



# STAKEHOLDER GRIEVANCE POLICY

Version 1.0



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## Version controls

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## 1. Introduction

Intrepid Travel is committed to respecting and upholding all internationally recognised human rights. We align our approach with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the Universal Declaration of Human Rights, and we actively participate in the United Nations Global Compact.

We conduct ongoing human rights due diligence to identify, prevent, mitigate and address actual or potential adverse human rights impacts connected to our operations, supply chains and destinations. Where Intrepid causes or contributes to negative impacts on the rights of individuals or communities, we are committed to enabling access to effective remedy through appropriate and accessible grievance mechanisms.

Intrepid's grievance channels are available to all employees, tour leaders, contractors, suppliers, partners in our value chain, travellers, local communities, civil society organisations, and any other stakeholders who have legitimate concerns about actual or potential adverse impacts linked to our business activities. We are committed to promptly and impartially investigating concerns raised, and to providing fair and appropriate remediation, either directly or in collaboration with relevant partners and stakeholders.

Our grievance handling mechanisms and procedures are guided by Pillar III of the UN Guiding Principles on Business and Human Rights and are designed to meet the effectiveness criteria for nonjudicial grievance mechanisms set out in Principle 31 of the UNGPs. This policy outlines our grievance channels, handling procedures and guiding principles, and establishes a consistent and objective framework for managing all grievances raised with Intrepid,

in line with applicable international standards, local laws and regulations.

Intrepid's grievance mechanisms complement broader engagement and accountability processes, including regular staff engagement, training, destination risk assessments, supplier audits, and ongoing dialogue with local communities, unions, NGOs and other external stakeholders. To ensure the continued effectiveness and relevance of our grievance mechanisms, we commit to ongoing consultation with internal and external stakeholders and to reviewing and updating this policy as needed.

## 2. Definitions

**Grievance** — A concern or complaint about the company's (actual or potential) social, environmental, or governance issues that a stakeholder raises to the company. A grievance is often submitted through the company's grievance procedure.

**Grievance procedure** - A process the company makes available for stakeholders negatively affected by its business activities to raise concerns. The company uses the grievance procedure to manage and resolve such formal complaints in a fair, independent, and transparent way. Grievance procedures are sometimes called "grievance mechanisms", or "redress" or "accountability mechanisms".

**Grievance raiser** - A stakeholder who files a grievance against the company.

**Grievance defendant** - The individual, department, or the company itself against whom a stakeholder has filed a grievance.

**Human rights defender** - Is defined by the Office of the United Nations High Commissioner for Human Rights as "people who, individually or with others, act to promote or protect human rights in a peaceful manner". Human rights defenders include affected communities, NGOs as well as

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individuals such as journalists, lawyers, judges, academics, government officials, civil servants, campaigners or employees such as whistleblowers.

**Remediation** - Refers to both the process of providing a remedy for negative human rights impacts and the substantive outcomes that can address or mitigate the negative impacts. Its aim is to restore the rights of individuals or groups when harm has occurred and to prevent reoccurrence.

## 3. Scope

This policy applies to all grievances reported via Intrepid's channels. Although Intrepid has various channels through which all stakeholders are able to directly report their grievances, partners doing business with Intrepid are expected to operate their own grievance handling mechanisms within their business operations and supply chain, and to observe Section 5 of this policy, on "Principles of Grievance Handling". It is important to note that if it is a workplace issue that is being raised as a grievance, Intrepid people should refer to the Global Grievance Policy in the People Policy Portal. This umbrella policy applies to environmental, social or governance grievances raised by:

- Employees and contractors
- Suppliers, DMCs, and supplier workers
- Customers and travellers
- Community members and partners
- Civil society organisations and media

## 4. Grievance channels

Intrepid operates a wide range of grievance channels across the organisation, both globally and locally, to receive grievances from internal and external stakeholders.

A complainant may report a grievance anonymously or choose to be identified. Intrepid is committed to upholding the confidentiality of the grievance and protecting the complainant in all cases. At the same time, we do not tolerate retaliation against the complainant in response to filing a grievance. Reported grievances are assigned to different organisational departments based on the nature of the grievance and, if necessary, several organisational units work together toward effective remedies.

Stakeholders can raise grievances via:

- Online feedback form (public)
- Email (dedicated grievance address)
- Through Intrepid staff, leaders, or partners
- Safeguarding and whistleblower channels (where relevant)

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## 5. Grievance channels for different categories of stakeholders

| Organisation Team                             | Stakeholders   | Related Policies   | Grievance Channels and Scope of Grievance for Stakeholders to Utilise  | Communication Channels to Stakeholders  | Reported on to whom   |
|---|--|--|--|---|---|
| People Team                                   | Applies to all permanent, contractors and temporary employees of Intrepid and all its related entities | <ul style="list-style-type: none"> <li>Global Grievance Policy</li> <li>Global Whistleblower Policy</li> <li>Policy on Prevention of Discrimination, Bullying &amp; Harassment</li> <li>Sexual Misconduct Policy</li> <li>Bribery &amp; Corruption Policy</li> <li>Global Human Rights Policy</li> <li>Code of Conduct</li> </ul>  | <ul style="list-style-type: none"> <li><b>Channel(s):</b> Hotline, online (Email, Forms, Surveys), In-person</li> <li><b>Language(s):</b> English</li> <li><b>Scope of grievances:</b> All grievances related to our business operations, including but not limited to:                             <ul style="list-style-type: none"> <li>All human rights violations (e.g. child/forced labour, harassment, discrimination, health and safety risks)</li> <li>Working conditions (e.g. overtime work wage violations)</li> <li>All country offices Intrepid Travel across the world operate grievance channels.</li> </ul> </li> </ul> | <p><b>Channel(s):</b> Related policies are hosted on the global policies SharePoint page for people to read and on the operations external portal. Mandatory compliance training.</p> | <p><b>Formal Complaints Reporting:</b> Tracked locally by People team representatives.</p> <p><b>Legal Cases Reporting:</b> CPPO</p> <p><b>Legal Cases with Material Financial Implications:</b> ARC and CMT</p>  |
| Country Office, Customer Care and Legal Teams | Customers  | <ul style="list-style-type: none"> <li>Policy on Prevention of Discrimination, Bullying &amp; Harassment</li> <li>Sexual Misconduct Policy</li> <li>Community Guidelines</li> <li><u>Leader &amp; Crew Policy</u></li> <li><u>Managing unacceptable traveller behaviour</u></li> <li><u>Managing traveller cognitive &amp; physical ability</u></li> <li><u>On trip complaints</u></li> <li><u>LGBTQIA+ Policy</u></li> <li><u>Accessibility Guidelines</u></li> <li>Customer Care SOP - Complaint Case</li> </ul> | <ul style="list-style-type: none"> <li><b>Channel(s):</b> Hotline, online (Email, Forms, Survey), in-person</li> <li><b>Language(s):</b> English</li> <li><b>Scope of grievances:</b> Grievances including but not limited to:                             <ul style="list-style-type: none"> <li>All human rights violations (e.g. harassment, discrimination, health and safety risks)</li> </ul> </li> </ul>  | <p><b>Channel(s):</b> Clause 18 and 22 of the Booking Conditions on the website &amp; community guidelines in the ETI of trips</p>  | <p><b>Complaints Reporting:</b><br/>Pre trip – Complaints are tracked at the level of refunds.<br/>On trip – incident management system &amp; ops team – operations monthly report to senior managers &amp; CMT<br/>On trip/post trip – customer care team – customer care quarterly and annual report to business, senior managers &amp; CMT</p> <p><b>Legal Cases Reporting:</b><br/>Legal team –</p> |

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|   |                       |   |   |  |   |
|---|-----------------------|---|---|--|---|
|   |                       | <ul style="list-style-type: none"> <li>Customer Care- How to investigate Customer Feedback</li> <li>Customer Care - How to offer compensation</li> <li>CCS SOP Customer Care Supervisor - Managing On Trip Complaints</li> </ul>                                      |   |  | <p>Escalated matters from Customer Care or formal claims are recorded internally and presented to ARC quarterly</p> <p><b>Legal Cases not meeting the Material Financial Threshold:</b> CFO<br/>Legal Cases with Material Financial Implications: ARC and CMT</p> |
| Global Procurement and Country Office Procurement Teams | Suppliers             | <ul style="list-style-type: none"> <li>Global Whistleblower Policy</li> <li>Policy on Prevention of Discrimination, Bullying &amp; Harassment</li> <li>Sexual Misconduct Policy</li> <li>Bribery &amp; Corruption Policy</li> <li>Supplier Code of Conduct</li> </ul> | <ul style="list-style-type: none"> <li><b>Channel(s):</b> Hotline, Email and In person</li> <li><b>Language(s):</b> English</li> <li><b>Scope of grievances:</b> Grievances including but not limited to: <ul style="list-style-type: none"> <li>Grievances arise from business relations with Intrepid and working environment at partner companies</li> </ul> </li> </ul> | <b>Channel(s):</b> Supplier engagement newsletter and conferences, plus Supplier Code of Conduct | <p><b>Concerns/Complaints Reporting:</b><br/>Aggregated for trends and reported to CMT</p> <p><b>Legal Cases Reporting:</b><br/>Legal team – aggregated matters are reported to ARC</p>   |
| Global Impact Team                                      | External stakeholders | <ul style="list-style-type: none"> <li>Responsible Travel Policy</li> <li>Animal Welfare Policy</li> </ul>  | <ul style="list-style-type: none"> <li><b>Channel(s):</b> Email: responsible.business@intrepidtravel.com &amp; accountability@intrepidtravel.com, and customer feedback form</li> <li><b>Scope of grievances:</b> All grievances related to our business operations, including social and environmental impacts</li> </ul>  | <b>Channel(s):</b> Responsible Travel Policy and Ethical Marketing Guidelines                    | <p><b>Concerns/Complaints Reporting:</b><br/>Aggregated for trends and reported to CMT</p> <p><b>Legal Cases Reporting:</b><br/>Legal team – aggregated matters are reported to ARC</p>   |

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## 6. Grievance handling procedure

Intrepid promptly and carefully reviews all grievances it receives and is committed to providing fair and effective remedies. Again, for workplace related grievances and triage processes, please refer to the Global Grievance Policy in the People Policy Portal. For other related grievances, they are generally processed in the order of when they are received, higher-priority complaints are dealt in an urgent manner due to their severity in line with the UNGPs rationale, considering that delayed responses could lead to irremediable harm.

The grievance procedure consists of four steps:

- Receipt and acknowledgment (within seven days) and escalation verification
- Investigation, notification, and resolution - and the goal is to handle and close grievances within three months. However, due to the complex nature and multi-stakeholder related issues, resolution can take longer but will always be communicated to the complainant.

However, depending on the characteristics of the grievances such as where the grievance involves external stakeholders or possible violation of the law, the procedure may take more than three months and there may be changes to the procedure. Additionally, the company may close an ineligible grievance such as where the facts cannot be verified or where the grievance is unfounded, exaggerated or deceiving. In such cases, the grounds for closing the grievance will be communicated. Furthermore, the company may reinvestigate the closed case only when reasonable grounds are provided.

### Receipt: receive the grievance

- Assign an organisational team and person in charge of Intrepid to be responsible for managing the grievance handling process per

Section 4 above. Ensure there is no conflict of interest among any of the organisational/investigating team.

- Inform the complainant within seven days that the grievance has been successfully received and explain the next steps in the process. Use appropriate communication methods, such as email, to provide this notification.

### Investigation: verify and investigate the grievance

- Verify the grievance and facts to determine their eligibility (e.g. via document reviews, interviews).
- Engage with the complainant about the desired remedy and start the investigation.
- If necessary, conduct interviews with individuals who can provide insights into the case such as the respondent or witness(es), complying with principles of confidentiality and non-retaliation in mind.
- If necessary, with consent from the complainant, a third-party expert is brought into the process.

### Notification: design remediation plan and notify the outcome of the grievance to the complainant

- If a grievance is substantiated, Intrepid will design and implement a remediation action plan proportionate to the nature, severity and impact of the grievance, taking into account the complainant's desired outcome where appropriate.
- For grievances of greater severity, Intrepid's Audit and Risk committee shall discuss the remediation action plan and any other relevant measures, including measures to address harm, prevent recurrence and strengthen systems where needed.

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- Seek feedback from participants on the process and investigation.
- Inform the complainant of the investigation and remediation action plan.

\* Information shall be shared with the complainant to the extent possible in accordance with local laws such as privacy laws and to the extent it does not violate the rights of others.

## **Resolution: implement and monitor the agreed remedial measures**

- Where the respondent is an employee of Intrepid, remedies may incorporate reconciliation, disciplinary action and dismissal of the respondent that comply with internal policies, including the rights of workers to defend themselves against the allegations.
- Where the respondent is Intrepid or a specific office or department of the company, remedies may include outcomes outlined under "Remediation" in Section 6 of this policy.
- Where the respondent is outside of Intrepid, remedies may vary depending on factors such as the severity of the grievance and the level of external involvement in remediation.

## **7. Principles (UNGP aligned)**

Intrepid is committed to complying with the following principles throughout the entire procedure to handle grievances reported via our internal grievance channels and third-party channels.

- **Direct Settlement of Complaints:** Generally, it is recommended to try first to settle grievances directly between the affected parties. Where this has failed or where the grievance itself makes the direct settlement impossible or inappropriate, a complainant

shall raise it through a formal grievance channel.

- **Alignment with UNGPs Effectiveness**

**Criteria:** In accordance with Principle 31 of the UNGPs, Intrepid is committed to providing effective grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent and rights compatible as well as a source of continuous learning and based on engagement and dialogue. This includes but is not limited to operating grievance channels in various languages, eliminating factors that hamper the accessibility of the channels, providing a gender lens to the grievance handling procedure and handling reported grievances for fairness.

- **No Retaliation:** Intrepid respects the rights of complainants in good faith to file a grievance without any fear of retaliation, intimidation, disadvantage or punishment for filing a grievance. We also provide confidentiality and anonymity during the investigation process to prevent risks of retaliation. Complainants or witnesses who believe they are being retaliated against for filing a grievance should immediately raise their concerns with the company. Intrepid is committed to investigating and addressing such complaints promptly and impartially.

- **Support of Human Rights**

**Defenders:** Intrepid recognises the importance of promoting and protecting the human rights of human rights defenders and does not tolerate nor contribute to any threats, intimidation or physical attacks against them. We are committed to constructively communicating and consulting with human rights defenders who raise concerns on the human rights impacts of our business activities.

- **Maintaining Confidentiality and the Rights to Privacy:** Intrepid is committed to maintaining strict confidentiality of

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grievances, and verbal and written information provided by the complainant and related parties with respect to the rights of privacy and data protection. There are internal guidance and processes in place to avoid exposing any information that may identify the complainant without gaining the complainant's explicit consent. Only when it is necessary for investigation purposes, related information will be disclosed to the relevant personnel in compliance with applicable legal obligations.

- **Guaranteed Participation in External Grievance Mechanisms:** Intrepid respects the rights of a complainant to participate in or to utilise other judicial and non-judicial grievance processes. Intrepid does not interfere with or obstruct their rights to do so and is committed to collaborating with state-based judicial and non-judicial mechanisms as needed.
- **Remediation:** If Intrepid causes or contributes to a human rights issue, we will provide appropriate remedies through legitimate processes and cooperate with third parties as needed. A decision on the outcome of the grievance is made by taking the complainant's desired remedy into account. Effective remediation may include apologies, restitution, rehabilitation, financial or non-financial compensation and punitive sanctions, as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition. Intrepid can dismiss grievances if deemed frivolous, malicious, and vexatious.

## 8. Implementation and effectiveness of Grievance Mechanism and Remediation

Intrepid recognises and utilises grievance channels as an effective human rights due diligence tool and early warning system to detect adverse impacts on human rights. Intrepid's grievance mechanisms are part of our wider due diligence process. Our findings from grievance handling are incorporated into the process of setting our strategic plans to prevent and mitigate adverse impacts on human rights. Our materiality assessment incorporates trends from grievance procedures that have occurred over that time.

Annual grievance reporting:

- details the grievances
- evaluates effectiveness of procedures
- identifies trends
- recommends improvements

Overall, our grievance channels serve as a source of information that is used to enhance the quality of human rights due diligence, making our efforts to prevent and mitigate human rights-related risks more effective.

Relevant teams and professionals are in charge of operating grievance channels, handling cases, providing effective remedial measures and monitoring the actual implementation. The Chief People and Purpose Officer is responsible for presenting the annual internal summary to the central management team.

All Intrepid employees are trained to be aware of existing global and local grievance channels, reporting methods, and their rights to access to remedy via on boarding and annual human rights training, posters and other advocacy communication. In addition, the regular training for persons in charge of handling grievances focuses on effective grievance management. The training is conducted at the country office level in consideration of different characteristics of countries and subsidiaries. Channels available to

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external stakeholders are communicated via online platforms.

Intrepid's suppliers are expected to have their own grievance channels in place in alignment with Intrepid's commitments and Intrepid is committed to collaborate with suppliers to address grievances.

Intrepid strives to listen to the opinions of various stakeholders to provide fair and effective grievance handling procedure. In addition, during on-site supplier inspections or compliance management workshops, we invite employees of our partner companies to share feedback through interviews on how Intrepid can improve its grievance handling procedures, including the effectiveness of our hotline system. Furthermore, we regularly collect all filed cases and analyse trends to identify the root causes of adverse impacts to prevent recurrence via policies and processes. These monitoring and evaluation activities are planned and executed individually by the country, subsidiary, and responsible organisational team of Intrepid. We publish aggregated grievance data on a regular basis aligned with UNGP Effectiveness Criteria, including:

- number, nature and types of grievances
- number of completed cases, outcomes, average duration
- stakeholder satisfaction

