

**INTREPID**

**GLOBAL HUMAN RIGHTS POLICY**

VERSION 3

## VERSION CONTROL

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## REVIEWERS

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Name	Position	Version Approved	Date
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## 1. INTREPID TRAVEL'S COMMITMENT TO HUMAN RIGHTS

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Intrepid respects international human rights principles that promote and protect human rights, including the U.N. Guiding Principles on Business & Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We actively participate in the United Nations Global Compact.

Intrepid is a global small-group adventure tour operator that operates tours from our offices in countries worldwide. Considering that some countries in which we operate pose a high risk to businesses and their respective staff, leaders and contractors of human rights violations, whether direct or by association, we recognise that as a company, we need to address this issue within our sphere of influence.

By integrating a human rights commitment into Intrepid's responsible business agenda, we send a clear signal that we share the responsibility to respect, protect and address any human rights issues within the Company and the countries we operate in.

Intrepid is committed to complying with all relevant laws and the highest standards of openness, integrity, and honesty by creating this policy.

We do not tolerate any form of human rights violations from our staff, leaders, contractors, travellers or business partners. We believe our commitment will positively influence our reputation in the marketplace and our impact on local communities and the civil society of our operating countries.

## 2. SCOPE

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The policy applies to all Intrepid employees and employees of subsidiaries and joint ventures where Intrepid has a controlling interest. It also applies, as far as is reasonably achievable, to our upstream and downstream supply chain through partners, suppliers, and third-party contractors. It is the responsibility of the Core Management Team and cascades down to all managers and employees to comply with the policy and report any known instances of non-compliance.

In joint ventures where Intrepid does not have overall control, the leaders and managers of those businesses are strongly encouraged to adopt the same or similar standards. If any human rights issues arise in joint ventures, we will work actively with the business leaders to address them.

## 3. PURPOSE

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This policy aims to:

- Formalise our commitment to protect human rights within our sphere of influence and ensure that all our staff, leaders, contractors, travellers, suppliers, communities, and other stakeholders impacted by our business are treated fairly and respectfully.
- Work with our stakeholders to address issues that act as barriers to responsible practices to promote equity across our global community and protect our most vulnerable societies.
- Give guidance to our staff, leaders, and contractors on Intrepid Travel's stance concerning human rights issues.
- Commit our support to the principles of the Universal Declaration of Human Rights.
- Protect, respect and remedy human rights issues within our operations and supply chain as outlined in the United Nations Guiding Principles on Business and Human Rights: The "Protect, Respect and Remedy" Framework.
- Confirm our commitment to the United Nations Global Compact.
- Assist in monitoring our management of human rights issues as set out in this policy.

## 4. WHAT ARE HUMAN RIGHTS

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Human rights are universal basic rights and freedoms that belong to everyone equally.

These rights and freedoms are outlined in the United Nations (U.N.) Declaration of Human Rights and reflect the protection of every human being in every part of the world with the right to:

- Dignity;
- Equality;
- Freedom; and
- Respect.

Rights in the U.N. Declaration of Human Rights relevant to Intrepid include, but are not limited to:

- The right to live in freedom and safety;
- The right to work and the free choice of work;
- The right to an adequate standard of living;
- The right to rest and leisure;
- The right to freedom of opinion and expression;
- The right to freedom of thought, conscience and religion;
- The right to freedom from discrimination; and
- The right to freedom of peaceful assembly.

## 5. REVIEW AND CONSULTATION

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### 1. Staff, Leaders, and Contractors

Intrepid upholds, respects, protects and promotes the human rights of our staff, leaders and contractors as outlined in the U.N. Declaration of Human Rights, specifically in the following areas.

#### 1.1 Freedom from discrimination

Intrepid is committed to a workplace free from discrimination and harassment, where all staff, leaders and contractors demonstrate respect for one another. Unlawful discrimination, harassment or bullying related to an individual's race, gender, age, religion, sexuality, social status, nationality, impairment, political opinion or any other unrelated status of an individual's ability to perform work will not be tolerated.

As outlined in the ***Prevention of Discrimination, Bullying and Harassment in the Workplace Policy***, Intrepid has defined procedures for investigating any allegations of harassment, discrimination or bullying. Anyone found to have bullied, discriminated against, or harassed another individual during their work or activities related to work or to have condoned such behaviour will be subject to disciplinary action.

#### 1.2 Staff, leader and contractor representation

Intrepid respects the rights of all staff, leaders and contractors to express their views and participate in organised labour activities and will not tolerate discrimination against any members of a representative body.

#### 1.3 Gender Equality

Intrepid is committed to promoting equal opportunity for all staff, leaders and contractors.

All staff are entitled to parental-related leave equal to or greater than Intrepid's legal obligation.

Intrepid is committed to staff, leader and contractor development and has extensive internal training and development programs and resources in place. Policies such as the **Global Study Support Policy** support the continued learning and development of Intrepid employees through study opportunities that enhance the capability of the Company and promote personal growth.

The **Flexible Working Policy** assists all employees in achieving their personal, professional or family goals by facilitating flexibility in their work arrangements.

These policies enable effective succession planning and proactively support the progression of all staff, leaders and contractors within the organisation.

#### 1.4 Child & Forced Labour

Intrepid is committed to complying with the national laws on child labour and the minimum working age. Intrepid also does not use or support forced labour, including slavery, prison labour or labour enforced by intimidation. The overall terms of employment should be voluntary, and staff, leaders and contractors are selected and recruited in line with industry-wide standards.

Intrepid's Global Recruitment Principles aim to:

- Ensure a fair & consistent process is followed for all recruitment.
- Promote the selection of candidates for jobs based on their capability in relation to the specific job requirements and the best outcome for both the individual and Intrepid.

#### 1.5 Occupational Health & Safety Environment

As stated in our **OH&S Policy**, Intrepid assumes responsibility to ensure that all reasonable precautions are taken to provide and maintain working conditions that are safe and healthy and comply with all statutory requirements and codes of practice.

All staff, leaders and contractors are entitled to respectful working conditions, including access to clean restroom facilities, potable water and adequately ventilated workspaces.

Intrepid will so far as is reasonably practicable:

- Provide information, instruction, training and supervision to protect the health and safety of staff, leaders, contractors, visitors and the public.
- Consult with staff, leaders and contractors where relevant to enhance the effectiveness of procedures.
- Provide adequate resources to aid employees in fulfilling their responsibilities.
- Conduct investigations into all reported incidents.
- Conduct regular reviews and evaluations of the health and safety systems.

#### 1.6 Working Conditions

Intrepid, at a minimum, conforms to local legislation on all core working conditions and entitlements.

All staff, leaders and contractors receive a written contract stating the agreed terms and conditions. In the case of employment contracts, this includes specific entitlements regarding all types of leave in accordance with the legislation of the country where the staff member works.

As part of the Global Recruitment Principles:

- Each position must be graded (in consultation with the People Team) within the remuneration bands of Intrepid.
- The relevant General Manager or Regional Director must approve the final remuneration.

When setting the remuneration range for a role, Intrepid aims to:

- Maintain relative salaries within the Company that are fair and equitable.
- For every position in the Company to have a salary range that reflects variances in skill and experience levels within that position.
- Reward performance based on measurable performance outcomes while striking a balance with market, economic and business drivers.

## **2. Travellers**

Intrepid is actively committed to protecting and respecting all travellers' human rights and ensuring they respect the rights of each person within the group, their leader, and the communities they visit.

### **2.1 Freedom from Discrimination**

Intrepid respects and protects our travellers' right to remain free from discrimination. Any unlawful discrimination, harassment or bullying related to a traveller's race, gender, age, religion, social status, sexuality, nationality, impairment, political opinion, or any other unrelated status of a traveller will not be tolerated.

Travellers are made aware of the standards of behaviour Intrepid expects from its travellers, as outlined in the Responsible Travel Guidelines for travellers. For example, travellers learn the importance of respecting cultural differences, following appropriate dress standards and how to be environmentally responsible whilst travelling. This information equips travellers with the knowledge and understanding of how to respect and protect the rights of everyone within the group and the communities they visit.

### **2.2 Safety and Security**

Intrepid recognises that many roles within the business contribute to delivering a 'safe' product for our travellers. To ensure safety standards are met, all staff, leaders, contractors, suppliers and stakeholders must be aware of their specific roles and responsibilities for safety management and are required to comply with the **OH&S Policy and Procedures**, which outlines how Health and Safety should be managed to ensure our travellers' health and safety is not compromised.

## **3. Business Partners (DMCs, Leaders, Contractors, Operators, Suppliers, Agents, etc.)**

We seek to establish relationships with entities that share the same principles and values as Intrepid. We also promote human rights awareness and respect along our value chain, including adopting legal, contractual clauses. In the event of disrespect to human rights, duly proven by government authorities and mechanisms provided by legislation, we notify the supplier/partner or the traveller so they may adopt corrective measures. In cases in which such measures are not taken, we then are entitled to rescind the respective commercial relationship.

### **3.1 Freedom from Discrimination**

Intrepid expects business partners to promote a workplace free of discrimination, harassment, and bullying.

We are committed to following fair and consistent processes when entering into an agreement with a business partner. We promote the selection of business partners based on their capability to offer the services required with the best possible outcome.

### **3.2 Safety and Security**

Intrepid maintains a 'safety cycle' consisting of annual audits, training, risk assessments, monitoring, and reporting to ensure all possible risks are identified, mitigated/removed from our trips. Intrepid is committed to re-evaluating our relationship with any supplier or contractor should they not meet our safety expectations.

Where Intrepid employs security staff through either a contracted company or as a direct employee, we are committed to ensuring all security personnel are aware of and trained in our Human Rights stance, policy and procedures that concern aspects of human rights relevant to their role.

### 3.3 Child & Forced Labour

Intrepid expects business partners to promote a workplace that does not use, or support forced labour, including slavery, prison labour or labour enforced by intimidation.

Given the vulnerable conditions of porters in some areas we operate, Intrepid has developed a **Porter Policy** to protect the rights of the porters who provide a service to our groups. Intrepid encourages all business partners to adopt this policy and protect the rights of the porters they hire directly.

## 4. Local Communities

As part of our **Responsible Travel Policy**, Intrepid is committed to respecting the local customs, cultural practices, and religions of the communities we work in and visit so that we are continually welcomed and can meet and interact with local people in a positive and harmonious way without undue disruption.

Intrepid's core purpose is to provide fun, affordable, sustainable experience-rich travel that benefits local communities. Intrepid is dedicated to a responsible travel philosophy of ensuring our business promotes the fulfilment of human rights by maximising the social, environmental, and economic benefits to local communities. We aim to positively influence the communities we visit and work with while maintaining ongoing engagement that fosters local, sustainable development.

## 5. Government and Civil Society

Intrepid commits to abiding by the local legislation and rules where we operate. We seek to play a positive role within our sphere of influence and in capacity-building to realise human rights.

As required and where reasonably practicable, we will cooperate with authorities in promoting internationally recognised human rights as well as in the investigation of any incidents involving allegations of disrespect of the rights outlined in this policy performed to or by our staff, leaders, contractors, travellers, suppliers, and business partners.

## 6. RESPONSE PLAN

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### For staff:

In the case of witnessing any form of human rights violations inside or outside of Intrepid Group, the following steps should be taken:

- Record the instance in writing; and
- Inform your immediate Manager, General Manager, or any member of the Global Leadership Team.

If the violation involves the staff, leader or contractor's immediate Manager, General Manager, or member of the Global Leadership Team, the violation should be reported as detailed in the Intrepid Group Whistleblower policy.



## **For Travellers:**

If a traveller displays any form of human rights violations when engaging with Intrepid, Intrepid is to follow the steps within the [Intrepid Denylist Policy](#).

If a traveller encounters any form of human rights violation inside of Intrepid, they should:

- Raise their concerns with the Intrepid Global Customer Care team. Intrepid's Global Customer Care team will thoroughly investigate the alleged claims to determine what action is required to rectify the specific scenario while reviewing current policies/ implementing further policy to prevent a recurrence.
- Global Customer Care report on these issues raised by travellers and elevate issues to Intrepid's Legal team, who reports to Audit and Risk committee.

## **Staff Confidentiality policy**

Intrepid recognises that the decision to report a concern can be difficult to make and therefore take action to protect employees who make a disclosure, from being treated badly or unfairly dismissed.

Intrepid, where possible, will protect the individual's identity when they raise a concern and do not want their name disclosed.

The **Confidential Hotline Policy** outlines Intrepid's commitment to the highest standards of openness and accountability and to conduct our business legally and responsibly. The confidential hotline exists so that staff, leaders and contractors are able to confidentially bring any concerns regarding malpractice, wrongdoing or illegality to the Company's attention as soon as possible to allow them to be fully investigated and rectified.

It's important to note; If an allegation is made in good faith but the investigation does not confirm it, no action will be taken against the originator. However, if individuals make malicious allegations, actions may be considered against the individual making the allegations.

## **7. COMMUNICATION AND TRAINING**

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Intrepid will ensure that all staff are informed of and understand this policy. Each employee will receive relevant training, and new employees will be briefed during their induction training.

### **Due Diligence**

Intrepid recognises that human rights risks may change as business and external influences evolve. As such, this policy will be reviewed and updated as necessary. Over time, any alterations to the policy will be communicated amongst the entire organisation and affected stakeholders.

## **8. ROLES & RESPONSIBILITIES**

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Every Intrepid staff member is responsible for countering human rights violations and adhering to this policy.

### **1. Communication and issue management**

Primary Responsibility: Country G.M.s, Purpose, People, and Customer Team (globally)

DMC General Managers have a responsibility for ensuring human rights standards are adhered in their region, and for resolving non-compliance with this policy.

The Purpose Team are responsible for the contents of this policy, action plans and reporting to the Core Management Team. The People Team are responsible for ensuring that all staff receive a copy of this policy, understand its contents and have access to handling procedures. They are also charged with implementing and processing any allegations through the Staff Confidentiality Policy alongside Immediate Managers and the Intrepid Global Leadership Team.

The Global Customer Care Team are responsible for processing any allegations from travellers, in consultation with the legal team, alongside Immediate Managers and the Intrepid Global Leadership Team.

## **2. Governance**

Primary Responsibility: Intrepid Group Audit & Risk Committee of the Intrepid Board

Overall responsibility to ensure that Intrepid is not complicit in any human rights violations ultimately belong to the Intrepid board with implementation oversight by the Core Management and Global Leadership Teams.

## **3. Sanctions**

Any reported and proven violations of this policy will result in remediation of the violation. Failure to observe and follow this policy may be a cause for disciplinary action for Intrepid staff, leaders, and contractors. Intrepid staff members will not be penalised or be subject to adverse consequences for reporting genuine concerns of any human rights violations.

## **9. SUPPORTING PROCEDURES AND POLICIES**

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Intrepid has a set of global principles and policies that underpin this policy, all of which are accessible on the Policy Portal Yammer page.