

## Hotel Companies in the Gulf – Whitbread Response

### Human Rights Overview

#### Introduction

Whitbread's human rights in the supply chain due diligence is driven by our [Responsible Sourcing Policy](#) which is aligned to the ETI base code, ILO Convention and the UN Guiding Principles on Business and Human Rights.

We also have a wider Human Rights Policy which speaks to our most salient human rights risks, and is supported by a robust due diligence and remediation system to manage those risks effectively.

#### Risk Assessment

We have undertaken a risk assessment to identify our salient risks and design our strategy for responding to them. Senior leaders were involved in the process of risk assessment, and it is vital that they show leadership on the issue and are aware of the significance of human rights issues across our business and supply chain and are now working with key stakeholders to develop output into Policy.

#### Procurement processes

Our core procurement process integrates the Responsible Sourcing Policy to ensure it is communicated effectively with our suppliers and partners. The Policy is implemented across our global supply chain to all suppliers, including construction, contractors and labour providers. We measure supplier performance against the Policy standards through our due diligence system (cr360) which all suppliers are required to register on. This process is on-going and enables capture of their acceptance of and signature to our policies, key performance and compliance information (including evidence-based verification) and management of improvement action plans.

#### Assurance

We undertake third party, independent ethical audits (to the SMETA standard) for higher risk suppliers as a priority. High risk suppliers are identified through risk ratings generated by cr360 and further through a global supply chain analysis recently completed with Stop The Traffik to identify higher risk areas for modern slavery. Our work now focuses on developing and implementing a response or remediation to that risk. Our strategy is aligned to the Ethical Trading Initiative's (ETIs) human rights due diligence framework.

### Dubai

We have a small, but growing business in the Middle East which operates as a Joint Venture between Premier Inn Hotels LLC and The Emirates Group. Premier Inn Hotels LLC, owned by Whitbread is the minority partner. We have been working over the past year to understand what our existing due diligence processes are in the Middle East with the ambition to create a sustainability strategy to address any areas of risk in the coming year.

We currently have four properties in Dubai, one is a managed property and the other three are operated by Premier Inn Hotels LLC. The food and beverage offer is operated by Emirates Retail & Leisure, a subsidiary of Emirates.

The recruitment and all other HR processes of our Premier Inn team members (housekeeping, reception, and hotel management) is completed by the joint venture's HR team in Dubai. In addition, the JV provides accommodation for team members who are employed by Premier Inn Hotels LLC. As part of this process, Premier Inn pay the charges and costs associated with recruitment (agency fees, travel costs, visas and medical checks).

We are committed to respecting human rights wherever the Whitbread businesses operate. We have made good progress across our global supply chain and are now in the process of developing our strategy for addressing associated risk with our international business.