.gov.au/organisation/equal-opportunity-commission)

**k) New Zealand Human Rights Commission**

Toll free: 0800 496 877  
Website: <https://tikatangata.org.nz/>

**l) Fiji Human Rights and Anti-Discrimination Commission**

Phone: 330 8577  
Website: <https://www.fhradc.org.fj/>



**FOR MORE INFORMATION**

If you do not understand any part of this policy, it is important you ask your manager or to explain it to you.

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President of Talent & Culture – Pacific

I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name:\_\_\_\_\_

Signature:\_\_\_\_\_ Date:\_\_\_\_\_



<b>TITLE:</b>	Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy		
<b>POLICY NUMBER:</b>	TC06		
<b>DEvised BY:</b>	Talent & Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## PURPOSE

Accor endeavours to ensure that the working environment is free from discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation. Discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation in any form is unacceptable and will not be tolerated under any circumstances.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. However, a breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this Policy Applies To:

For the purpose of this policy, a 'workplace participant' is defined as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001, the Companies Act 1993 and the Companies Act 2015) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

Notwithstanding the above this policy applies to an operation trading under an Accor brand, operating under a franchise arrangement, marketing services agreement or brand service agreement (**Accor franchise operation**) only where it has adopted this policy. *This policy has been provided to the Accor franchise operation as a representative policy for its consideration and it should review the suitability of this policy before deciding whether to adopt the policy, and if does adopt the policy, monitor and update the policy as appropriate.* Where an Accor franchise operation adopts this policy, a reference to workplace participant in this policy will be taken to include anyone employed or engaged by the Accor franchise operation, or anyone who performs work for, or principally for the benefit of, the Accor franchise operation.

Complying with this policy, as it is amended or replaced from time to time, is a requirement of your employment or engagement. It is every workplace participant's responsibility to familiarise themselves with this policy. Accor is committed to educating and supporting all workplace participants on how to prevent, intervene early and respond to discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation to ensure it is eliminated from the workplace, and as such all workplace participants will be held to account under this policy, regardless of position.



This policy is not limited to the workplace or to work hours. This policy extends to all functions and places that are work-related. Workplace participants must comply with this policy at all work-related functions e.g. work lunches, conferences, team meetings, Christmas parties and client functions. Workplace participants must also comply with this policy when going to other locations in connection with work, for example, when visiting a client, customer or property and during work-related travel.

## **APPLICABLE LEGISLATION**

Discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation is governed by both federal and state / territory legislation in Australia.

The following laws (and associated regulations) operate at a federal level:

- *Australian Human Rights Commission Act 1986*
- *Fair Work Act 2009*
- *Age Discrimination Act 2004*
- *Racial Discrimination Act 1975*
- *Sex Discrimination Act 1984*
- *Disability Discrimination Act 1992*
- *Workplace Gender Equality Act 2012*
- *Workplace Equality (Gender Quality Standards) Instrument 2023*
- *Workplace Gender Equality (Matters in relation to Gender Equality Indicators) Instrument 2023*

The following principal laws (and associated regulations) operate at a state / territory level:

- Australian Capital Territory – *Discrimination Act 1991* and *Work Health and Safety Act 2011*
- New South Wales – *Anti-Discrimination Act 1977* and *Work Health and Safety Act 2011*
- Northern Territory – *Anti-Discrimination Act 1992* and *Work Health and Safety (National Uniform Legislation) Act 2011*
- Queensland – *Anti-Discrimination Act 1991* and *Work Health and Safety Act 2011*
- South Australia – *Equal Opportunity Act 1984* and *Work Health and Safety Act 2012*
- Tasmania – *Anti-Discrimination Act 1998* and *Work Health and Safety Act 2012*
- Victoria – *Equal Opportunity Act 2010* and *Occupational Health and Safety Act 2004*
- Western Australia – *Equal Opportunity Act 1984* and *Work Health and Safety Act 2020*

Discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation is governed by the following laws in New Zealand:

- *Employment Relations Act 2000*
- *Human Rights Act 1993*
- *Crimes Act 1961*



- *Harmful Digital Communications Act 2015*
- *Harassment Act 1997*
- *Health and Safety at Work Act 2015*

## **OVERVIEW**

Discrimination, harassment (including sexual and sex-based harassment), bullying, and victimisation are behaviours that are beneath the standards Accor expects from workplace participants and are at odds with our aim to create a safe, respectful, and inclusive working environment.

Accor expects that achieving the desired working environment is the shared responsibility of all workplace participants – to behave in a way that ensures the safety and wellbeing of others and is respectful and inclusive.

Accor aims to eliminate discrimination, harassment (including sexual and sex-based harassment), bullying, and victimisation in the workplace. Accor's objectives are to:

- Create a working environment that is free from discrimination, harassment (including sexual and sex-based harassment), bullying, and victimisation;
- Create a working environment where all workplace participants, clients and guests are treated with dignity, courtesy, and respect and where inclusive behaviours are fostered;
- Prioritise the safety and wellbeing of all workplace participants;
- Implement training so that all workplace participants are aware of their rights and responsibilities;
- Provide a procedure to enquire into and address complaints;
- Treat all complaints seriously in a sensitive, timely and as appropriate manner;
- Provide safe and effective responses for those impacted by discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation to ensure wellbeing so far as reasonably practicable;
- Encourage workplace participants to report breaches of this policy without fear of victimisation;
- Promote appropriate standards of behaviour at all times, including in the workplace, work activities outside the workplace and at work-sponsored social events.

## **ZERO TOLERANCE**

Accor has a 'zero tolerance' approach to discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation in the workplace.

As a result, Accor will seek to be proactive in eliminating these behaviours. Zero tolerance also means there will be action and consequences that are appropriate and proportionate considering the behaviour, and taking into account the wishes of the person subjected to the behaviour.

It is important to note that zero tolerance does not mean Accor responds in the same way to every incident.





## 1.1 Discrimination

### a) What is Discrimination?

Discrimination occurs when a person is treated less favourably because of a protected attribute or ground (**Prohibited Ground**). The Prohibited Grounds are set by law and differ between the States and the Territories within Australia and with New Zealand.

A non-exhaustive list of some of the more common Prohibited Grounds appears below:

- Age;
- Race;
- Colour;
- Sex, which includes pregnancy, potential pregnancy and childbirth;
- Religious belief;
- Ethical belief;
- Political opinion;
- Ethnic or national origins;
- Medical record;
- Irrelevant criminal record;
- Marital status, relationship status or domestic status;
- Disability (including physical, intellectual and psychiatric);
- Genetic disposition to a disability or behaviour that is a symptom or manifestation
- Impairment;
- Nationality;
- Sexual orientation, gender identity, intersex status;
- Employment status;
- Trade union membership or industrial activity;
- Family responsibilities;
- Gender; and
- Use of a carer, assistant, assistant animal or disability aid.

These Prohibited Grounds also apply whether the person has or had the attribute, or where the person is presumed to have the attribute or characteristic often imputed to a person with any of the attributes.

Discrimination can occur in one of two ways: direct or indirect discrimination.

**Direct discrimination** occurs when a person is treated less favourably than another person in the same or similar circumstances because of a Prohibited Ground.

**Indirect Discrimination** occurs when a condition, requirement or practice is imposed which appears to treat everyone the same but in fact disadvantages a person or persons on a Prohibited Ground. If the condition, requirement or practice that is imposed is unreasonable, 'indirect discrimination' may result.

### b) Circumstances where Discrimination can occur

Discrimination is unlawful under Australian State, Territory and Federal law and New Zealand law. Specifically, discrimination is unlawful in:



- All aspects of the employment relationship, including during the recruitment process, access to benefits, access to promotion opportunities, access to transfer or training, termination of employment;
- The provision of education/training;
- The provision of accommodation;
- The provision of goods, services and facilities; and
- Access to places and vehicles.

**c) Examples of Discrimination can involve, but are not limited to:**

- **Refusing to hire someone because they are over the age of 45.** This is direct discrimination on the grounds of age.
- **Only allowing full time team members to apply for a promotion.** This might disadvantage team members who are working part-time because of family responsibilities. If the requirement to work full-time in order to be considered for the promotion was not a reasonable condition, requirement or practice in these circumstances, it may be considered indirect discrimination on the basis of family responsibilities.
- **A requirement that all team members must speak, read and write English fluently.** This may be considered indirect discrimination on the grounds of race, because some jobs may only require a level of conversational English and team members from non-English speaking backgrounds may not be able to comply with this requirement.
- **A manager disciplining a team member in relation to not following a uniform standard where the team member has a medical condition that prevents them from wearing full uniform.** This may be considered both direct and indirect discrimination on the grounds of impairment or disability.

A person can unlawfully discriminate against another person even if they did not intend to do so, if they treat that person less favourably on a Prohibited Ground.

Subject to very limited exceptions, discrimination in employment or in the provision of goods and services is unlawful. Accor may be liable for unlawful discrimination in employment and in the provision of goods and services and so it expressly prohibits unlawful discrimination by workplace participants. Individual workplace participants can be liable for unlawful discrimination, and can be sued or prosecuted if they engage in it.

## **1.2 Harassment (including sexual and sex-based harassment)**

### **a) Drivers of harassment (including sexual and sex-based harassment)**

In many cases, harassment is about exerting power and position over others who are perceived to be, or are in fact, more vulnerable. This can even be the case between peers or co-workers. Other factors such as age, gender identity, sexual orientation, other cultural and linguistic diversity, and disability have also shown to increase the likelihood a person may experience harassment.



## **b) What is Harassment?**

Harassment is typically offensive, intimidating or humiliating behaviour. When it occurs on a Prohibited Ground, it may constitute discrimination. It may also constitute bullying. Some forms of harassment are made expressly unlawful under some laws relating to equal employment opportunity, including sexual (and sex-based) harassment.

Sexual harassment is a specific form of harassment which is itself unlawful. It occurs when a person makes an unwelcome sexual advance, unwelcome request for sexual favours, or engages in other unwelcome sexual behaviour such as unwelcome physical contact, comments of a sexual nature, the display of sexually explicit material, staring or leering. Sexual harassment does not have to be intentional to be unlawful. Sexual harassment is not behaviour which is based on mutual attraction, friendship and respect. If the interaction is consensual, welcome and reciprocated, it is not unlawful sexual harassment.

Sexual harassment can be a one off behaviour, a series or pattern of behaviours or the same behaviour repeated. Furthermore, a person does not have to say 'no' or 'stop' to the harasser for the behaviour to be unacceptable.

Sexual harassment can occur across various mediums, including face to face and over technology, including via social media, text or email. It can also manifest where the work environment is hostile on the ground of sex, because, for example, it tolerates or allows things like the displaying of pornographic or sexually obscene materials, sexual banter or offensive jokes and innuendo.

At a federal level in Australia, the *Sex Discrimination Act 1984* (Cth) also prohibits harassment of another person on the ground of sex if, as a result of the sex of the person harassed (or a characteristic that appertains to, or is generally imputed to, a person of that sex), the harasser engages in unwelcome conduct of a demeaning nature in relation to the person harassed (**sex-based harassment**). Sexist remarks are a potential example of sex-based harassment.

Further considerations in New Zealand sexual harassment behaviour has to also:

- contain an implied or overt promise or threat of preferential or detrimental treatment in relation to that person's employment; or
- have a detrimental effect on the employee's employment, performance, or job satisfaction either but its nature or through repetition.

## **c) Examples of Sexual Harassment**

Sexual harassment in the workplace can take various forms. It can involve, but is not limited to:

- Staring, leering or unwelcome touching;
- Suggestive comments or jokes;
- Sexually explicit pictures or posters;
- Unwanted invitations to go out on dates;
- Requests for sex;
- Intrusive questions about a person's private life or body;
- Unnecessary familiarity, such as deliberately brushing up against a person;



- Insults or taunts based on sex;
- Spreading rumours or gossip based on sex;
- Sexually explicit physical contact;
- Sexually explicit emails or SMS text messages;
- Sexually suggestive hand or body gestures; and
- Sexist remarks (which may also constitute sex-based harassment).

#### **d) Examples of criminal sexual harassment**

Some types of sexual harassment may also be offences under criminal law. This can involve, but is not limited to:

- Sexual touching, physical molestation or assault;
- Indecent exposure;
- Act of indecency;
- Intimidation and stalking;
- Filming a person's private parts;
- Procuring for prostitution;
- Possession of child abuse material; and
- Sexually explicit communication via telephone calls, text message, email, social media, direct message, etc.

The law prohibits sexual harassment (including sex-based harassment) against all genders.

Sexual harassment, including sex-based harassment, is unlawful. Accor may be liable for such conduct at work and so it expressly prohibits sexual (and sex-based) harassment in connection with work. In Australia workplace participants can also be liable for such conduct and may be sued personally or subject to criminal charges if they engage in sexual harassment. (including sex-based harassment).

## **1.4 Bullying**

### **a) What is Bullying?**

Bullying is repeated unreasonable behaviour towards a worker or a group of workers that creates a risk to health and safety. Unreasonable behaviour means behaviour that a reasonable person, having regard to all of the circumstances, would expect to victimise, humiliate, intimidate or threaten.

Bullying includes behaviour that intimidates, offends, degrades, victimises, undermines, threatens or humiliates a person. Bullying behaviour does not need to be based on a Protected Ground (but if it is, it may also amount to unlawful discrimination). A person can be bullied for any reason.

For conduct to amount to bullying, it must be repeated. A one-off incident is not bullying. There is no requirement that the person deliberately or intentionally bullies the person but intention may be relevant to assessing the severity of the conduct.



All genders can be the target of bullying behaviour or be the person engaging in bullying behaviour. Workplace bullying can occur between a worker and a manager or supervisor, or between co-workers.

#### **b) Circumstances where Bullying can occur**

Bullying in the workplace is unlawful. It presents a risk to the health and safety of workplace participants and other people in the workplace. Accor can be liable for bullying at work and so expressly prohibits bullying in connection with work. Individual workplace participants may also be personally liable and can face potential criminal charges if they engage in bullying. Bullying in breach of work health and safety laws can also give rise to a criminal offence.

#### **c) Examples of Bullying**

Bullying in the workplace can take various forms. It can involve, but is not limited to:

- Verbal abuse;
- Behaving aggressively;
- Teasing or practical jokes;
- Pressuring someone to behave inappropriately;
- Excluding or isolating people;
- Unreasonable work demands;
- Psychological harassment;
- Changing rosters deliberately to inconvenience someone; and
- Deliberately withholding important information.

Low-level workplace conflict is not likely to be bullying. Equally, reasonable management action taken in a reasonable way will not constitute bullying. Reasonable management action may include, among other things:

- giving work directions and allocating work in accordance with business needs;
- counselling a workplace participant about their unsatisfactory work performance or conduct when undertaken in a reasonable manner;
- setting reasonable performance goals, standards and deadlines;
- rostering and allocating working hours where the requirements are reasonable; and
- implementing organisational changes or restructuring.

### **1.5 Reporting of Discrimination, Harassment and Bullying**

#### **a) Workplace participants' responsibilities (including managers and supervisors)**

Accor encourages workplace participants to speak up if they witness or are subject to workplace discrimination, harassment, sexual (or sex-based) harassment, bullying or victimisation. It is every workplace participant's responsibility to:

- Familiarise themselves with this policy and attend training in relation to the policy as required by Accor;



- Not encourage or participate in discrimination, harassment (including sexual and sex-based harassment) or bullying in the workplace, at work activities outside the workplace and at work-sponsored social events;
- Raise issues concerning discrimination, harassment (including sexual and sex-based harassment) or bullying in accordance with Accor's Grievance Policy;
- Maintain confidentiality, as appropriate, if they are involved in a complaint procedure. If a workplace participant breaches confidentiality, they may be subject to disciplinary action;
- Abide by this policy, as varied or replaced from time to time; and
- Follow any reasonable and lawful instructions of, and co-operate with, Accor to allow it to meet its obligations with respect to discrimination, harassment (including sexual and sex-based harassment) and bullying.

**b) What to do if you feel you are being discriminated against, harassed (including sexually and sex-based harassed) or bullied?**

As a workplace participant, if you feel comfortable, contact the person(s) subjecting you to the behaviour directly and ask them to stop that behaviour. This is not a compulsory step.

Alternatively, if you do not feel comfortable addressing the issue with the person(s) or if you have tried this and the behaviour continues, contact your line manager, Department Manager, General Manager or Talent & Culture representative.

If you are not comfortable contacting any of these people, contact your Regional Director of Talent & Culture, Regional General Manager, Vice President Operations and/or Senior Vice President of Hotel Operations.

If you wish to talk about what has happened with a professional counsellor, please contact our Employee Assistance Program (EAP).

TELLUS HEALTH on 1300 361 008 (AUS) or 0800 155 318 (NZ).

Workplace participants are able to access up to three one-hour sessions with EAP at no cost to them. Note that any discussion a workplace participant has with EAP is completely confidential and will not be divulged to their Hotel, Lounge, property or business unit.

At any time workplace participants can also contact their union representative.

**What happens when a complaint of Discrimination, Harassment (including sexual or sex-based harassment) or Bullying is reported?**

As a workplace participant, if you make a complaint relating to discrimination, harassment (including sexual or sex-based harassment) or bullying, your complaint will be dealt with in accordance with Accor's Grievance policy, as varied or replaced from time to time.

Accor encourages all workplace participants to raise issues the subject of this policy and will treat all complaints seriously.



If a workplace participant makes a false complaint in bad faith (i.e. making up a complaint to get someone else in trouble), that person may be disciplined. Such malicious complaints can also expose the complainant to a defamation claim.

**c) Liability for unlawful Discrimination, Harassment (including sexual and sex-based harassment) and Bullying**

Workplace participants should be aware that they can be held legally responsible for their own unlawful conduct. Workplace participants who aid, abet or encourage others to engage in unlawful conduct can also be liable for their conduct. Accor may also be liable for a workplace participant's behaviour if that behaviour constitutes unlawful discrimination, harassment or bullying.

**1.6 Victimisation**

Victimisation occurs where a person subjects or threatens to subject another person to any detriment, because, for example, they have complained about unlawful discrimination, harassment or bullying, have supported someone with an unlawful discrimination, harassment or bullying complaint, or they have acted as a witness in an unlawful discrimination, harassment or bullying complaint.

Victimising behaviour is unlawful under Australian State, Territory or Federal law and under New Zealand law and will not be tolerated under any circumstances. Examples of victimisation include taking the actions below against a person because they have lodged a complaint:

- Denying them a promotion; or
- Unreasonably refusing rostering requests; or
- Allocating them unreasonable tasks; or
- Excluding them from meetings they need to attend.

Any workplace participant who believes that they have been victimised as a consequence of making a complaint, may themselves make a complaint. The complaint will be dealt with in accordance with Accor's Grievance policy, as varied or replaced from time to time.

Accor will endeavour to ensure workplace participants are not treated less favourably at work because they have made a complaint.

**EVERYONE HAS A ROLE TO PLAY**

All workplace participants have a role to play in preventing and responding to discrimination, harassment (including sexual and sex-based harassment), bullying, and victimisation. Without exception, all workplace participants are expected to behave in ways that are safe, respectful, and inclusive.

Workplace participants who speak up about or report concerning behaviours they see or know of, make a valuable contribution to the health and safety of our workplace by supporting someone who may be subjected to the behaviour and preventing repeat behaviour.

There are specific expectations depending on a workplace participant's role (please note, the list below is intended as a guide and is not exhaustive):



- **Board / Executive**
  - Treat prevention and early intervention as a leadership priority;
  - Prioritise appropriate systems to support prevention and early intervention;
  - Require regular reporting of frequency and types of incidents;
  - Behave in a way that creates a safe, respectful and inclusive environment.
- **Leaders**
  - Speak up when you see, know of or anticipate concerning behaviours;
  - Create an environment that encourages teams to feel safe speaking up;
  - Report in accordance with Accor's Grievance Policy, as varied or replaced from time to time;
  - Behave in a way that creates a safe, respectful and inclusive environment.
- **Teams / Colleagues**
  - Speak up when you see, know of or anticipate concerning behaviours;
  - Report in accordance with this policy and Accor's Grievance Policy, as varied or replaced from time to time;
  - Participate in any inquiries or investigations about incidents;
  - Ensure the impacted workplace participant is safe and check in on them;
  - Behave in a way that creates a safe, respectful and inclusive environment.
- **Individual workplace participant**
  - Raise any incident that you are concerned about as per this policy and Accor's Grievance Policy, as varied or replaced from time to time;
  - Participate in any inquiries or investigations about incidents;
  - Behave in a way that creates a safe, respectful and inclusive environment.

### **WHAT SHOULD YOU DO IF YOU SEE / HEAR CONCERNING BEHAVIOURS AT WORK?**

Accor encourages bystanders to take action when they see or hear about concerning behaviours in the workplace.

Examples of a workplace participant who may be a bystander to discrimination, harassment (including sexual or sex-based harassment), bullying and victimisation may include:

- a workplace participant who witnesses another workplace participant making disparaging or offensive comments to another workplace participant;
- a workplace participant who witnesses an unsolicited or unwanted sexual advance made by a workplace participant to another workplace participant;
- a workplace participant that has identified a workplace process or policy that unreasonably discriminates against a particular sex or demographic of workplace participants;
- a workplace participant who hears the use of sexually inappropriate or discriminatory language at a work social event.

### **RELATED POLICIES/DOCUMENTS**

The below is a list of additional policies and documents that are related to the Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy. This list is not exhaustive and is subject to change;





- TC09 – Grievance Policy
- Grievance Escalation Process

**FOR MORE INFORMATION:**

If you do not understand any part of this policy it is important you ask your manager to explain it to you.

Workplace participants may of course, if they wish, seek help from an external body or authority who can provide information about options. Some organisations who can provide support, advice and information include:

- Australian Human Rights Commission
- Relevant State Equal Opportunity Commission
- Relevant State Workplace Health and Safety Body
- Fair Work Commission
- New Zealand Human Rights Commission
- New Zealand Citizen's Advice Bureau

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President of Talent & Culture, Pacific

I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



<b>TITLE:</b>	Workforce Inclusion and Diversity Policy		
<b>POLICY NUMBER:</b>	TC07		
<b>DEvised BY:</b>	Talent & Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## PURPOSE

The Workforce Inclusion and Diversity Policy supports Accor's local and global commitment towards creating a workplace that is fair and inclusive. As an organisation we strive towards building a workforce that reflects the diversity of our communities.

This policy provides guidance for the development and implementation of relevant plans, programs and initiatives to recognise and promote workforce diversity across all work areas of the group.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. To the extent that this policy describes benefits and entitlements for workplace participants over and above the legislative requirements of the relevant jurisdiction, these are discretionary in nature and are also not intended to be contractual.

A breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this Policy Applies To:

For the purpose of this policy, a 'workplace participant' is defined as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001, the Companies Act 1993 and the Companies Act 2015) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

Notwithstanding the above this policy applies to an operation trading under an Accor brand, operating under a franchise arrangement, marketing services agreement or brand service agreement (**Accor franchise operation**) only where it has adopted this policy. *This policy has been provided to the Accor franchise operation as a representative policy for its consideration and it should review the suitability of this policy before deciding whether to adopt the policy, and if does adopt the policy, monitor and update the policy as appropriate.* Where an Accor franchise operation adopts this policy, a reference to workplace participant in this policy will be taken to include anyone employed or engaged by the Accor franchise operation, or anyone who performs work for, or principally for the benefit of, the Accor franchise operation.



It is every workplace participant's responsibility to familiarise themselves with this policy and comply with it. If a workplace participant does not understand their obligations under this policy, they must seek clarification from their manager.

## OVERVIEW

Diversity in this context refers to the acceptance and inclusion of individuals regardless of their personal characteristics, and in particular, the acceptance and inclusion of groups of individuals that are underrepresented in our workforce.

Diversity also refers to the inclusive and equitable treatment of all workplace participants based on ability, skills, qualifications and experience, rather than because of a protected attribute or ground or assumptions based on that protected attribute or ground (**Prohibited Ground**). Prohibited Grounds are prescribed by law and differ between jurisdictions. A non-exhaustive list of some of the more common Prohibited Grounds appears below:

- Age;
- Race;
- Colour;
- Sex, which includes pregnancy, potential pregnancy and childbirth;
- Religious belief;
- Ethical belief;
- Political opinion;
- Ethnic or national origins;
- Medical record;
- Irrelevant criminal record;
- Marital status, relationship status or domestic status;
- Disability (including physical, intellectual and psychiatric);
- Genetic disposition to a disability or behaviour that is a symptom or manifestation
- Impairment;
- Nationality;
- Sexual orientation, gender identity, intersex status;
- Employment status;
- Trade union membership or industrial activity;
- Family responsibilities;
- Gender; and
- Use of a carer, assistant, assistant animal or disability aid.

### 1.1 Work Environment & Culture:

Accor endeavours to maintain a workplace culture that is characterised by inclusive practices and behaviours for the benefit of all workplace participants, guests and clients, and which promotes improved employment and career development opportunities for groups who are underrepresented in our workforce.

Accor respects people as individuals and values their differences. It strives to create a working environment that is safe, fair and flexible, promotes personal and professional growth, and benefits from the capabilities of its diverse workforce, one that reflects the guests we serve. Accor actively promotes inclusion and diversity through:

- Equal opportunities for employment, regardless of personal characteristics or attributes; and



- Improved employment and career development opportunities for groups of people within the workforce through specific programs and initiatives. For example, Accor currently promotes specific programs and initiatives under the following four pillars:
  - Multicultural including First Nations People and Indigenous People
  - Gender and sexual orientation
  - Ability and accessibility
  - LGBTQIA+ community

These four pillars are overseen by an Inclusion & Diversity Committee which is responsible for working with business units to highlight priorities and areas of focus for each pillar within each calendar year.

## **1.2 Responsibilities:**

- Each workplace participant has a responsibility to understand Accor's expectations, to foster and engage in behaviours consistent with this policy, and to support and respect equality, workplace diversity, workplace safety, and help to prevent unlawful discrimination and harassment in their workplace; and
- Each business unit is responsible for implementing, monitoring, and reporting on their achievement in the area of diversity to the Chair of the Inclusion & Diversity Committee, Senior Vice President Talent & Culture, Pacific, Regional Director Talent & Culture and/or Talent & Culture lead for their business unit.

## **RELATED POLICIES**

The below is a list of additional policies that are related to the Workforce Inclusion & Diversity Policy. This list is not exhaustive and is subject to change;

- TC01 - Code of Conduct
- TC06 - Discrimination, Harassment, Sexual Harassment, Bullying and Victimization Policy
- TC11 - Grievance Policy
- Grievance Escalation Process
- Recruitment Policy

Workplace participants should also refer to and be guided by the terms of their employment agreement or contract for service, the employing/engaging entity's internal policies and procedures, and any applicable legislation in their jurisdiction.

## **FOR MORE INFORMATION**

If you do not understand any part of this policy, it is important you ask your manager or to explain it to you.

*Accor reserves the right to amend or replace this policy at any time.*



Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President of Talent & Culture - Pacific

I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



<b>TITLE:</b>	Social Media Policy		
<b>POLICY NUMBER:</b>	TC08		
<b>DEvised BY:</b>	Talent & Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## PURPOSE

The purpose of this policy is to set out the standards for workplace participants to follow when engaging on Social Media, whether that Social Media is engaged in for private or professional purposes, during or outside work hours. This Policy also sets out requirements related to social media engagement and related information technology (**IT**) whether or not a workplace participant uses IT, resources, systems, computers/laptops or devices owned or issued by the Accor Group (**Accor**), an entity within the Accor network, or otherwise.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. However, a breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this Policy Applies To:

This policy applies to all 'workplace participants'. A 'workplace participant' is defined, for the purposes of this policy, as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001 (Cth), the Companies Act 2015 and the Companies Act 1993) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

Notwithstanding the above this policy applies to an operation trading under an Accor brand, operating under a franchise arrangement, marketing services agreement or brand service agreement (**Accor franchise operation**) only where it has adopted this policy. *This policy has been provided to the Accor franchise operation as a representative policy for its consideration and it should review the suitability of this policy before deciding whether to adopt the policy, and if does adopt the policy, monitor and update the policy as appropriate.* Where an Accor franchise operation adopts this policy, a reference to workplace participant in this policy will be taken to include anyone employed or engaged by the Accor franchise operation, or anyone who performs work for, or principally for the benefit of, the Accor franchise operation.

Complying with this policy, as it is amended or replaced from time to time, is a requirement of a workplace participant's employment or engagement. It is every workplace participant's responsibility to familiarise themselves with this policy.



## OVERVIEW

In this policy, 'Social Media' refers to forms of electronic or internet-based communication platforms. Accor recognises the online environment changes rapidly. However, for the purposes of this policy, examples of Social Media include, but are not restricted to, social networks sites (like Facebook, Instagram or LinkedIn), blogging sites (such as Twitter or TikTok), Instant Messaging/Chat (such as Snapchat, Be Real, blogs, forums, review websites, online encyclopaedias, wiki-sites etc.) through which users create or engage in online communities to share information, ideas, personal messages, and other content (such as pictures and/or videos), whether in a private or professional capacity.

The use of Social Media by workplace participants, for professional or private purposes, can have consequences and implications, including in connection with their employment or engagement.

Social Media activities of workplace participants could, for example, affect work performance, the work performance or psychosocial safety of other workplace participants, or the business interests and/or reputation of Accor or an entity within the Accor network. This could be the case whether the Social Media activities are engaged in inside or outside of the workplace or work hours and whether or not the workplace participant identifies themselves as a workplace participant employed or engaged by Accor or an entity within the Accor network.

Because of the potential consequences and implications, Accor has introduced some requirements relating to Social Media use by workplace participants, which are reflected in this policy.

## General matters

Workplace participants:

- are responsible for the content of their Social Media activity;
- must not state or imply on Social Media that they are authorised to speak on Accor's behalf or on behalf of an entity within the Accor network, unless officially appointed as a spokesperson for Accor or an entity within the Accor network;
- must not use their work email address on a personal Social Media account;
- must not post disparaging or defamatory content, including about Accor or another workplace participant, alumni, guest/patron, owner, or related 3<sup>rd</sup> party of Accor, or an entity within the Accor network;
- must only use Social Media in a manner which complies with their contract of employment or engagement, all applicable laws (including but not limited to laws relating to privacy, copyright and financial disclosure), and other Accor policies including the Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy; and
- must ensure that they do not engage in Social Media in a manner which is inconsistent or interferes with their duties, or their relationship with, Accor or an entity within the Accor network, or may damage Accor's business or reputation or the business or reputation of an entity within the Accor network.

## Restrictions on posting on travel-related review websites, forums or other Social Media websites



Workplace participants should not post any reviews on any travel-related review websites (such as but not limited to TripAdvisor and other similar online travel agents and travel service providers), forums, or social media websites, referring to any individual Accor properties or venues and any Accor brands including loyalty programs. Workplace participants should also not post malicious, libelous or unfounded reviews on any Accor competitors' facilities on Social Media.

Should a workplace participant have any issues with the service or product during a stay at an Accor property, they should contact their Talent and Culture representative, the Guest Relations Manager or General Manager directly to provide their feedback.

## **Requirements**

For any other activities performed on Social Media, workplace participants must follow the below requirements:

### **1. Be yourself:**

- Only spokespersons officially appointed by Accor may officially express views on behalf of Accor and its brands in the public domain. Workplace participants who are not officially appointed spokespersons must not state or imply that they are authorised to speak for Accor or its brands on its behalf on Social Media, and must not suggest that their views are shared by Accor or its brands.
- Establish that all opinions are their own and not that of Accor. Use "I think..." instead of "At Accor, we think..." Use a disclaimer like "The postings on this site are my own and do not necessarily represent the position, strategy or opinions of Accor and its brands".
- The use of a fake, anonymous or stolen identity is not acceptable (and may be a criminal offence). Remember that even so-called "anonymous" postings under a pseudonym can be traced back to the person and/or Accor. Workplace participants should only express a positive view in reference to their affiliation to Accor. When posting about the Accor Group or an entity within the Accor network e.g. LinkedIn post referring to a company event, or Facebook entry detailing work trip with colleagues, the values of the business should be reflected in the content.

### **2. Foster Accor values:**

- Discrimination, harassment (including sexual and sex-based harassment), bullying and victimisation by workplace participants on Social Media are beneath the standards Accor expects from workplace participants and a breach of its policies and the law. In some circumstances, such behaviour may also be a criminal offence.
- Always be respectful and considerate; ensure that comments are never impolite or inappropriate and never send any message or post any content that is offensive, defamatory, discriminatory, degrading, disrespectful, amoral or contrary to public order.
- Avoid all content that is racist, incites hatred or is strongly ideological, homophobic, pornographic, or encourages sexual tourism.
- Be careful when discussing controversial topics like politics and religion. Show respect for others' opinions. Remember as a global company, what a workplace participant says can be seen by guests, clients, and team members all over the world and something they say in one country might be inaccurate or offensive in another.





- Do not directly respond to an offensive or negative post by a guest or client; this is a no-win situation. Immediately alert the General Manager, Area General Manager, Vice President Operations and/or Senior Vice President of Hotel Operations of the hotel concerned.

### **3. Respect copyright:**

- Just because something is online does not mean it is fair game for copying (text, music, pictures, videos, etc.). It is the owner's choice to share their material with the world, not a workplace participant's. Before posting/sharing someone else's work, always check with them first and get written permission. Taking such steps to obtain the owner's permission will prevent any possible lawsuits against a workplace participant for unauthorised use of someone else's content and materials. For avoidance of doubt, this does not prevent a workplace participant from sharing articles on Social Media that are allowed to be shared by the websites of the newswires (for Example: Bloomberg, the BBC News, etc.).
- Do not use any logos or images trademarked by Accor unless it is part of the workplace participant's job.
- Do not use (by reproducing, copying, using, releasing, altering or adapting) logos, creations, videos, photographs, etc. belonging to others, without first obtaining prior authorisation (written consent) from the owner or holder of the intellectual property rights concerned. This includes anything taken from the Accor Intranet. If a workplace participant does not know the owner or holder of the intellectual property rights, they should take reasonable steps to find out, otherwise err on the side of caution and not use the content as its use could expose the workplace participant to lawsuits.
- Do not create an account or publish a social media page relating to Accor or its brands without prior approval from the Pacific Digital Department.
- If a workplace participant wishes to edit a social media page relating to Accor or its brands, they must consult their Marketing Manager and/or General Manager prior to obtain permission and advise the Pacific Digital Department of these changes.

### **4. Privacy matters:**

- Do not use or discuss any personal information regarding customers (including vendors, partners and hotel guests) or co-workers in the public sphere. Always take such discussions off-line. For avoidance of doubt, personal information includes, but is not limited to, personal details such as names, telephone numbers, addresses, credit card and bank account details etc.
- Accor does not want information shared that is not meant to be public, including its confidential information. Do not talk about financial information, strategies, forecasts, legal issues, developments, future promotional activities, sales trends, suppliers, partners, contracts, etc. on Social Media. All documents on the Accor Intranet, anything labelled "internal use only" and signed confidentiality agreements should also be kept strictly private. If a workplace participant has any doubts concerning the nature of the information involved, they should not disclose it but should first consult with their reporting manager to find out whether it can be posted/shared.



#### 5. Use common sense:

- Do not let social media affect job performance. Unless a workplace participant is an authorised Social Media manager of Accor, they should not engage in excessive use of social media while at work.
- Only publish information that is within the workplace participant's area of expertise.
- Remember, workplace participants are personally responsible for all the content and user-generated media they publish online.

#### BREACH OF POLICY

If a workplace participant does not comply with this policy (including as it is amended or replaced from time to time) they may face disciplinary action under Accor Performance Management process. This disciplinary action may involve, among other things, a verbal or written warning or, in serious cases, termination of employment or engagement.

This policy does not regulate all of the circumstances in which workplace participants may use or engage in Social Media. It is possible that a workplace participant may be subjected to disciplinary action (including up to termination of employment or engagement) for their conduct in the use of Social Media (including where that use occurred in their personal time), particularly if that use adversely affects or reflects on Accor or an entity within the Accor network or is unlawful.

#### FOR MORE INFORMATION

If a workplace participant does not understand any part of this policy it is important they ask their manager to explain it.

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President of Talent & Culture - Pacific

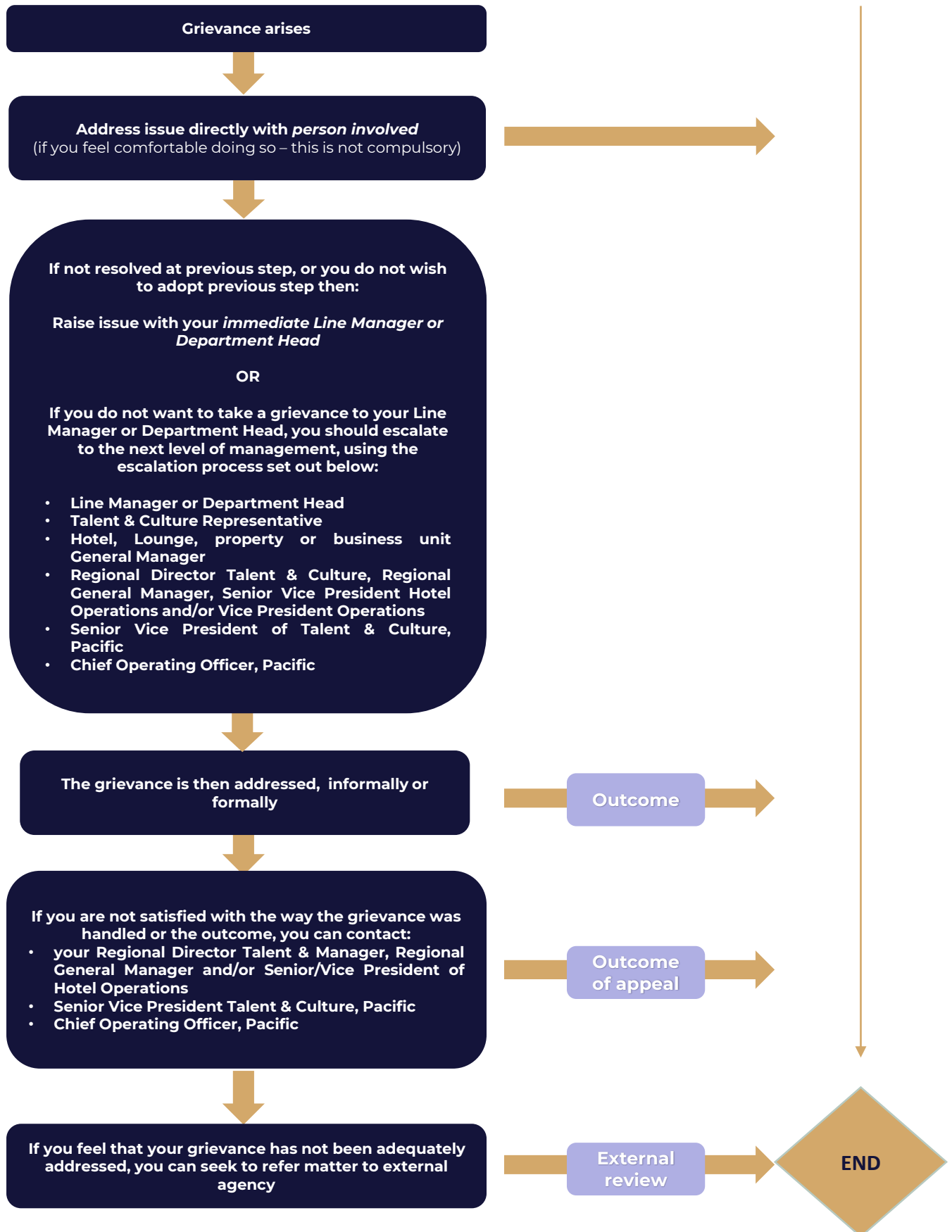
I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



## Grievance Escalation Process





<b>TITLE:</b>	Email & Internet Usage Policy		
<b>POLICY NUMBER:</b>	TC10		
<b>DEvised BY:</b>	Talent & Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Pacific		

## PURPOSE

Accor seeks to ensure that the highest standards of corporate governance and ethical conduct are maintained across of its operations. This policy sets out Accor's expectations of workplace participants to ensure appropriate use of and access to facilities for communication provided by Accor.

This policy does not, to the extent that it may impose obligations on any employing or engaging entity within the Accor network, form part of any workplace participant's contract of employment or engagement and is not intended to give rise to contractual obligations. However, a breach of a workplace participant's obligations under this policy may result in disciplinary action, including termination of employment or engagement.

## PRINCIPLES

### Who this Policy Applies To:

Throughout this policy there will be references to 'workplace participants'. For the purpose of this policy, a 'workplace participant' is defined as anyone who is employed by AAPC Limited (or its related bodies corporate or related company, as defined by the Corporations Act 2001, the Companies Act 1993 and the Companies Act 2015) or who performs work for, or principally for the benefit of, an establishment within the Accor network. This includes anyone employed or engaged by an owner of a property within the Accor network.

Notwithstanding the above this policy applies to an operation trading under an Accor brand, operating under a franchise arrangement, marketing services agreement or brand service agreement (**Accor franchise operation**) only where it has adopted this policy. *This policy has been provided to the Accor franchise operation as a representative policy for its consideration and it should review the suitability of this policy before deciding whether to adopt the policy, and if does adopt the policy, monitor and update the policy as appropriate.* Where an Accor franchise operation adopts this policy, a reference to workplace participant in this policy will be taken to include anyone employed or engaged by the Accor franchise operation, or anyone who performs work for, or principally for the benefit of, the Accor franchise operation.

Complying with this policy, as it is amended or replaced from time to time, is a requirement of a workplace participant's employment or engagement. It is every workplace participant's responsibility to familiarise themselves with this policy.



## OVERVIEW

### 1.1 The Facilities

Accor may give workplace participants access to telecommunications, e-mail, computer, internet and other facilities to allow them to communicate effectively with each other and external stakeholders (**Facilities**), and to use the information gathering and storage capabilities that the Facilities provide.

Workplace participants must understand that all Facilities provided, including but not limited to, emails and internet can and will be monitored for inappropriate use of the Facilities as outlined within this policy.

### 1.2 Unacceptable use

Accor may be both directly and vicariously liable for the inappropriate or unlawful actions of workplace participants with respect to the Facilities. Vicarious liability arises when an employer or principal is liable for the action(s) of workplace participants, which are committed within the course of, or scope of, their employment or engagement. In most cases, an employer or principal will not be vicariously liable if they can show that they took all reasonable steps to prevent the actions in question from occurring.

A workplace participant may also be directly liable under Australian Federal and State legislation or New Zealand legislation for their unlawful use of the Facilities including, but not limited to under the following Acts:

- i. New South Wales Anti-Discrimination Act 1977;
- ii. Australian Capital Territory Discrimination Act 1991;
- iii. Northern Territory Anti-Discrimination Act 1992;
- iv. Queensland Anti-Discrimination Act 1991;
- v. South Australia Equal Opportunity Act 1984;
- vi. Tasmania Anti-Discrimination Act 1998;
- vii. Victoria Equal Opportunity Act 2010;
- viii. Western Australia Equal Opportunity Act 1984;
- ix. Federal Sex Discrimination Act 1984;
- x. Federal Disability Discrimination Act 1992;
- xi. Federal Racial Discrimination Act 1975;
- xii. Federal Crimes Act 1900;
- xiii. Federal Copyright Act 1968;
- xiv. New Zealand Human Rights Act 1993;
- xv. New Zealand Crimes Act 1961;
- xvi. New Zealand Harmful Digital Communications Act 2015;
- xvii. New Zealand Copyright Act 1994; and
- xviii. Defamation Acts (as operating in various jurisdictions).

Workplace participants must not use the Facilities to:

- a) engage in any activity which is, or is likely to be considered unlawful, or inappropriate in the opinion of Accor;
- b) annoy, interfere with or disrupt the reasonable use of the Accor network by any other person;



- c) disclose the confidential information of Accor to external locations or recipients except as authorised by Accor; or
- d) gain unauthorised access to information or other computer networks.

### **1.3 Access, Storage and Distribution of Offensive Material**

Workplace participants must not draft, look up or distribute any material (not limited to but including e-mails, screensavers, and internet sites) which may be offensive to other persons.

This offensive material includes but is not limited to comments, opinions, jokes, pictures, videos, or executable files that may be sexual or pornographic in nature, racist, or otherwise of a discriminatory effect.

### **1.4 Defamation**

Defamation occurs when a publication is made by one person, which identifies or is capable of identifying another person, which injures the reputation of the other person (either by disparaging them, causing others to shun or avoid them, or subjecting them to hatred, ridicule or contempt). A publication may be achieved through many means, including through statements or communications on the internet or through email. Defamation can result in civil action under relevant legislation and may also constitute a criminal offence, and so workplace participants must not distribute defamatory or potentially defamatory comments by e-mail, social media websites, mailing lists and notice boards, or through their use of the Facilities in any way.

### **1.5 Copyright**

Copyright protects the exclusive right of the copyright holder to, amongst other things, reproduce, publish, perform, communicate to the public, copy and adapt copyrighted material.

Examples of possible breaches of copyright include forwarding e-mails or copying or downloading copyrighted material (including computer programs, screensavers, sounds and images that have copyright protection).

Workplace participants must respect the copyright and any other intellectual property rights of third parties. A workplace participant must not download material from the internet or otherwise receive and use copyrighted material that is owned by a third party (including via the Facilities) unless they have the written permission of that party.

Subject to applicable law, downloading from the internet for personal research is allowed but downloading material for distribution to others or for business use will require the permission of the third-party owner.

### **1.6 Discrimination, bullying and harassment**

Computer and internet usage has created a new avenue for unlawful discrimination, bullying and harassment including sexual harassment in the workplace.



Examples of Facilities related discrimination include the transmission of offensive, insulting and harassing e-mail messages, offensive screensavers or the accessing of sexually explicit websites through work computers.

Examples of unlawful discrimination, bullying and harassment may include, but are not limited to:

- a) When a workplace participant makes personally offensive or discriminatory comments using the Facilities, such as via e-mail, text messages or on social media;
- b) When a workplace participant repeatedly uses Facilities to tease a person, or make unreasonable, belittling or humiliating comments, or comments about their private life or sexual activities; and
- c) When a workplace participant uses Facilities to make persistent or unwelcome sexual or social invitations.

Workplace participants must not engage in unlawful discrimination, bullying or harassment when using the Facilities. Should they do so, they will be in breach not only of Accor policy but also may be the subject of legal claims personally.

## **EMAIL USAGE**

### **2.1 General**

Workplace participants should use email Facilities for “business purposes” which relate to Accor and the direct nature of Accor business.

Further, workplace participants must: -


- Ensure that email attachments greater than 1MB are “zipped” using approved licensed compression software if this results in a compression of greater than 40%;
- Delete email attachments and emails from unknown origins without opening them to view their contents;
- Virus check any email attachments from outside Accor prior to opening and advise Technical Assistance Centre by logging a ticket at <https://welcomenow.accor.com.au/> of any documents found to contain viruses. The person sending the infected file, should also be requested to install or update their virus checking software to prevent further contamination;
- Refrain from using email Facilities as a filing system. Any messages that need to be kept should be saved to a network directory, the appropriate location on Accornet, computer systems or printed. All old email messages should be deleted regularly;
- File or print copies of any relevant email messages to maintain the Accor filing and e-filing systems;
- Respond to any system support request to reduce the size of email files in a responsible manner; and
- Pass onto Technical Assistance Centre (TAC) all virus alerts they receive.

### **2.2 Content**

Workplace participants should exercise good judgement and common sense when creating and distributing email messages using the Facilities. Accor and/or individual workplace



participants may be liable for any defamatory or misleading or deceptive statements contained in email messages.

Workplace participants should check email addresses and spelling carefully prior to sending any email correspondence in particular when using auto-suggest email address (the button  on their toolbar). Workplace participants should use Distribution Lists (DL) responsibly. Where appropriate, use of exclusive lists is preferred to inclusive lists.

## **2.3 Signature**

All e-mail messages sent to external parties using the Facilities will have the following automatically appended by the e-mail system and may be amended at any time by Accor:

"This e-mail, any attachments and the information contained therein ("this message") are confidential and intended solely for the use of the addressee(s). If you have received this message in error please send it back to the sender and delete it. Unauthorized publication, use, dissemination or disclosure of this message, either in whole or in part is strictly prohibited."

Workplace participants can put an Accor logo, Accor website, ABN or ACN, environmental quotes in the signature as long as it is not considered as advertising. For example, workplace participants can mention "<http://www.all.accor.com>", but workplace participants cannot mention "Please visit <http://www.all.accor.com>" in the signature.

## **2.4 Accor Property**

Email is made available to workplace participants to enable Accor to conduct its business communications efficiently. All emails sent or received from Accor systems and the Facilities are the property of Accor.

Workplace participants should not expect that email is confidential. Emails sent and received from an Accor email address are Accor's property.

Accor retains the right to access or view workplace participants' emails. System administrators can read the contents of email sent and received by the corporate network, using the Facilities. The Vice President Information Technology - Pacific or their designate has access to workplace participants' mailboxes.

Accor does not log the content of emails; however, these emails may still be stored on mail servers. The Vice President Information Technology - Pacific or their designate may access workplace participants' emails and browsing logs when alerted to abnormalities to mail traffic patterns.

## **2.5 Personal Use**

Accor acknowledges that email Facilities may on occasion, be used for "personal use" but reserves the right to limit such use. If an email is personal, the workplace participant should make it clear that the message is not being sent on behalf of Accor.





This can be done by using a personal signature instead of company signature or by deleting the company signature. Workplace participants should consult the Information Technology department, Talent and Culture representative, Area General Manager and/or General Manager for the correct procedure to follow to set up their personal signature.

Personal use of emails must not interfere with the workplace participant's work performance, the work performance of any other workplace participant, and must not breach any other provision of this policy or any other Accor policy, including Accor's Social Media Policy.

Please note that any email sent via the Accor mail system is traceable back to Accor. Therefore, any personal messages sent must be of a nature that will not bring the reputation of Accor into disrepute or damage its business in any way.

## **2.6 Prohibited Use**

Email Facilities (including any personal email) cannot be used to:

- Send email messages (with or without attachments) which contain 'inappropriate material' which includes offensive material as defined in paragraph 1.3, as well as any material considered inappropriate or unlawful in accordance with paragraph 1.2;
- Distribute electronic chain letters, for example pyramid selling schemes of advertising;
- Send unauthorised email from another user's email address or impersonate another workplace participant;
- Send emails which are likely to be perceived as, or constitute bullying, discrimination, harassment, intimidation or an unwanted invasion of privacy;
- Send non-urgent or non-work related emails to large numbers of workplace participants (whether within Accor or not) at any time; and
- Send personal emails to any person who does not wish to receive it. If a recipient asks a workplace participant to stop sending him or her personal emails, the request must be observed.

## **2.7 Receipt of Offensive Email**

If a workplace participant receives offensive emails from outside Accor on the email Facility, the workplace participant should immediately delete it and notify their Manager, Department Manager, Talent and Culture representative, Area General Manager and/or General Manager. IT Technical Assistance Centre (TAC) can assist with setting up filters which may reduce the likelihood of receipt of this type of mail.

## **2.8 Discovery**

Workplace participants should be aware that e-mail, text message, or social media posts communications may be discoverable in legal proceedings in the same way as any other communication. This means that Accor may be required to disclose any applicable communication that is relevant to any particular litigation to other parties.



## **2.9 Email Etiquette**

Email messages sent outside Accor should observe the same conventions as any other correspondence. Where the message would be longer than two or three screens, the documents should be sent as an attachment with a covering note.

“CC” should only be used where those copied have a genuine need to be aware of the message or you believe the message is of significance to them.

## **FACILITIES USAGE POLICY - INTERNET**

### **3.1 Access to Sites**

Workplace participants should be aware that internet sites accessed by workplace participants via Facilities can record the Accor name. Accor can monitor sites that workplace participants are accessing and it reserves the right to do so.

Accor system administrators can monitor the date and time that websites were visited and the duration of site visits can be logged.

Workplace participants should therefore exercise discretion and only access sites relevant to the business of Accor.

Subject to applicable law, Accor reserves the right to cancel workplace participant's privileges or block access to sites which it deems to be inappropriate.

Accor reserves the right to publish figures which disclose how often a workplace participant has been using the internet to their manager or to those administering the system or managing the administrators.

### **3.2 Vending Information**

The internet is not a secure method of sending information. Therefore, when sending confidential information (for example business information, customer details, pricing, or any personal or private information about individuals), careful consideration should be given as to whether alternative means of communication are preferable.

Accor recognises the rise of internet-based generative AI applications, such as Chat GPT, as a business tool for maximising productivity and efficiency. While Accor recognises the beneficial uses of such applications, in no circumstances are workplace participants authorised to disclose any Accor confidential information into, or when using, those tools. Workplace participants are also prohibited from using or disclosing their work email or other work contact information on such tools.

## **FACILITIES USAGE POLICY – COMPUTER SOFTWARE, HARDWARE AND THE ACCOR NETWORK**

### Computer Equipment:

Workplace participants are given or have access to appropriate computer equipment to carry out Accor job responsibilities. Such equipment will at all times remain the property of Accor.



#### Passwords:

Workplace Participants should have their own computer accounts and password to login to the computer. The password must meet the Accor standard in length and complexity, and workplace participants cannot use the last 3 used passwords. Workplace participants should ensure that:

- They lock their PC whenever leaving a workstation unattended;
- Never use another person's account to connect to a computer or system;
- Should not attempt to gain access to another workplace participant's messages without permission;
- Never tell anybody their password; and
- Change their password regularly.

Workplace participants may be held responsible for any unauthorised access of the Accor network. Accor reserves and exercises the right to restore a workplace participant's password to a default value, to access the Facilities, if access to a workplace participant's files or workstation if required by an authorised person in their absence.

### **4.1 Software and Virus Protection**

The use of any unauthorised, unlicensed and/or illegal software is strictly prohibited.

Any information system leased by or under contract to Accor should be treated as an information system owned by Accor with respect to security considerations.

User software is subject to the terms and conditions of the relevant copyright or license agreement of the product. Unauthorised copying of software is prohibited.

Workplace participants may not make additional copies for concurrent use on additional computers unless explicitly permitted by the license.

Workplace participants cannot create backup copies in support of the original unless this is explicitly permitted by the license.

Software and documentation supplied with the personal computer (if this is applicable to some workplace participants) cannot be copied, loaned or given to any person other than the authorised users of that machine.

### **4.2 External drives or media**

Devices containing software from outside of Accor must not be used on Accor workstations (i.e. games, disk codes written on home personal computers or university, college or any outside institutions).

Any external device from which information is required or any program must be scanned before copying or reading any files from disks.



All external computer programs or documents must be virus checked prior to being installed or opened.

Accor workstations are equipped with anti-virus software. Such software should be used on a regular basis to ensure that viruses do not destroy vital information.

#### **4.3 Electronic Storage**

Network or local hard drives should generally only be used to store work related material although storage of minimal personal material is acceptable. The storage of inappropriate or unlawful material is strictly prohibited.

#### **BREACH OF POLICY:**

All workplace participants are required to comply with this policy at all times. If a workplace participant breaches this policy, they may be subject to disciplinary action, up to and including the termination of their employment or engagement.

#### **RELATED POLICIES**

The below is a list of additional policies that are related to the Email & Internet Usage Policy. This list is not exhaustive and is subject to change:

- TC06 - Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy
- TC08 – Social Media Policy

#### **FOR MORE INFORMATION:**

If you do not understand any part of this policy it is important you ask your manager to explain it to you.

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President of Talent & Culture – Pacific



I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name:\_\_\_\_\_

Signature:\_\_\_\_\_ Date:\_\_\_\_\_



<b>TITLE:</b>	Whistleblower Policy		
<b>POLICY NUMBER:</b>	TC11		
<b>DEvised BY:</b>	Talent & Culture		
<b>DATE EFFECTIVE:</b>	March 2024	<b>REVIEW DATE:</b>	March 2029
<b>REGION EFFECTIVE:</b>	Australia		

## PURPOSE

AAPC Limited and its related bodies corporate (as that term is defined in the *Corporations Act 2001* (Cth) (**Corporations Act**)) (**Accor**) are committed to the highest standards of conduct and ethical behaviour in all of their business activities, and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

Accor encourages the reporting and elimination of unethical, illegal, fraudulent or similar misconduct, and any otherwise improper state of affairs or circumstances, relating to it and its operations (**Accor Operations**). To that end, it has enacted this policy, which outlines the processes and safeguards in place for making whistleblower disclosures that are eligible for protection under the Corporations Act and the *Taxation Administration Act 1953* (Cth) (**Tax Administration Act**) (together, the **Whistleblower Laws**).

In the interests of clarity, the Accor Operations means:

- any businesses conducted by Accor within Australia (**Accor Australian Operations**), including:
  - Accor Pacific Office;
  - Accor Hotels;
  - Accor Apartments & Realty;
  - Qantas Lounges by Accor;
  - Accor Hospitality Services;
  - Accor Plus Offices; and

This policy does not apply to operations trading under an Accor brand and operating under a franchise arrangement, marketing services agreement or brand services agreement (**Accor Franchise Operations**). While Accor welcomes whistleblower reports relating to the Accor Franchise Operations, a person making a whistleblower report relating to the Accor Franchise Operations, will not have the protections available to whistleblower's under this policy. To obtain those protections, whistleblower reports should be made to the franchisee entity conducting the Accor Franchise Operations.

## PRINCIPLES

### Who this Policy applies to:

This policy applies to the following individuals within Accor Operations:

- current or former employees;



- current or former suppliers of goods and services (like contractors and their employees, and interns, secondees and volunteers);
- current or former directors and officers;
- current or former associates; and
- current or former spouses, dependants or relatives of any of the abovementioned individuals,

(collectively, **eligible persons**).

This policy will be made available to Accor's directors, officers and employees and others performing work for an entity involved in the conduct of the Accor Operations (**workplace participants**) via the Learn Your Way Online platform, MyAccor, Accor Vacation Club's Public Folders in Outlook and on staff notice boards located in workplaces across the Accor Operations. Otherwise, new directors, officers, employees and contractors performing work for, or providing goods and services to Accor Operations, will be provided with a copy of this policy as part of any induction.

## **REPORTABLE CONDUCT**

An eligible person may make a whistleblower report under this policy if they have reasonable grounds to suspect that the information they wish to report concerns misconduct, or an improper state of affairs or circumstances, in relation to an entity involved in the conduct of the Accor Operations, or a related body corporate, including involving its officers, managers or employees, and including any conduct that:

- breaches the Corporations Act;
- breaches other financial sector laws enforced by Australian Securities and Investment Commission (**ASIC**) or Australian Prudential Regulation Authority (**APRA**);
- constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- represents a danger to the public or the financial system; or
- concerns the tax affairs of the Accor Operations or an associate (as defined in section 318 of the *Income Tax Assessment Act 1936* (Cth)) of the Accor Operations for the purposes of the *Tax Administration Act* and relates to information which will assist the Commissioner of Taxation to perform their functions or duties under a taxation law in respect of the Accor Operations or an associate,

**(Reportable Conduct).**

Examples of Reportable Conduct may include conduct which:

- is dishonest, fraudulent, or corrupt, including bribery or other similar activity;
- involves an illegal activity;
- is unethical or in breach of Accor policies including the Accor Ethics and Corporate Social Responsibility Charter;
- amounts to an abuse of authority or position or power;
- may cause financial loss to an entity involved in the conduct of the Accor Operations, or damage its reputation, or otherwise be detrimental to its interests;
- involves unsafe work practices, or environmental damage; or



- involves the misuse of property, or other resources.

Reportable Conduct does not include a personal work-related grievance raised by an eligible person about a matter in relation to their current or former employment having, or tending to have, implications for them personally. The grievance will, however, not be an excluded personal work-related grievance and will be treated as Reportable Conduct, if the grievance:

- is about an actual or threatened detriment to the person, because the person has made, proposes to make, or could make, a whistleblower report; or
- raises concerns that are likely to have significant implications for Accor (or the Accor Operations) or another entity regulated by the Corporations Act, beyond the person who raised the grievance.

All excluded personal work-related grievances will be dealt with in accordance with other applicable Accor policies, as varied or replaced from time to time.

Examples of excluded personal work-related grievances include:

- An interpersonal conflict between employees;
- Dissatisfaction with a decision relating to employment, terms or conditions of employment, transfer or promotion; and
- Complaints about a decision to suspend, discipline or terminate employment.

### **Duties of eligible persons in relation to Reportable Conduct?**

Eligible persons who become aware of actual, or suspect on reasonable grounds, cases of Reportable Conduct, should not do nothing, but must make a report under this policy or under other applicable Accor policies.

## **REPORTING PROCESS**

Eligible persons may make a whistleblower report by phone, or in writing, including by email. If the whistleblower report is made in writing, the eligible person should mark the report “confidential” and include the words “Whistleblower Report” in the heading of the report.

Eligible persons may choose to make a whistleblower report anonymously. However, whistleblower reports made anonymously may limit Accor’s ability to make proper enquiries into the information contained in the report.

Accor strongly encourages eligible persons to make the whistleblower report to Accor’s Chief Whistleblower Officer, Angela Howard – Senior Vice President Talent & Culture, Pacific, by email at [angela.howard@accor.com](mailto:angela.howard@accor.com) or by phone on +61 (0) 416 084 435 (**Accor Chief Whistleblower Officer**).

However, eligible persons may also make a whistleblower report relating to an entity involved in the conduct of the Accor Operations to the whistleblower officer nominated for that entity to receive reports set out in the table below (**Accor Local Whistleblower Officers**).





Accor Operations	Accor Whistleblower Officers	Contact details
<b>Accor Hotels (including Apartments &amp; Realty)</b>	<b>For Australia, New Zealand &amp; Hawaii</b> Georgia Mayne Talent & Culture Executive, Pacific	<a href="mailto:Georgia.mayne@accor.com">Georgia.mayne@accor.com</a> +61 (0) 401 057 075
	<b>For New Zealand, Fiji &amp; French Polynesia</b> Joanne Craughwell Regional Director Talent & Culture New Zealand, Fiji & French Polynesia	<a href="mailto:Joanne.Craughwell@accor.com">Joanne.Craughwell@accor.com</a> +64 (0) 27 470 0097
<b>Accor Pacific Office</b>	Kate Bergin Talent & Culture Business Partner, Accor Pacific Corporate	<a href="mailto:Kate.Bergin@accor.com">Kate.Bergin@accor.com</a> +61 (0) 400 889 066
<b>Auckland Office</b>	Joanne Craughwell Regional Director Talent & Culture New Zealand, Fiji & French Polynesia	<a href="mailto:Joanne.Craughwell@accor.com">Joanne.Craughwell@accor.com</a> +64 (0) 27 470 0097
<b>Accor Plus</b>	Leanne Edwards Vice President of Talent & Culture, Accor Plus	<a href="mailto:Leanne.Edwards@accorplus.com">Leanne.Edwards@accorplus.com</a> +61 (0) 424 589 820
<b>Qantas Lounges by Accor</b>	Hannah Beeson Director of Talent & Culture, Qantas Lounges by Accor	<a href="mailto:Hannah.beeson@qantas.com.au">Hannah.beeson@qantas.com.au</a> +61(0) 411 845 618
<b>Any other operation of Accor</b>	Georgia Mayne Talent & Culture Executive, Pacific	<a href="mailto:Georgia.mayne@accor.com">Georgia.mayne@accor.com</a> +61 (0) 401 057 075

Even though eligible persons are encouraged to make reports under this policy in the above way, the Whistleblower Laws say that they can also make their report:

- internally to:



- an officer (such as company secretary or director) or a senior manager (being anyone who makes, or participates in making, decisions that affect the whole, or a substantive part of the business of the entity, or who has the capacity to affect significantly the entity's financial standing, which would generally include the Chief Operating Officer, Chief Financial Officer, Senior Vice President or a Vice President) of the Accor Operations where they perform work or provide goods or services, or of a related body corporate;
- externally to:
  - an auditor of an entity involved in the conduct of the Accor Operations (or a member of that audit team);
  - an actuary of an entity involved in the conduct of the Accor Operations;
  - ASIC;
  - APRA;
  - a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act;
  - in limited circumstances for a matter of public interest or an emergency (e.g. substantial and imminent danger to health or safety or to the natural environment), a journalist or a Member of Parliament (although it is recommended that eligible persons obtain legal advice if they are considering making a public interest or emergency report); or
  - in respect of matters relating to the *Taxation Administration Act*, a registered tax agent or a BAS agent who provides tax agent or BAS agent services to an entity involved in the conduct of the Accor Operations, an employee or officer of an entity involved in the conduct of the Accor Operations that has functions that relate to the tax affairs of the Accor Operations or the Commissioner of Taxation (where the information will assist the latter to perform their statutory duties or functions in relation to the Accor Operations entity or an associate).

All of the persons or entities above which are eligible to receive reports (including the Accor Chief Whistleblower Officer and Accor Local Whistleblower Officers) are described as **Eligible Whistleblower Recipients** for the purposes of this policy.

Despite being able to make a whistleblower report to any of those Eligible Whistleblower Recipients set out above, Accor strongly encourages eligible persons to make the whistleblower report to the Accor Chief Whistleblower Officer or one of the Accor Local Whistleblower Officers set out in the table above because those persons are appropriately qualified, trained and experienced in receiving and dealing with whistleblower reports under this policy.

### **What conditions are required to be satisfied to access the protections available to Whistleblowers under this Policy?**

There are special protections available to eligible persons who make whistleblower reports under this policy, if three conditions are satisfied. All of these conditions must be satisfied for the protections to be available. These conditions are set out in the table below.



	Conditions	Details
1.	<b>The discloser falls within a protected class of whistleblowers</b>	The discloser must be an eligible person, as defined in this policy.
2.	<b>The discloser makes the whistleblower report to an Eligible Whistleblower Recipient</b>	The discloser must make the whistleblower report to an Eligible Whistleblower Recipient, as defined in this policy.
3.	<b>The discloser must have reasonable grounds to suspect that the information contained in their report concerns Reportable Conduct</b>	<p>Reasonable grounds means that a reasonable person in the eligible person's position would also suspect the information concerns Reportable Conduct.</p> <p>The report must not be an excluded personal work-related grievance.</p>

### What protections are available to Whistleblowers under this Policy?

If all the conditions set out above are satisfied, the protections available to an eligible person are:

- the eligible person's identity is confidential, as is information likely to lead to the identification of the eligible person;
- the eligible person is immune from any civil, criminal or administrative legal action (including disciplinary action) for making the report;
- no contractual or other remedies may be enforced, and no contractual or other right may be exercised, against the eligible person for making the report;
- in some circumstances, the information contained in the report is not admissible against the eligible person in criminal proceedings, or in proceedings for the imposition of a penalty;
- anyone who causes or threatens to cause a detriment to the eligible person or any other person on the belief or suspicion that a whistleblower report has been made, or may have been made, proposes to, or could be made, may be guilty of an offence and may be liable for criminal prosecution or damages; and
- an eligible person's identity and information likely to lead to their identification, cannot be disclosed to a court or tribunal except where it is considered necessary by the court or tribunal to do so in the interests of justice, or where it is necessary to give effect to the whistleblower protections under the Corporations Act.

### How will the identity of Whistleblowers be protected?

If an eligible person is entitled to the protections set out above, their identity and other information which could identify them, will be dealt with confidentially. All files and records created relating to their report will be retained securely.



Their identity and information which could identify them will not be disclosed to anyone without their permission unless otherwise permitted by law (e.g. the Corporations Act permits the disclosure to a governmental authority (e.g. ASIC, APRA, the Australian Taxation Office (**ATO**), Federal or State police), or to a lawyer for the purposes of obtaining legal advice or representation).

On receipt of a report, if the report was made internally but not made anonymously, the Eligible Whistleblower Recipient who received the report, will endeavour to contact the eligible person as soon as practicable after receiving the whistleblower report. If the report was not made to the Accor Chief Whistleblower Officer, the Eligible Whistleblower Recipient will ask the eligible person's permission to share their identity with the Accor Chief Whistleblower Officer, on the basis that they agree to keep the eligible person's identity and other information which could identify them, confidential. Eligible persons will be asked to confirm their permission in writing. They may also be asked for additional information to assist with the review of the whistleblower report.

#### **How will Whistleblower reports be investigated?**

If the report is made internally, the Eligible Whistleblower Recipient to whom a report is made will review the report to determine whether the report falls within the scope of this policy and whether the information contained in the report should be investigated.

Unless the report was made anonymously, the eligible person will receive an acknowledgment of the report in writing and confirmation of whether the report falls within the scope of this policy.

They will also be informed about whether the information contained in the whistleblower report will be investigated and how that investigation will be conducted. Investigations may be conducted by an internal or external investigator appointed by the Accor Operations and will be overseen by the Accor Chief Whistleblower Officer (provided the eligible person gave permission for their identity to be disclosed to the Accor Chief Whistleblower Officer).

The eligible person will be asked for permission to share their identity with the appointed investigator, and may also be asked to participate in the investigation. They will be informed of the outcomes of the investigation, to the extent that is appropriate in the circumstances. It may not be appropriate to provide details of the investigation outcome where an investigation has resulted in disciplinary action against an officer, employee, contractor, or anyone otherwise working within the Accor Operations.

Where a report is made anonymously, the review and any investigation will be conducted on the information contained in the report, or otherwise available to the Accor Operations. As detailed above, reports made anonymously may limit the ability to make proper enquiries into the information contained in the report.

When investigating the information contained in a report, it is possible that the Eligible Whistleblower Recipient to whom the report is made, or other persons with whom the eligible person gives permission for their identity to be shared, may need to disclose information, other than the eligible person's identity, to persons where this is necessary for the purposes of the investigation, and that could potentially lead to the eligible person's identification. However,



all reasonable steps will be taken to minimise the risk that an eligible person will be identified in these circumstances.

### **How will Whistleblowers be protected and supported?**

The Accor Operations are committed to ensuring that whistleblowers are treated fairly and that they are not subject to any detrimental conduct. Detrimental conduct includes, for example, actual or threatened dismissal from employment, injury in employment, alteration of position or duties to the whistleblower's disadvantage, or discrimination, harassment or intimidation, harm or injury (including psychological harm), damage to property, damage to reputation, damage to business or financial position and any other damage to a person, because it is believed, or suspected, a whistleblower report has been made, may have been made, proposes to be made, or could be made.

Accor, or any entity involved in the conduct of the Accor Operations, may be vicariously liable for loss, damage or injury suffered by a person as a result of detrimental conduct taken by an employee of Accor, or that entity. All directors, officers, employees and others performing work for, or providing goods and services to, an entity involved in the conduct of the Accor Operations Accor are prohibited from causing, threatening, aiding, abetting, counselling, procuring, inducing, conspiring or being in any way, by act or omission, directly or indirectly knowingly concerned in, or party to, detrimental conduct to anyone because of, or for reasons including because of, the belief or suspicion that a whistleblower report has been made, or may have been made, proposes to be, or could be made.

The Accor Operations consider detrimental conduct towards an eligible person to be misconduct and will take any such conduct seriously. If an eligible person believes they have been subjected to detrimental conduct because they made a whistleblower report under this policy, they should immediately notify an Eligible Whistleblower Recipient (preferably the Accor Chief Whistleblower Officer or an Accor Local Whistleblower Officer).

There are also severe penalties under the Corporations Act for persons who engage in detrimental conduct towards a whistleblower.

### **How will Accor ensure the fair treatment of persons working within the Accor Operations mentioned in a Whistleblower report?**

An investigation of a whistleblower report may be conducted without the knowledge of persons mentioned in the report, either to keep the identity of the eligible person confidential, or to prevent persons suffering any detriment as a result of the report.

If as a result of an investigation or inquiries, we identify an issue which indicates that an employee, contractor or other person working within the Accor Operations may have engaged in misconduct, the person concerned will be given information about the substance of the alleged misconduct in writing and an opportunity to respond to those matters before any further steps are taken against them, including disciplinary action.

The Accor Operations will ensure there is appropriate training for its directors, officers and employees on the matters addressed in this policy.

All Accor Eligible Whistleblower Recipients will receive training on how to respond to whistleblower reports, protect confidentiality, and avoid detriment to a whistleblower.



## **BREACH OF POLICY**

All workplace participants within the Accor Operations are required to comply with this policy at all times. If an employee or contractor breaches this policy, they may be subject to disciplinary action, up to and including the immediate termination of their employment or engagement.

## **ACCOR INTEGRITY LINE**

Accor's global Integrity Line (administered by Accor SA), still remains available to make a whistleblower report. If a report is made through the Integrity Line, the policy relating to it is outlined as part of the reporting process and is available on the website. Please note that this policy may be different, including that the protections available to whistleblowers may differ from those that are outlined under this policy. Where a report made through the Integrity Line does not satisfy the conditions required to benefit from the whistleblower protections outlined in this policy, that report will be addressed under Accor's Grievance Policy (and not under this policy).

## **EFFECT OF THIS POLICY AND AMENDMENTS**

This policy does not, and is not intended to, form part of any contract between any entity involved in the conduct of the Accor Operations and any other person.

## **RELATED POLICIES**

The below is a list of additional policies that are related to the Whistleblower Policy. This list is not exhaustive and is subject to change;

- TC06 - Discrimination, Harassment, Sexual Harassment, Bullying and Victimisation Policy
- TC09 - Grievance Policy

## **FOR MORE INFORMATION**

If you do not understand any part of this policy it is important you ask your manager to explain it to you.

Accor reserves the right to amend or replace this policy at any time.

Adrian Williams  
Chief Operating Officer - Pacific

Angela Howard  
Senior Vice President Talent & Culture - Pacific



I have read, understood and agree to be bound by the policy set out above. I acknowledge that this policy may be updated and agree to ensure my actions will be in accordance with this updated policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_