



Employee Human Rights Commitments

Brady Hotels & Apartments

At Brady Hotels & Apartments, we are firmly committed to respecting and upholding the human rights of all individuals who contribute to our business—our employees, suppliers, and stakeholders. This commitment is woven into the fabric of our values and is reflected across key policies, including our **Code of Conduct**, **Anti-Discrimination Policy**, **Equal Opportunity Policy**, and **Modern Slavery Policy**.

As a proudly Melbourne-based hotel group, we recognise our responsibility to promote human rights across every aspect of our operations and supply chain. Guided by principles of fairness, inclusion, and respect, we work to foster a workplace culture that is safe, equitable, and free from discrimination or exploitation. Our team leads by example with integrity and accountability, embedding ethical conduct into daily practice. Doing the right thing isn't simply encouraged. It's expected, demonstrated, and supported at every level of our organisation.

We also encourage our team members to stay informed and engaged with evolving standards in human rights, including the guidance provided by the **Victorian Equal Opportunity & Human Rights Commission** (humanrightscommission.vic.gov.au).

To uphold this commitment, we implement robust human rights due diligence practices designed to identify, assess, and mitigate potential risks. These include:

- Internal reviews of workplace practices and employment conditions
- Regular audits of our supply chain and vendor compliance
- Active engagement with employees and stakeholders for feedback
- Continuous monitoring and updates to policies and procedures

Through these proactive measures, Brady Hotels & Apartments ensures that human rights are respected, ethical standards are upheld, and a culture of responsibility and compassion is maintained throughout our business.

Table of Contents

Policy	Page
Code of Conduct Policy	3
Labour Standards Policy	4
Modern Slavery Policy	5
Anti-Corruption Policy	6
Diversity and Equality Statement	7
Cultural respect and sensitivity	8

Code of Conduct Policy

At Brady Hotels & Apartments, we are committed to upholding the highest ethical standards and contributing positively to society. Our Code of Conduct outlines the following essential guidelines and principles that every employee and stakeholder must adhere to:

- 1. Ethical Standards:** We uphold unwavering ethical standards in all aspects of our operations, ensuring honesty, integrity, and transparency.
- 2. Legal Compliance:** We strictly adhere to all applicable laws, regulations, and industry standards relevant to our hotel operations.
- 3. Respectful Treatment:** We foster a culture of respect, inclusivity, and fairness, ensuring that all individuals, including employees and guests, are treated with dignity and without discrimination.
- 4. Environmental Responsibility:** We are committed to environmental responsibility by promoting sustainable practices, energy efficiency, waste reduction, and responsible sourcing.
- 5. Anti-Corruption and Bribery:** We strictly prohibit any form of corruption, bribery, or unethical practices, and we comply with anti-corruption laws at all times.
- 6. Conflict of Interest:** We expect employees to avoid any conflicts of interest and to disclose any potential conflicts that may arise during their employment.
- 7. Data Privacy and Security:** We prioritize the protection of sensitive information and guest data, ensuring its confidentiality and security.
- 8. Health and Safety:** We prioritise the safety and well-being of our employees and guests, maintaining a healthy and secure work environment.
- 9. Anti-Harassment and Anti-Discrimination:** We have a zero-tolerance policy towards harassment and discrimination based on race, gender, religion, or any other protected characteristic.
- 10. Grievance Mechanism & Remedy Framework:** Brady Hotels provides clear and confidential avenues for raising concerns related to human rights, discrimination, or unethical behaviour. All concerns are investigated promptly and fairly, and we are committed to providing appropriate remedies where rights may have been infringed.
- 11. Responsible Sourcing:** We encourage responsible sourcing practices to support sustainable and ethical suppliers.
- 12. Gifts and Hospitality:** We establish guidelines for receiving and offering gifts and hospitality to prevent conflicts and undue influence.
- 13. Reporting poor conduct:** We provide a clear and confidential reporting process for employees and stakeholders to report any violations of the Code of Conduct without fear of retaliation.
- 14. Training and Communication:** We ensure that all employees and relevant stakeholders receive proper training and regular communication about the Code of Conduct and its significance.
- 15. Consequences for Violations:** Violations of the Code of Conduct may result in disciplinary actions, ranging from counselling and training to termination, depending on the seriousness of the breach.
- 16. Periodic Review:** We commit to regularly reviewing and updating the Code of Conduct to remain aligned with changing laws and best practices.

By adhering to this Code of Conduct, Brady Hotels & Apartments fosters a positive and ethical work environment, ensuring that we fulfil our responsibilities to our employees, guests, stakeholders, and society as a whole.

Labour Standards Policy

To ensure labour standards are protected throughout our operations and supply chain, Brady Hotels takes several proactive actions:

1. **Compliance with Industry Regulations:** We diligently adhere to all relevant labour laws and regulations, including those outlined in the Hospitality Industry (General) Award. This ensures that our team members receive fair wages, appropriate employment agreements and that their work hours do not exceed the maximum limits set by the award.
2. **Equal Treatment and Opportunity:** We foster an inclusive work environment where all team members experience fair and equal treatment and have access to growth opportunities regardless of their background, gender, or other personal characteristics.
3. **Anti-Discrimination Measures:** We maintain a strict policy against discrimination, harassment, and intimidation, ensuring that our workplace remains respectful and supportive for everyone.
4. **Workers' Health and Safety:** We prioritise the health and safety of our workers by implementing appropriate measures and providing the necessary resources to create a safe working environment.
5. **Access to Fair Procedures:** Our team members have access to fair procedures, ensuring that their concerns and grievances are heard and addressed without fear of retaliation.
6. **Supply Chain Monitoring:** We extend our commitment to labour standards to our supply chain. Through regular monitoring and audits, we ensure that our suppliers also comply with ethical labour practices.
7. **Training and Education:** Bi-yearly training sessions are conducted to raise awareness among our team members about labour standards, identify potential issues, and equip them with the knowledge to prevent any form of modern slavery within our operations.

By taking these actions, Brady Hotels strives to uphold labour standards and promote a work culture that respects the rights, dignity, and well-being of all our team members and those involved in our supply chain.

Modern Slavery Policy

Purpose

Brady Hotels & Apartments is committed to operating ethically and with integrity in all business dealings. This policy outlines our approach to preventing modern slavery and human trafficking in our operations and supply chains, in accordance with the Modern Slavery Act 2018 (Cth).

We recognise that modern slavery is a serious violation of human rights and includes forced labour, debt bondage, child labour, and human trafficking. As a responsible hospitality provider operating exclusively in Melbourne, we are committed to identifying, mitigating, and addressing modern slavery risks.

This policy applies to:

- All Brady Hotels & Apartments employees, contractors, and suppliers
- All four hotel properties and business operations within Australia
- All direct and indirect supply chain relationships

Our Commitment

We commit to:

- Zero tolerance for all forms of modern slavery
- Promoting transparent and ethical business practices
- Ensuring that all individuals working with or for Brady Hotels are treated fairly, paid lawfully, and work voluntarily
- Regularly reviewing our supply chain and procurement processes for risks of exploitation
- Providing training and resources to increase awareness of modern slavery risks

Identifying and Managing Risk

We conduct risk assessments focused on:

- High-risk goods or services (e.g., uniforms, cleaning products, outsourced services)
- Suppliers operating in countries or sectors known for labour exploitation
- Labour hire or third-party staffing arrangements

When risks are identified, we take proportionate steps to address them, including supplier engagement, corrective action plans, or termination of non-compliant relationships.

Supplier Expectations

Suppliers must:

- Comply with all applicable labour, health and safety, and modern slavery laws
- Commit to ethical recruitment practices and responsible sourcing
- Ensure no forced, bonded, or involuntary labour exists in their operations
- Cooperate with Brady Hotels in audits, assessments, or due diligence reviews

All new suppliers are required to sign and adhere to our Supplier Code of Conduct, which includes modern slavery compliance obligations.

For questions, concerns, or to report potential breaches of this policy, please contact hr@bradyhotels.com.au

Anti-corruption Policy

At Brady Hotels, we have a strong commitment to conducting business with the highest ethical standards, and we take a zero-tolerance approach towards corruption in all its forms. Our anti-corruption policies and practices are designed to promote transparency, integrity, and accountability throughout our operations.

Here are some key elements of our anti-corruption framework:

1. **Code of Conduct:** We have a comprehensive Code of Conduct that outlines the expected behaviour of all employees, contractors, and stakeholders. This code explicitly prohibits any form of bribery, embezzlement, kickbacks, or other corrupt practices.
2. **Training and Awareness:** We provide as part of our onboarding and then bi-yearly training and awareness programs to our employees, ensuring they understand the importance of anti-corruption measures and are equipped to recognise and report any suspicious activities.
3. **Due Diligence:** Before entering partnerships or engagements with third parties, we conduct thorough due diligence to assess the risk of corruption associated with these entities.
4. **Gifts and Hospitality Policy:** We have clear guidelines regarding the acceptance and giving of gifts and hospitality to prevent any conflicts of interest or attempts to influence decision-making through improper means.
5. **Supplier Code of Conduct:** Our suppliers are expected to adhere to our ethical standards and comply with anti-corruption policies. We communicate our expectations to them and may terminate relationships with non-compliant suppliers.
6. **Reporting and Transparency:** We maintain open and transparent communication about our anti-corruption efforts with stakeholders, shareholders, and the public. We disclose relevant information through appropriate channels.
7. **Compliance with Laws:** We strictly comply with all applicable anti-corruption laws and regulations in Victoria which we operate.
8. **Continuous Improvement:** We regularly review and update our anti-corruption policies and practices to adapt to changing risks and to enhance the effectiveness of our measures.
1. By maintaining a robust anti-corruption framework, Brady Hotels ensures that all interactions, both internally and with external parties, are conducted with the highest level of integrity, fostering a culture of trust and accountability in our organisation.

Diversity and Equality Statement

At Brady Hotels & Apartments, we embrace diversity and are committed to creating an inclusive and welcoming environment for all. We firmly believe that diversity enriches our hotels and community, fostering a culture of respect, collaboration, and innovation.

Key elements of our Diversity and Inclusivity commitment include:

1. **Respecting Individual Differences:** We value the unique perspectives, experiences, and identities of all our team members, guests, and stakeholders.
2. **Non-Discrimination:** We do not tolerate discrimination based on race, colour, religion, gender, sexual orientation, gender identity or expression, age, national origin, disability, or any other protected characteristic.
3. **Equal Opportunities:** We provide equal opportunities for career development, advancement, and training to all our employees, based on merit and skills.
4. **Inclusive Workplace Culture:** We foster an inclusive workplace culture where everyone feels respected, valued, and empowered to contribute their best.
5. **An LGBTQ+ Ally commitment:** to create a supportive and inclusive environment for lesbian, gay, bisexual, transgender, and queer (LGBTQ+) individuals. It emphasizes the organisation's commitment to being an ally and advocate for LGBTQ+ rights and equal treatment.
6. **Diverse Hiring Practices:** We actively pursue diverse and inclusive hiring practices to attract talent from different backgrounds and experiences.
7. **Training and Education:** We invest in ongoing diversity and inclusion training initiatives for our employees to increase awareness and understanding.
8. **Community Engagement:** We actively engage with the broader community to promote diversity and inclusion through partnerships, initiatives, and outreach programs.
9. **Data Collection and Transparency:** We are committed to collecting data on diversity within our organization and being transparent about our progress and challenges.
10. **Leadership Commitment:** Our leadership team is dedicated to championing diversity and inclusion as core values and a key driver of our success.
11. **Continuous Improvement:** We continuously assess our diversity and inclusion practices and strive to improve and evolve.
12. **Accountability:** We hold ourselves accountable for driving diversity and inclusion efforts and measuring our progress.

For questions, concerns, or to report potential breaches of this policy, please contact hr@bradyhotels.com.au

Cultural respect and sensitivity

As all of our hotels are in Melbourne CBD, Brady Hotels & Apartments acknowledges the Wurundjeri people of the Kulin Nations, the traditional owners of this land. We pay our respects to their Elders past, present, and emerging and extend that respect to all the Aboriginal and Torres Strait Islander peoples.

We celebrate, value and include people of all backgrounds, genders, sexualities, cultures, bodies and abilities.