

# Modern Slavery Statement



A Member of CapitaLand



A Member of The Ascott Limited

# Modern Slavery Statement.

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) by Ascott International Management (Australia) Pty Ltd ACN 078 223 186 (**Ascott**) and its related entities and subsidiaries which includes QSA Group Pty Ltd ACN 134 361 149 (**Quest**).

Throughout this Statement, Ascott, Quest and its subsidiaries and related entities are collectively referred to as “we” or “our” or “us”.

This is our third Statement, which outlines the steps we have taken during the financial reporting year ending 31 December 2024 to understand and address the modern slavery risks in our operations and supply chains.

We are committed to identifying, assessing and eliminating modern slavery risks in our business operations and supply chain.

## Our Brands.



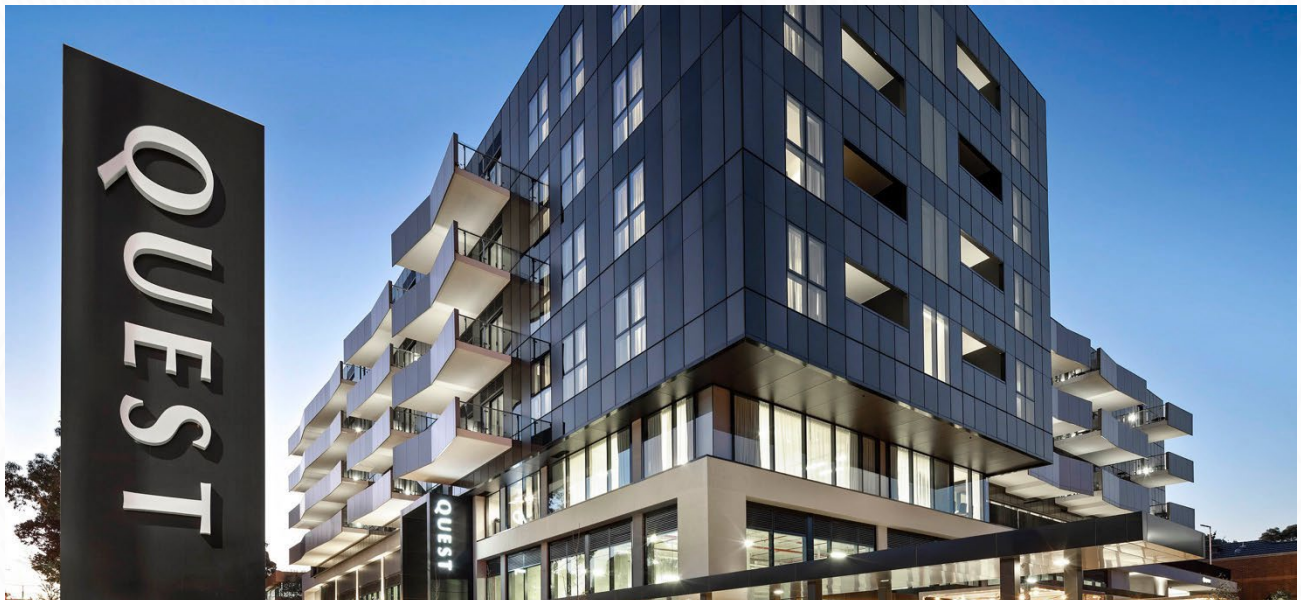
citadines



Oakwood.



citadines  
CONNECT



# Statement by Managing Director.

## Standing against modern slavery.

At Ascott, including our subsidiary Quest Apartment Hotels, our purpose is to enhance lives through exceptional hospitality experiences. This purpose is grounded in a deep commitment to care — for our people, our guests, and the broader communities in which we operate.

Modern slavery in any form is fundamentally incompatible with our values. As Managing Director, I affirm our zero-tolerance approach to modern slavery, forced labour, and human trafficking within our operations and supply chains.

We understand the importance of proactive leadership in this space. Our commitment extends beyond compliance — it is embedded in how we conduct business, select partners, and assess risk. We continue to evolve our practices to identify and address vulnerabilities, and we remain focused on promoting responsible and ethical conduct across every level of our organisation.

The eradication of modern slavery requires sustained effort, continuous learning, and collaborative action. I am proud to lead Ascott and Quest on this journey and reaffirm our unwavering commitment to protecting human rights and ensuring dignity for all.

**DAVID MANSFIELD**  
MANAGING DIRECTOR  
ASCOTT & QUEST – AUSTRALIA

# Structure, operations and supply chain.

## Structure.

### ASCOTT

Ascott is a subsidiary of The Ascott Limited which is headquartered in Singapore and has grown to be one of the leading international lodging owner-operators. It has a presence in more than 30 countries across Asia Pacific, Central Asia, Europe, the Middle East, Africa and the USA.

The Ascott Limited is a member of CapitaLand Investment Limited (**CapitaLand**), one of Asia's largest diversified real estate groups.

Ascott's serviced residence & hotel brands in Australia include Quest, Citadines, lyf and Oakwood.

### QUEST

Quest is incorporated in Australia and has approximately 160 metropolitan, regional and suburban locations throughout Australia, New Zealand, United Kingdom and Fiji.

Quest operates under a franchise model with approximately 113 hotels in Australia run by passionate local owners. In addition, Quest has 5 pre-franchised properties that are company-owned hotels.

## Operations.

### ASCOTT & QUEST

Our corporate office has approximately 126 employees.

Ascott employs approximately 278 employees, either as full-time, part-time or casual employees, across its managed properties which includes Citadines, lyf and Oakwood brands.

Quest employs approximately 97 people within its company-owned hotels (i.e. non-franchised hotels).

Quest employs full-time, part-time and casual employees who are engaged on written employment agreements and subject to modern awards depending on their position. There are no enterprise agreements.

There is currently no one under the age of 18 years employed by our corporate office or our managed and non-franchise properties.

### *Quest franchise network*

Quest's franchisees in Australia (approximately 113 hotels) are estimated to directly employ approximately 1,900 employees, either on a full-time, part-time or casual basis.

Quest generally receives franchise fees and marketing fees from franchisees for the right to use the Quest brand and systems. Franchisee owners make independent decisions regarding their hotel commercial and financial strategy and direction, operations, including employment, procurement, and other systems and services.

## Supply chain.

### **ASCOTT**

Ascott maintains a large global supply chain comprised of numerous procurement categories including:

- corporate services;
- food and beverage;
- furniture, fixtures and equipment for hotel development and refurbishment;
- information technology infrastructure and services;
- professional services including legal, tax, accounting, audit and insurance providers; and
- operating supplies, equipment and hotel amenities.

### **QUEST**

Quest engages suppliers throughout its business, specifically to support Quest's company-owned hotels (of which there are only a few) and franchise network in various procurement categories, including:

- property and facilities (e.g. furniture and fixtures);
- operating supplies and equipment;
- hotel amenities;
- food and beverage services;
- information technology; and
- corporate services.

Franchised hotels control their own independent supply chain, hence our involvement with franchised hotels is indirect. We require the franchised hotels to comply with the franchise agreements terms which includes compliance with all applicable laws and specifically, the Modern Slavery Act and any modern slavery policy issued by us.

While procurement generally occurs at local hotel level, Quest provides details of its preferred suppliers to franchisees through its Core and Preferred Supplier Policy. This Policy contains a list of both preferred and mandatory contractors across various geographic regions for procurement of goods and services from predominantly Australian-based suppliers.

Other procurement is managed by Quest's head office such as arranging furniture, fixtures and equipment prior to a new Quest hotel opening.



# Our modern slavery risks.

We acknowledge that the hospitality industry carries high risks of modern slavery, particularly due to the prevalent presence of migrant labour in its workforce. We remain committed to assessing of modern slavery risks across our operations and supply chains to deepen our understanding and mitigate the risk of causing, contributing to, or being directly linked to modern slavery.

As a large organisation, our supply chains span multiple borders and jurisdictions to source the products and services we need, which increases our exposure to both local and international modern slavery risks. Despite this, we prioritise and strive to engage with suppliers based locally in Australia, whenever possible.

## Approach to risk assessment

We maintain a risk-based approach to assessing modern slavery risks across our operations and supply chain. Our assessment considers various factors, including geographic locations, industry-specific risks, the nature of products and services sourced, annual spend, and the supply chain model.

We recognise that the hospitality industry generally has the following vulnerabilities:

- migrant workers in high risk or vulnerable populations;
- use of contractors or service providers including labour hire and outsourcing or third-party contracting arrangements;
- use of overseas suppliers / vendors or suppliers which may operate in high-risk geographic areas; and
- increased global operations which create a risk relating to forced labour and modern slavery.

We acknowledge the potential risks of modern slavery practices inadvertently occurring within our extended operations and supply chains. However, we are committed to enhancing our understanding and increasing transparency through ongoing efforts.

We have enhanced our approach to assessing modern slavery risks associated with our operations and supply chains by establishing a dedicated working group comprising of key representatives from procurement, ESG, Franchise Operations, People & Culture and Legal (**Working Group**). The Working Group aims to collaborate across functions to identify, assess and mitigate modern slavery risks, enhance due diligence processes and drive continuous improvements in transparency and ethical practices across our operations and supply chain.

# Actions taken to address modern slavery.

## Operations and Governance.

We are committed to maintaining the highest level of integrity and honesty throughout all aspects of our business, and we expect our business partners including suppliers and vendors to respect and adhere to such practices in the operation and management of their business.

### NON-FRANCHISED & MANAGED

#### *Governance processes*

As part of our roadmap for effectively preventing modern slavery in our non-franchised and managed operations, we established internal processes to regularly review and audit actions addressing modern slavery risks. This includes ongoing engagement and feedback across key departments, such as the Legal, People & Culture and Operations departments.

#### *Working Group*

The establishment of a Working Group has allowed us to comprehensively assess risks across our operations and supply chain, implement effective strategies and ensure continuous monitoring. Through regular meetings and discussions, the Working Group has been instrumental in driving our efforts to enhance transparency and improve due diligence processes throughout our business.

### FRANCHISED

While franchised hotels independently control their supply chain, we continue to support the franchised hotels by providing resources to educate, raise awareness and clearly communicate our expectations. We endeavour to keep the franchising staff well-informed about our Modern Slavery Policy through education such as online modern slavery training modules and delivering presentations on the relevance and importance of complying with the modern slavery laws, at relevant events involving the franchisees (for example, Franchising Roadshow, held twice a year). The franchised hotels have access to our Core and Preferred Supplier Policy, which assists with mitigating risks in areas where our visibility and oversight over franchised hotels' operations and supply chains may be limited.

We continue to provide our previously developed modern slavery training program (**Training**) to the franchisees.

### POLICIES

Our assessment of modern slavery risks in our operations and supply chains has also been carried out

against the background of our existing policies and procedures aimed at ensuring a safe and fair working environment for our staff and suppliers. These include:

- **MODERN SLAVERY POLICY**

This policy outlines our approach to mitigating modern slavery practices including by requiring that all persons (such as employees, contractors, directors or those seeking to have business relationships including suppliers), identify risks within our operations and supply chain and take steps to address and/or remediate these.

- **WHISTLEBLOWER POLICY**

This policy is designed to promote and support a culture of honesty, integrity and ethical behaviour including by encouraging reporting of actual or suspected misconduct by eligible whistleblowers.

- **CODES OF CONDUCT**

Our codes of conduct sets out our expectations of behaviour and conduct by our employees, officers, contractors, franchisees and suppliers

- **WORKPLACE BULLYING, DISCRIMINATION AND HARASSMENT POLICY**

This policy and procedure include our obligations in respect of bullying, harassment, discrimination, victimisation and vilification. It establishes procedures and processes for making complaints and applies to all employees, directors, officers, contractors, suppliers and visitors.

- **WORKPLACE HEALTH AND SAFETY POLICY**

This policy promotes the creation and maintenance of the highest standards of health and safety in the workplace and to promote a productive and enjoyable environment for all.

- **CORPORATE OFFICE GENDER EQUALITY, FLEXIBILITY AND DIVERSITY POLICY**

This policy aims at supporting and encouraging workplace participation by persons of different genders at Ascott and Quest. Corporate Ascott and Quest employees are provided with additional leave entitlements and other benefits. Through this, we aim to reduce the effect of systemic causes of gender inequality which commonly arise in workplaces and to promote and encourage the achievement of gender quality in the workplace.

- **DIVERSITY AND INCLUSION POLICY**

Ensures a fair and inclusive culture and to build a workforce that reflects the diversity of our communities.

In addition to all of the above, we are also subject to CapitaLand's policies and procedures including Environmental Health and Safety Policy and Grievance Handling Procedure.

## **EMPLOYEES**

- **Modern Slavery Policy and Training**

We developed a Modern Slavery Policy in 2024 and continue to provide copies of this policy to our employees, contractors and other staff working on our behalf.

In addition, we have also provided our corporate employees with modern slavery training and continue to encourage the report of any suspected misconduct or breach of our Modern Slavery Policy or any other policies and procedures. Specific procedures to do so are set out in our established Modern Slavery Policy.



Our modern slavery training is conducted annually. It is our focus and priority to continuously bolster participation rates through enhancing internal communication with our corporate employees.

- **Employment policies, processes and procedures**

We have procedures in place to ensure we adhere to the applicable employment laws in our business operations. We are committed to being a fair and transparent workplace.

We are dedicated to fostering a culture and atmosphere where our people feel empowered to express their concerns or grievances without fear or reprisal. The precise procedures and process can be found within our established workplace policies and procedures.

## Supply chain.

### **Suppliers Code of Conduct**

In our first reporting year, we implemented a Supplier Code of Conduct which suppliers of non-franchised and managed properties are required to sign up to.

### **Quest's Core and Preferred Suppliers**

Suppliers listed in Quest's Core and Preferred Supplier list for franchised properties are bound by the Supplier Code of Conduct. The Supplier Code of Conduct sets out our expectations on our suppliers to comply with all applicable laws, including compliance with modern slavery laws, relevant anti-bribery and corruption laws, and health and safety laws and the obligation to act ethically and uphold integrity.

### **Contracts**

We have also incorporated specific prohibitions against modern slavery practices in our supplier contract templates for non-franchised and managed properties, including the ability for us, if required, to terminate contractual arrangements where suppliers engage in such practices.

### **Modern Slavery Questionnaire and Pre-Qualification Supplier Questionnaire**

In the previous financial year, we developed a Modern Slavery Questionnaire and Pre-Qualification Supplier Questionnaire (**Questionnaire**) to help identify areas of our supply chain that may carry modern slavery risks, enabling us to focus our efforts on those areas. The Questionnaire is designed to provide a deeper understanding of a supplier's operations and supply chain. We continued our due diligence efforts with suppliers for non-franchised and managed properties, distributing the Questionnaire to existing suppliers and gather essential procurement information.

We continued to focus on engaging our suppliers to improve their responses to our Questionnaire. The data obtained from these Questionnaire is intended to be used in future efforts to gain insights into the measures our suppliers have implemented to ensure modern slavery is not occurring.

We reviewed and updated our new supplier contracts following an analysis of our list of suppliers, to include contractual clauses requiring compliance with the applicable modern slavery laws. In addition, we provided our suppliers with our Modern Slavery Policy to clearly demonstrate our clear position to minimise and eradicate modern slavery and our expectations on our suppliers to do the same.

In respect of suppliers, we will centralise procurement for managed and non-franchised properties and endeavour to centralise some procurement for franchisees through the Core and Preferred Supplier Policy.

# Assessing the effectiveness of our actions.

## Ascott & Quest.

As part of our long-term strategy, we are dedicated to continuously improve and enhance our existing policies and processes and refine our approaches to mitigate modern slavery risks.

As we are still in the early stages of our journey, we are focused on building on the foundations we have laid as described in our statements.

### SUPPLIER ASSESSMENTS

Through the distribution of our Questionnaire, Supplier Code of Conduct and Modern Slavery Policy to our newly engaged or renewed suppliers, they are made aware that compliance to our Supplier Code of Conduct and the applicable modern slavery laws are non-negotiable.

If we become aware of any actual contraventions or attempts to contravene modern slavery laws by our suppliers whose contracts include our modern slavery contract clauses, these suppliers understand that they are expected to notify us and we would be able to engage with them to take appropriate next steps to address such contraventions, or if required, terminate the contract.

### ASSESSING QUEST FRANCHISED NETWORK

As employees and suppliers are employed and chosen by the franchised hotels, these fall outside of our direct influence. We provide recommendations, policies and other tools, such as training to raise awareness amongst the franchised hotels and to communicate our expectations before the franchised hotels engage a supplier or employ new employees, which assists franchised hotels in meeting their obligations under the franchise agreement.

In the previous financial years, we have made available modern slavery training to our franchised hotels through our Concierge webpage which serves as a comprehensive repository of all essential information for the franchised hotels.

### CORPORATE RECOGNITION

Our continued dedication and endeavours to promote gender equality are evidenced by our recognition as:

- Winner of 2025 Franchise Industry Awards for Franchisor Excellence in Equality, Sustainability & Governance
- winner of the 2023 Recalibrate Gender Equity Awards for the SME Business category
- 5<sup>th</sup> Best Place to Work in the over 100 employees category at the 2024 Best Places to Work Conference and Awards

We continue to:

- assess the effectiveness of our governance structure including by adopting further relevant policies and procedures, where necessary to address modern slavery risks in our operations and supply chains.
- work collaboratively with our people and partners to understand the challenges and successful stories (and build on those) which will in turn, help us learn what we can do moving forward to better improve our current policies and processes.

# Further information.

## Environmental, Social and Governance.

Ascott’s Sustainability Program known as ‘Ascott Cares’ is an initiative launched by our parent company in Singapore, the goals of which we aim to align ourselves with. A copy of Ascott Cares is available on request.

Quest’s Environmental, Social and Governance (**ESG**) strategy recognises the brand’s core values, as well as our responsibility in today’s world. We understand, embrace and commit to making a positive impact through three key pillars: Environmental Action, Diversity and Inclusion and Community Involvement. A copy of our ESG strategy is available on request.

## Values.

Broader Ascott values underpin this Statement:



Quest values also underpin this Statement:

## Our Values



**MUTUAL RESPECT**  
We may disagree but we act in accordance with our values.



**ONGOING RELATIONSHIPS**  
We build trusting, mutually beneficial long-term relationships.



**UNDERSTANDING**  
We seek to confirm another person’s perspective.



**ALIGNMENT**  
We work together to achieve common goals.



**PERSONAL BEST**  
Everything we do, we do to the best of our ability.



# Awards.

We have won a number of awards in recent times, the following are the achievements and accolades received in 2024 and 2025:

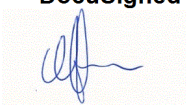
- Franchisor Excellence in Equality, Sustainability & Governance – Franchising Council of Australia
- Franchisor Diversity and Inclusions – Franchising Council of Australia
- Travel Tourism and Hospitality Team of the Year – Lawyers Weekly Corporate Counsel Awards
- FRANData – 5 Star Franchisee Rating
- Hotelier of the Year
- Highly Commended by Kevin Goh – HM Magazine Global
- Service to the Community – Quest Apartment Hotels by HM Magazine Global
- Restaurant and Bar Design Awards – Bar Lettera
- Sustainability Program – Hotel for Trees by HM Magazine Global
- Innovative Collaboration Award – HM Awards

# Consultation.

Ascott and Quest consulted with other related entities and subsidiaries within the group of companies to prepare this Statement.

Whilst it does not own or control franchisees, given they are separate legal entities, we endeavour to consult with franchisees through written updates and by way of conference updates.

This Statement was approved by the Board of Directors of  
the Ascott International Management (Australia) Pty Ltd on 30 June 2025

**DocuSigned by:**  
  
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**David Mansfield**  
Managing Director  
Ascott International Management (Australia) Pty Ltd

# Compliance table

We have prepared this Modern Slavery Statement following the seven reporting criteria outlined in the *Modern Slavery Act (Cth) 2018*.

The below table sets out the main location of the information for each criterion.

CRITERIA	LOCATION OF INFORMATION
Identify the reporting entity	2
Describe the reporting entity's structure, operations, and supply chains	4 – 5
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	6
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	7 – 9
Describe how the reporting entity assesses the effectiveness of these actions	10 – 11
Describe the process of consultation with any entities the reporting entity owns or controls	14
Provide any other relevant information.	12 – 13

