



# **GLOBAL HUMAN RIGHTS POLICY**

## **Intrepid Travel**

## Document Details

Version	Modifications	Author	Date	Status
1	Policy created	Responsible Business team	2018	Approved
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## Document Approval

Name	Date	Version
Core Management Team – Intrepid Travel	30 April 2026	4
Audit and Risk Committee – Intrepid Travel	26 May 2026	4

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*This policy is publicly available at* [Company Documents | Intrepid Travel AU](#)

## 1. Intrepid Travel's Commitment

Intrepid Travel respects internationally recognised human rights and is committed to avoiding and addressing adverse human rights impacts connected to our operations, products and services, and our value chain.

This commitment is guided by the **United Nations Guiding Principles on Business and Human Rights (UNGPs)**, the **Universal Declaration of Human Rights and International Bill of Human Rights**, and the **International Labour Organisation's Declaration on Fundamental Principles and Rights at Work**.

In line with the UNGPs, Intrepid is committed to:

- Respecting human rights by avoiding infringing on the rights of others and by addressing adverse impacts with which we are involved;
- Conducting ongoing human rights due diligence to identify, assess and prioritise actual and potential negative human rights impacts on people, rather than risks to the business;
- Preventing and mitigating adverse human rights impacts directly linked to our operations, business relationships and destinations; and
- Providing or cooperating in effective remediation where we identify that Intrepid has caused or contributed to adverse human rights impacts.

By creating this policy, Intrepid is committed to complying with all relevant laws and assessing our potential negative human rights risks and impacts, with the highest standards of openness, integrity and honesty.

Our commitment applies to all individuals and communities affected by our activities, including our employees, leaders and contractors, suppliers and supplier workers, tour leaders, business partners, travellers, and local communities connected to our trips, facilities and destinations.

Intrepid recognises that we operate in diverse contexts, including some countries and destinations with heightened human rights risks. We are committed to using our influence to promote respect for human rights and to continuously improving how we identify, prevent and address human rights impacts across our business.

## 2. Scope

This policy applies to all individuals and communities affected by Intrepid's operations and entire value chain. This includes, but is not limited to:

- Employees, leaders and contractors;
- Suppliers, Destination Management Companies (DMCs), business partners and supplier workers;
- Travellers and customers; and
- Local communities and Indigenous Peoples connected to our trips, facilities and destinations.

This policy applies across Intrepid’s own operations, including offices, trips and Intrepid-owned or leased accommodation, as well as business relationships throughout our value chain, such as suppliers, partners and service providers.

In joint ventures or business relationships where Intrepid does not have operational control, we seek to use our influence to encourage respect for human rights and alignment with the principles set out in this policy. Where human rights issues arise in such contexts, we will work with relevant partners to seek to prevent or address adverse impacts.

This policy applies globally and is relevant to all countries and destinations in which Intrepid operates.

### **3. Objectives of this policy**

The objectives of this policy are to:

- Formalise Intrepid Travel’s commitment to respect internationally recognised human rights across our operations and value chain, in line with the United Nations Guiding Principles on Business and Human Rights.
- Provide a clear framework for identifying, preventing, mitigating and addressing actual and potential adverse human rights impacts connected to our activities, relationships and destinations.
- Clarify expectations and responsibilities for staff, leaders, contractors, business partners and other stakeholders in relation to human rights.
- Support consistent and effective human rights due diligence, including the identification of salient human rights risks, escalation of concerns, and access to remedy.
- Enable transparency, accountability and continuous improvement in how Intrepid manages human rights risks and impacts over time.
- Demonstrate alignment with recognised international standards, including the Universal Declaration of Human Rights, the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

### **4. Definition of Human Rights**

Human rights are the basic rights and freedoms that belong to all people, everywhere. They are universal, inherent, indivisible and interrelated, and apply equally to all individuals without discrimination.

Internationally recognised human rights are set out in the Universal Declaration of Human Rights (UDHR) and the International Bill of Human Rights, which articulate

fundamental civil, political, economic, social and cultural rights necessary for dignity, equality, freedom and respect.

Human rights relevant to Intrepid's business activities include, but are not limited to, the rights to:

- Life, liberty and personal safety;
- Equality and freedom from discrimination;
- Freedom of opinion, expression, association and peaceful assembly;
- Just and favourable conditions of work, including fair pay and reasonable working hours;
- Safe and healthy working conditions;
- Freedom from forced labour, child labour, slavery and human trafficking;
- An adequate standard of living; and
- Rest, leisure and family life.

Workers' rights are further defined by the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, which identifies core labour standards including:

- Freedom of association and the effective recognition of the right to collective bargaining;
- The elimination of all forms of forced or compulsory labour;
- The abolition of child labour;
- The elimination of discrimination in respect of employment and occupation; and
- The promotion of safe and healthy working environments.

Intrepid also recognises the distinct rights of Indigenous Peoples, as reflected in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). These include rights to culture, identity, land, self-determination and free, prior and informed consent, particularly where business activities may affect Indigenous lands, communities or cultural heritage.

Intrepid recognises that human rights impacts may be experienced differently depending on context, power dynamics and vulnerability, and is committed to identifying and addressing actual and potential adverse impacts on people connected to our operations and value chain.

## **5. Human rights salience assessment**

Intrepid conducts a Salient Human Rights Assessment at least every three years, or more frequently where significant changes to our business occur.

The assessment is based on desk-based research and engagement with relevant stakeholders, including affected or potentially affected rightsholders. It identifies actual

and potential negative human rights impacts on people, rather than risks to the business; specifically specific human rights issues, including labour rights, non-discrimination, health and safety, child and forced labour, and the rights of Indigenous Peoples and local communities. The assessment also identifies where impacts are most salient, including by country, destination, sector, supplier type or worker group.

Human rights risks are prioritised based on their severity (scale, scope and irremediability) and likelihood, in line with the UN Guiding Principles on Business and Human Rights.

The assessment covers all individuals and communities affected by Intrepid's own operations and value chain, including employees, supplier workers, travellers and local communities.

The assessment considers relevant external risk inputs, including country and sector-level risks identified through recognised tools such as the B Corp Risk Tool (FR3.1) and the Roundtable Human Rights in Tourism Destination Risk Map.

Findings from the assessment inform Intrepid's prevention, mitigation and remediation actions, and are used to update policies, procedures, supplier engagement, training and grievance mechanisms.

The most recent Salient Human Rights Assessment was conducted in May 2026.

### **Triggers for Proactive Assessment**

In addition to periodic assessments, Intrepid will proactively assess potential human rights impacts where there are significant changes to our business or operating context.

This includes, but is not limited to:

- Entering new countries or destinations;
- Introducing new product types or trip activities;
- Engaging new categories of suppliers or delivery partners;
- Mergers, acquisitions or joint ventures; or
- Significant changes to laws, conflict, environmental conditions or human rights risks in countries where we operate.

These assessments aim to identify and address potential negative impacts early, before harm occurs.

## **6. Intrepid Travel's Stance**

Intrepid Travel is committed to respecting and promoting human rights across our operations and value chain. We expect our staff, leaders, contractors, business partners and travellers to act in ways that uphold the dignity, rights and safety of others, consistent with internationally recognised human rights standards.

Our stance reflects our responsibility to avoid causing or contributing to human rights harm, to address impacts where they occur, and to use our influence to prevent and mitigate adverse impacts directly linked to our operations, products, services and business relationships.

### **6.1 STAFF, LEADERS AND CONTRACTORS**

Intrepid is committed to providing a workplace that upholds the human rights of all staff, leaders and contractors. This includes freedom from discrimination, harassment and exploitation; respect for diversity and equal opportunity; safe and healthy working conditions; fair recruitment, remuneration and working hours; and freedom of association.

We do not tolerate child labour, forced labour, modern slavery or any form of abuse or exploitation. Employment and engagement with Intrepid is voluntary and based on lawful, fair and transparent practices.

These commitments are supported by Intrepid's People policies and procedures, including those relating to discrimination and harassment, recruitment, health and safety, wellbeing, safeguarding and grievance handling.

### **6.2 TRAVELLERS AND CUSTOMERS**

Intrepid is committed to protecting and respecting the human rights of our travellers and customers and to ensuring our trips are delivered in a way that is safe, inclusive and respectful.

We expect travellers to respect the rights, dignity and cultural norms of fellow travellers, local communities, leaders and staff. Discrimination, harassment, bullying or abusive behaviour is not tolerated and may result in removal from a trip.

Our expectations of traveller behaviour are communicated through customer information, booking conditions and our [Responsible Travel Policy](#).

### **6.3 BUSINESS PARTNERS AND SUPPLIERS**

Intrepid seeks to work with business partners and suppliers who share our commitment to respecting human rights. We expect our partners to avoid causing or contributing to human rights harm and to address adverse human rights impacts connected to their operations.

Where we identify heightened human rights risks in our value chain, we seek to work with partners to improve practices and outcomes. In cases of serious or persistent non-compliance, Intrepid may review, suspend or exit business relationships.

Our expectations of suppliers and partners are set out in relevant contractual arrangements, codes of conduct and engagement processes.

## **6.4 LOCAL COMMUNITIES AND INDIGENOUS PEOPLES**

Intrepid is committed to respecting the rights, cultures and livelihoods of local communities in the destinations where we operate. We seek to maximise positive social, environmental and economic outcomes for communities and to avoid activities that may cause harm or exclusion.

We recognise the distinct rights of Indigenous Peoples, including rights to culture, land, self-determination and free, prior and informed consent, and seek to engage respectfully and responsibly where our trips interact with Indigenous communities.

## **6.5 GOVERNMENT AND CIVIL SOCIETY**

Intrepid complies with applicable local laws and regulations in the countries where we operate and seeks to play a constructive role, within our sphere of influence, in promoting respect for human rights.

Where appropriate and lawful, we will cooperate with authorities and relevant institutions in relation to investigations or actions concerning alleged human rights violations connected to our operations or value chain.

## **6.5 SUPPORTING POLICIES**

This stance is supported by a range of Intrepid policies and procedures, including but not limited to:

- [The Stakeholder Grievance Policy](#)
- [Responsible Travel Policy](#)
- [Supplier Code of Conduct](#)
- [Child Safeguarding Policy](#)
- [Workplace conduct](#), [discrimination](#), [health, safety and wellbeing](#), [occupational health and safety](#) and [whistleblower](#) policies

These policies provide further detail on implementation, reporting, investigation and remediation processes.

## 7. Raising Concerns and Grievances

Intrepid encourages and expects the reporting of any actual or potential human rights violations connected to our operations, products, services or value chain. Concerns may be raised by employees, contractors, suppliers and supplier workers, travellers, community members, partners, civil society organisations or any other affected stakeholders.

Intrepid is committed to ensuring that reporting channels are accessible, confidential and safe, and that individuals who raise concerns in good faith are protected from retaliation.

### **How to Raise a Concern**

Any stakeholder may raise a concern or grievance through [Intrepid's Global Stakeholder Grievance Process](#), which provides a consistent, transparent and UN Guiding Principles-aligned process for reporting, investigating and addressing human rights impacts.

Concerns may be raised through:

- A publicly available online grievance form;
- A dedicated grievance email address;
- Verbal or written reporting via Intrepid staff, leaders or partners; or
- Existing safeguarding or whistleblower channels, where relevant.

Concerns may be raised anonymously or confidentially, subject to applicable legal requirements. Where appropriate, Intrepid will work with the reporting party to understand the issue, their desired outcome, and the most appropriate course of action.

### **Response, Investigation and Escalation**

All reported concerns are reviewed and triaged in line with the Global Stakeholder Grievance Policy, which sets out clear steps for acknowledgment, assessment, investigation, escalation and remediation.

Concerns are prioritised based on their severity and likelihood, with serious or high-risk impacts escalated to senior management and, where appropriate, the Audit & Risk Committee of the Intrepid Travel Board.

Where additional information is required, Intrepid may seek further evidence and engage with affected stakeholders or their representatives, in line with principles of confidentiality, consent and non-retaliation.

### **Protection from Retaliation**

Intrepid does not tolerate retaliation against any individual who raises a concern or grievance in good faith. This includes protection from intimidation, discrimination, harassment or adverse treatment.

Where requested and possible, Intrepid will protect the identity of individuals raising concerns and limit the sharing of information to those involved in managing and resolving the issue.

### **Access to Remedy**

Where Intrepid identifies that it has caused or contributed to a human rights impact, we are committed to providing or cooperating in appropriate and effective remediation, informed by engagement with affected stakeholders.

## **8. Identifying, escalating and addressing human rights impacts**

Intrepid maintains an enterprise-wide process to collect, triage, prioritise and escalate information on actual and potential negative human rights impacts.

Human rights impacts may be identified through multiple channels, including:

- Salient human rights assessments;
- Stakeholder engagement and supplier audits;
- Incident reporting systems; and
- Grievances raised through Intrepid's Global Stakeholder Grievance Mechanism.

Identified impacts are prioritised and escalated based on their severity and likelihood, with severe impacts escalated to senior management and, where appropriate, the Audit & Risk Committee of the Intrepid Board.

Where additional information is required, Intrepid will seek further evidence and, where appropriate, engage with affected stakeholders or their representatives, in line with principles of confidentiality, consent and non-retaliation.

Roles, responsibilities and escalation thresholds for managing human rights impacts are defined in supporting procedures and the Global Stakeholder Grievance Policy.

## **9. Training and communication**

Intrepid is committed to ensuring that this Human Rights Policy, our human rights expectations, and our grievance mechanisms are clearly communicated, well understood and effectively embedded across our operations and value chain.

All staff and leaders receive training on Intrepid's commitment to human rights, this policy, and their responsibility to identify and raise actual or potential human rights

concerns. This training is provided through onboarding and ongoing learning and is refreshed periodically to remain relevant to roles and risk contexts.

Role-specific training is provided to staff and leaders whose roles are more directly connected to human rights risks or impacts, including those involved in destination operations, supplier engagement, procurement, customer care, safety, people management and grievance handling. This training focuses on recognising human rights risks, responding appropriately, escalation pathways, and engagement with affected stakeholders.

Intrepid ensures that grievance pathways are communicated and accessible to all relevant internal and external stakeholders, including employees, contractors, suppliers and supplier workers, travellers, community members and partners. Information on how to raise concerns is publicly available and communicated through relevant policies, supplier engagement, customer information and other appropriate channels.

Any stakeholder may raise concerns or grievances through Intrepid's Global Stakeholder Grievance Mechanism, which provides clear steps, protections from retaliation, confidentiality safeguards and guidance on how concerns will be assessed, escalated and addressed.

Intrepid maintains a consolidated grievance register and undertakes regular analysis of grievances and trends to identify systemic issues, assess the effectiveness of prevention and remediation actions, and inform continuous improvement. Aggregated insights from grievance data are reported to senior management and the Audit & Risk Committee and inform human rights due diligence and policy updates.

This policy, the Global Stakeholder Grievance Policy and supporting guidance are reviewed regularly to ensure they remain effective, accessible and aligned with recognised international standards and emerging human rights risks.

## **10. Due Diligence**

Intrepid recognises that human rights risks may change over time as both business and external influences evolve. As such, this policy will be reviewed and updated every three years or sooner if required. Any alterations to the policy over time will be communicated amongst the entire organisation and affected stakeholders. The policy will be approved by the Audit and Risk Committee of the Intrepid Travel Board.

## **11. Roles & Responsibilities**

### **Board Oversight**

The Intrepid Travel Board, through its Audit & Risk Committee (ARC), has the highest governance oversight of human rights matters at Intrepid. The ARC is responsible for:

- Approving this Human Rights Policy;
- Overseeing Intrepid's human rights due diligence approach;

- Reviewing escalated and severe human rights risks and impacts; and
- Monitoring the effectiveness of remediation actions and grievance mechanisms.

### **Executive Accountability**

The Senior Management Team is responsible for ensuring this policy is effectively implemented across Intrepid's operations and value chain, including integrating human rights considerations into decision-making, strategy, risk management and resourcing.

### **Impact Team**

The Impact Team has overall responsibility for:

- Maintaining and updating this Human Rights Policy;
- Leading Intrepid's human rights due diligence, including Salient Human Rights Assessments;
- Coordinating cross-functional responses to salient human rights risks;
- Ensuring alignment between this policy, the Global Stakeholder Grievance Policy and related procedures; and
- Reporting on human rights performance, risks and trends to the Senior Management Team and the Audit & Risk Committee.

### **Legal Team**

The Legal Team is responsible for:

- Overseeing the Global Stakeholder Grievance Mechanism;
- Ensuring grievances are triaged, escalated and addressed in line with severity and likelihood;
- Supporting investigations, remediation planning and resolution where legal risk or complexity is present;
- Managing escalations to the Audit & Risk Committee where required; and
- Ensuring compliance with applicable laws, non-retaliation protections and confidentiality requirements.

### **People Team**

The People Team is responsible for:

- Implementing this policy as it relates to employees, leaders and contractors;
- Managing employee-related grievances and investigations in line with the Global Stakeholder Grievance Policy;
- Ensuring staff are trained on this policy, grievance pathways and their rights and responsibilities; and
- Supporting remediation actions related to employment practices and workplace impacts.

### **Customer, Safety and Operations Teams**

The Customer, Safety and Operations Teams are responsible for:

- Identifying and escalating actual or potential human rights impacts affecting customers and travellers;
- Supporting incident management, investigations and corrective actions;
- Integrating human rights considerations into customer care, safety management and trip operations; and

- Cooperating in remediation where Intrepid has caused or contributed to harm.

### **Destination Management Companies (DMCs) and Hotel General Managers**

DMC General Managers and Hotel General Managers are responsible for:

- Implementing this policy within their respective operations;
- Identifying and escalating human rights risks and impacts in destinations, hotels and supplier relationships;
- Ensuring suppliers and partners are aware of Intrepid’s human rights expectations and grievance channels; and
- Cooperating in investigations, remediation measures and preventive actions.

### **All Staff, Leaders and Contractors**

All Intrepid staff, leaders and contractors have a responsibility to:

- Understand and comply with this policy;
- Treat others with dignity and respect;
- Identify and raise actual or potential human rights concerns; and
- Cooperate with investigations and remediation efforts as required.

*\*Note that the Hotel General Managers referred to in this document relate to Intrepid-owned and leased hotels.*

## **12. Governance**

This policy is approved by the Audit & Risk Committee of the Intrepid Travel Board, which has highest governance oversight of human rights matters within Intrepid.

Overall responsibility to ensure that Intrepid is not complicit in any human rights violations ultimately belongs to the Intrepid Board with implementation oversight by the Senior Management Team.

A human rights due diligence audit will be conducted every 3 years and findings will inform Intrepid’s Human Rights Plan.

Audit timeframe	Human Rights Salience Assessment	Approval by Intrepid RAC	Update Human Rights Plan
May 2026		~August 2026	October 2026
May 2029		~ August 2029	October 2029
May 2032		~ August 2032	October 2032

## **13. Remediation**

Where Intrepid identifies that it has caused or contributed to an adverse human rights impact, we are committed to providing or cooperating in appropriate and effective remediation, informed by engagement with affected stakeholders.



Remediation may include, depending on the circumstances, apologies, restitution, rehabilitation, financial or non-financial compensation, corrective actions, and measures to prevent recurrence.

Access to remedy is primarily provided through Intrepid's Global Stakeholder Grievance Mechanism, which is designed to meet the effectiveness criteria for non-judicial grievance mechanisms set out in Principle 31 of the UN Guiding Principles on Business and Human Rights.

Intrepid will not tolerate retaliation against any individual who raises a concern or grievance in good faith.

#### **14. Supporting procedures and policies**

Intrepid has a set of global principles and policies that underpin this policy, all of which are accessible on the [\*\*\*Policy Portal\*\*\*](#) Viva Engage page.