

GLOBAL HUMAN RIGHTS POLICY

Intrepid Group

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Intrepid Group is the global leader in delivering sustainable experience-rich travel. The world's largest travel B Corp, we're committed to being the best travel company for the world.

Intrepid Group's Commitment

As a signatory of the United Nations Global Compact we are committed to supporting and respecting internationally proclaimed human rights and ensuring we are not complicit in human rights abuses.

Intrepid Group is a global small group adventure tour operator that operates tours from our offices in countries all over the world. 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 that be direct or by association, we recognise that Intrepid Group as a company needs to address this issue within our sphere of influence.

Through the integration of a human rights commitment into Intrepid Group's responsible business agenda, we send a clear signal that we share responsibility to respect, protect and address any human rights issues within the company and the countries that we operate.

Intrepid Group is committed to comply with all relevant laws and the highest standards of openness, integrity and honesty through the creation of this policy.

We do not tolerate any form of human rights violations from our staff, leaders, contractors, travellers or business partners and commit to positively influencing the local communities and the civil societies we operate in.

Scope

The Human Rights policy extends to all companies within the Intrepid Group and where Intrepid Group has policy control over the entity. This policy is approved by the Audit and Risk Committee of the Intrepid Group Board.

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.

Aims

The aim of this policy is to formalise our commitment to:

- Protect human rights within our sphere of influence and ensure that all our people including our staff, leaders, contractors, travellers, suppliers and local communities as well as other stakeholders who are impacted by our business, are treated with globally accepted standards of fairness and respect;
- Work with our stakeholders to address issues that act as barriers to responsible practices, in order to promote equity across our global community and protect our most vulnerable societies;

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- Give guidance to our staff, leaders and contractors on Intrepid Group's stance in relation to human rights issues;
- Commit our support to the principles contained within the Universal Declaration of Human Rights;
- Protect, respect and remedy human rights issues within our sphere of 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; and
- Monitor and manage human rights issues as set out in this policy.

Definition of Human Rights

WHAT ARE 'HUMAN RIGHTS'?

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

These rights and freedoms are outlined in the United Nations (UN) 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 UN Declaration of Human Rights relevant to Intrepid Group 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.

Intrepid Group's Stance

1. STAFF, LEADERS AND CONTRACTORS

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

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1.1 FREEDOM FROM DISCRIMINATION

Intrepid Group 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 Group has defined procedures for investigating any allegations of harassment, discrimination or bullying. Anyone found to have bullied, discriminated against or harassed another individual in the course of 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 Group 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 Group is committed to promoting equal opportunity for all staff, leaders and contractors in the workplace.

Intrepid Group'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 Group.

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

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

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

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

1.4 CHILD & FORCED LABOUR

Intrepid Group, at a minimum, is committed to complying with the national laws on child labour and the minimum working age. Intrepid Group also do not use or support any type of forced labour, including slavery, prison labour or labour enforced by intimidation.

The overall terms of employment should be voluntary and employees should have a transparent and reasonable way to end the employment if they so choose. Staff, leaders, and contractors must be selected and recruited in line with industry-wide standards.

1.5 OCCUPATIONAL HEALTH & SAFETY ENVIRONMENT

As stated in our **OH&S Policy**, Intrepid Group assumes responsibility to see that all reasonable precautions are taken to provide and maintain working conditions, which are safe, 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 Group will, so far as is reasonably practicable:

- Provide information, instruction, training and supervision to protect the health and safety at work 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 Group, at a minimum, conforms to local legislation on all core working conditions and entitlements.

All staff, leaders and contractors receive a written contract stating agreed terms and conditions and 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

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staff member works. Contracts must be in a language that can be read and understood by those required to sign.

As part of the Global Recruitment Principles:

- Each position must be graded (in consultation with the People Team) within remuneration bands of Intrepid Group;
- Final remuneration must be approved by the relevant Core Management Team member.

When setting the remuneration range for a role, Intrepid Group 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 whilst also striking a balance with market, economic and business drivers.

2. TRAVELLERS

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

2.1 FREEDOM FROM DISCRIMINATION

Intrepid Group respects and protects our traveller's 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 Group expects from its travellers and 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 be respectful of, and protect the rights of, everyone within the group and the communities that they visit.

2.2 SAFETY AND SECURITY

The Intrepid Group recognises that many roles within the business contribute to the delivery of 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

role and responsibilities for safety management, and are required to comply with the **Intrepid Group H&S Policy and Procedures**, which outline 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.)

Intrepid Group recognises and respects the human rights of our business partners and acts with due care before engaging with a business partner to ensure they are aware of and respect our Human Rights standing.

3.1 FREEDOM FROM DISCRIMINATION

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

We are committed to following fair and consistent processes when entering an agreement with a business partner and 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

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

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

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

4. LOCAL COMMUNITIES

As part of our **Responsible Travel Policy**, Intrepid Group 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.

In keeping with the Intrepid Group's Impact statement "To be the best travel company for the world", Intrepid Group 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 serve as a positive influence in the communities in which we visit and work, while maintaining ongoing engagement that fosters local sustainable development.

5. GOVERNMENT AND CIVIL SOCIETY

Intrepid Group commits, at a minimum, 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 for the realisation of 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.

Response Plan

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**.

STAFF WHISTLEBLOWER POLICY

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

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Intrepid Group, where possible, will protect the individual's identity when he or she raises a concern and does not want their name to be disclosed.

The **Whistleblower Policy** outlines Intrepid Group's commitment to the highest standards of openness and accountability, and to conducting our business both legally and responsibly. The Whistleblower policy exists so that staff, leaders and contractors are able to confidentially bring any concerns regarding malpractice, wrong doing 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 it is not confirmed by the investigation, no action will be taken against the originator. However, if individuals make malicious allegations, actions may be considered against the individual making the allegations.

Communication and Training

Intrepid Group will ensure that all staff, leaders and contractors are informed of and understand this policy. Each will receive relevant training as a part of their induction training.

DUE DILIGENCE

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

Roles & Responsibilities

Every Intrepid Group staff member has a responsibility to counter human rights violations and adhere to this policy.

ADEQUATE INTERNAL CONTROLS

Primary Responsibility:

- All Intrepid Group Managers
- Intrepid Group Global Leadership Team
- The People Team

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All Intrepid Group Managers, the Intrepid Group Global Leadership Team, as well as People Team members, all play key roles in providing responsible practices and adequate system of internal controls and that those controls are effective.

COMMUNICATION AND ISSUE MANAGEMENT

Primary Responsibility: People Team (globally)

The Global People Team together with local Human Resource representatives are responsible for ensuring that all staff receive a copy of this policy, understand its contents and have access to handling procedures. The People Team are also charged with implementing and processing any allegations through the **Staff Whistleblower Policy** alongside the Intrepid Group Core Management Team.

Responsibility for the implementation and monitoring of this policy belongs to the Global Leadership Team.

GOVERNANCE

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

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

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 Group staff, leaders and contractors. Intrepid Group staff members will not be penalised or be subject to adverse consequences for reporting genuine concerns of any human rights violations.

Supporting procedures and policies

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