## Business and Human Rights Resource Centre Hotel companies in the Gulf: 20 questions on human rights

## **Hilton Response**

Hilton is committed to conducting business in a way that respects the rights of our guests, Team Members, business partners and local communities, balancing the long-term sustainability of our business with their social, economic and sustainability needs. We are signatories to the United Nations (UN) Global Compact, and our approach is informed by the UN Guiding Principles on Business and Human Rights. We continually evaluate human rights risks and strengthen our due diligence process by integrating findings back into our policies and procedures We have outlined our commitment to human rights, good governance and ethical conduct in our <u>Global Code of Conduct</u>. Hilton Team Members are expected to maintain these standards. We are committed to working with and encouraging our business partners to uphold similar principles, and to adopt similar policies within their businesses. In 2015 we published our <u>Responsible Sourcing Policy</u>, and in May 2016 we released our <u>Human Rights Policy Statement</u>.

## Overview of Hilton's human rights policies and procedures

In 2015, we completed a human rights impact assessment across our global business activities. This assessment focused on the risk that our business operations may pose to individuals' rights in terms of severity and likelihood. Our assessment identified labor rights, trafficking, privacy rights and land rights as areas deserving of additional attention, starting with a need for internal training and awareness raising, followed by internal processes changes to better identify and manage these risks. Public reporting on our work will be included in the next edition of our <u>annual corporate responsibility report</u>, and in our statement to the United Kingdom (UK) Modern Slavery Act, which we are due to publish in the second quarter of 2017.

Hilton makes an effort to influence business partners by raising expectations and awareness of related risks. Our <u>Responsible Sourcing Policy</u> outlines the standards expected of Hilton suppliers related to human rights and other areas.

Hilton is also committed to working with and encouraging our owners and franchise partners to uphold the principles of our Human Rights Policy Statement, and to adopt similar policies within their businesses.

In addition to its responsible sourcing and human rights policies, Hilton also raises awareness of these issues through its Code of Conduct, its corporate responsibility reporting and training programs. . Our Anti-Trafficking training webinar is made available to all hotels globally (including franchise hotels).

## **Qatar-specific human rights work**

Hilton does not build hotels; we work with our hotel owners across the world. Hilton currently manages three hotels in Qatar: Hilton Doha, DoubleTree by Hilton Doha Old Town, and AlRayyaan Hotel Doha, a Curio collection by Hilton, all of which are owned by independent ownership groups.

Hilton is not involved in the sourcing of labor for construction of hotels or related facilities. In Qatar, for the operation of our hotels, Team Members are legally employed by the ownership company of each

hotel. As a management company, Hilton leads on the recruitment and management of Team Members working at the hotel once opened and operating. In this capacity, Hilton is committed to ethical recruitment, through its web portal or recruitment agencies, and employment practices and follows its own internal policies on recruitment and employment to the extent it is empowered and engaged to do the same under its contracts:

- Agency fees, travel costs, visas and local medical checks are paid by the company. Only medical
  checks in a potential employee's original location or home country are not paid by the company.
   We have a provision in our contracts with labour agencies on not charging recruitment fees.
- All employees are provided with an offer letter and employment contract detailing their terms and conditions of employment, which they receive at their address in their home country.
- Hilton does not keep employees passports, only copies. The only time passports are kept is during the residential permit application process.
- Salary is paid on a monthly basis and in line with the local law, with a scale that applies to all Team Members, regardless of nationality or other characteristics. Overtime is compensated at a higher rate.
- Thorough training is delivered by the Human Resources teams on health and safety, injury
  prevention, working hours and overtime, prevention of abuse, and cultural awareness. These
  topics are also addressed in the Code of Conduct, Human Rights Policy, Workplace Health and
  Safety Policies, Recruitment Policies, and Employee handbook given to new Team Members.
  Code of Conduct training is mandatory for all new Team Members.
- Team Member accommodations are built to Hilton standards and are managed by Hilton.
- Team Members can raise any grievance with their managers or anonymously on the Hilton Hotline, which is administered by an independent third party that collects information for transmission to the Hilton Compliance Team.

In 2016, we established two working groups to (1) review our policies and procedures with recruitment and labour agencies in the Middle East, and (2) to develop and share good practices on worker welfare to support our owners in conducting their own due diligence with their appointed construction companies.

Hilton recognizes that addressing human rights issues with respect to recruitment and labour agencies and construction companies is a shared industry challenge. We are working collaboratively through the International Tourism Partnership to raise awareness, share best practice, and develop positive mitigation tools.