

Whitbread plc Human Rights Policy

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| Document Version: For Release |
| Date of drafting: Q1 2010 |
| Date of release: Q2 2010 |
| Date of last review: N/A |

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1 Context

Whitbread recognises its responsibility to ensure sound social, ethical and environmental practices within its own operations, and within its supply chain, in every market in which it operates. We acknowledge that every worker deserves the right to live and work with dignity.

This policy defines the basic standards of human rights that Whitbread will respect at all times and which we will expect our business partners to respect at all times. These standards of human rights also form the basis of our Responsible Sourcing Policy and our Global People Principles [currently in development].

In addition to its basis in relevant local and national legislation, this Policy is drawn from:

1. **The United Nations (UN) Universal Declaration of Human Rights**, which defines the rights every human being is entitled to, covering areas such as employment, education and dignity.
2. **The International Labour Organization (ILO)**, a UN agency whose mission is to promote rights at work; encourage decent employment opportunities; enhance social protection, and strengthen dialogue in handling work-related issues. Its conventions create the framework for ethical labour standards.

2 Whitbread's Human Rights Policy requirements

Whitbread is committed to upholding basic Human Rights and supports in full the United Nations Universal Declaration of Human Rights and the International Labour Organisation Core Conventions. We are committed to the following:

2.1 Employment:

1. We will not use forced, bonded, indentured or involuntary prison labour.
2. We will ensure that all work performed by our people will be on the basis of a recognised employment relationship established through national law and practice.
3. We will not avoid our obligations to our people under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes.

2.2 Freedom of association:

4. We recognise that our people, without distinction, have the right to join or form trade unions or other comparable, legal organisations of their own choosing and to collectively make representations to, or enter into negotiations over employment issues with their employer;
5. Where Whitbread operates in a country in which the right to freedom of association and collective bargaining is restricted under law, we will not hinder the development of parallel means for independent and free association and bargaining.

2.3 Working conditions

6. We will at all times provide a safe and hygienic working environment.
7. We will maintain a record of health and safety incidents with an action plan to improve performance by minimising the causes of hazards in the working environment.
8. We will provide regular and recorded health and safety training to our teams.
9. We will ensure all our people have access to clean toilet facilities and potable water while at work.
10. We will assign responsibility for health and safety to a senior management representative.

2.4 Child labour

11. We will comply with all relevant child labour laws and not employ workers under the age of 15 (14 in certain developing countries as designated by ILO conventions).
12. We will maintain appropriate documentation and systems to prevent taking children into our employment.

2.5 Fair wages

13. We will ensure that wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages will always be enough to meet basic needs and to provide some discretionary income.
14. We will pay overtime at a premium rate, at a minimum compliant with national legislation.
15. We will provide all our people with written and understandable information about their employment conditions in respect to wages before they enter employment.
16. We will not make deductions from wages (other than those prescribed by law) without the expressed permission of the worker concerned.

2.6 Working hours and annual leave

17. We shall ensure that working hours comply with national laws and industry standards appropriate to the role and level of seniority. In general, our people will not be required to work in excess of a basic 48 hours per week. Overtime will be voluntary.
18. We will provide reasonable annual leave to each of our people, based on a clear formal policy.

2.7 Discrimination

19. We will fully comply with local laws regarding equality of employment opportunities. Subject only to local law, we will not discriminate in hiring, compensation, training, promotion, termination or retirement based on race, caste, nationality, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

2.8 Humane treatment

20. We prohibit all forms of physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation is also prohibited.
21. We will take only fair disciplinary action, proportionate and fully compliant with local laws.

3 Implementation of the Policy

3.1 Whitbread's Commitment to Social, Ethical and Environmental Standards

Whitbread is fully committed to the principles of Responsible Sourcing and undertakes to:

- Engage its management team and employees.
- Provide appropriate training on this Policy to key employees
- Assign responsibility for social, ethical and environmental standards to named responsible individual(s) who will provide the Board, suppliers and other stakeholders oversight of policy, principles and progress as required.
- Allocate funds for the implementation of this Policy as deemed necessary.
- Review and revise this Policy on an annual basis.

Signed:



Simon Barratt, General Counsel, Whitbread plc.

We welcome any comments or questions regarding this Policy. Please contact:

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