

Human Rights Policy

WHO IS THIS FOR?

UNITED
KINGDOMREPUBLIC
OF IRELANDISLE OF
MAN

GUERNSEY



JERSEY

TEAM
MEMBERSLINE
MANAGERS

Policy Statement

Human rights are rights which we all have simply because we exist as human beings. Everyone has them, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

Whitbread is committed to respecting these rights, in line with the United Nations (UN) Guiding Principles on Business and Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

We are determined to respect human rights wherever our business may impact them, and we have a zero-tolerance approach to any breach. We have a series of policies in place, which cover functional processes throughout our organisation to ensure that we are measuring, monitoring and mitigating human rights risks.

Our approach to human rights has been developed with colleagues across our whole business. We also work collaboratively with our partners including suppliers across our global supply chain to address human rights risks and proactively work together to find ways of improving working conditions and labour standards for workers across anyone we do business with.

It's important that if human rights violations occur, we stop it happening and put things right. We have robust and confidential whistleblowing and grievance systems in place to that end. We seek to promote access to both formal and informal resolution where we are linked to or involved in violations. We will involve the authorities and legal enforcement through the courts to put things right if required and we are confident that will be an effective approach.

We assess where across our business and our supply chain our most significant human rights risks exist, and ensure we have the appropriate policies in place to manage them effectively, developing new policies where required, together with robust processes to implement them. This Policy defines the basic principles and standards of Whitbread's most salient human rights risks and that we commit to respect at all times in our own operations and which we will expect our business partners, including suppliers, labour providers, sub-contractors and service providers, to respect at all times. This Policy is supported and linked with a number of other policy documents relating to specific human rights risks. These

are outlined below in the 'How does it Work' section of the Policy. We expect full compliance with applicable local and national legislation.

This Policy does not form part of any team member's contract of employment and may be amended at any time.

Whitbread's Key Human Rights Principles

Through an internal mapping exercise, the following human rights have been identified as our most salient risk areas and therefore our policy outlines the commitments and principles we work towards:

- **Labour rights** – we are committed to ensuring that workers' rights are respected in our operations and supply chains. These include:
 - **The right to full and productive employment and decent work, free choice of employment and freedom from slavery.** This is done by ensuring that all work performed by our team members is on the basis of a recognised employment relationship established through national law and practice. Forced, unethical employment practices, or human trafficking is not tolerated, and we adhere to the principles of the Modern Slavery Act.
 - **The right to equal pay for equal work, right to fair remuneration.** This is undertaken by ensuring that wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards.
 - **The right to form and join trade unions or worker associations.** All employees are free to join a trade union or to organise worker associations although Whitbread does not recognise any union for collective bargaining or any other purposes.
 - **Rights for all people including women's rights, children's rights and the rights of migrant workers.** This is by maintaining appropriate documentation and systems to prevent taking children into our employment, rigorous right to work processes and our zero-tolerance approach to discrimination of any kind.

[Further details can be found in our Code of Conduct.](#)

- **Community and stakeholder rights** – Operating within local communities, we recognise the importance of engaging with the human rights that are most important to those communities.
- **Environment and energy** – recognising our responsibility to reduce our environmental impact as much as possible to enable people to live and work well we have a robust programme in place. Our Force for Good targets and programmes focus on reducing carbon emissions, single use plastic and food waste, and sourcing our products to internationally recognised sustainable standards. [Further details can be found on our Corporate website](#)
- **Diversity and inclusion** – We commit to championing inclusivity and improving diversity across our business and have set a series of targets to this end we are committed to equal opportunities and have zero tolerance to discrimination and harassment. [Further details can be found in our Diversity and Inclusion policy.](#)
- **Gender** – We seek to ensure that women participate on an equal basis in our own business and in our supply chains. We believe enhancing equal rights

and economic inclusion for women should be long term priorities for our businesses. We also recognise the importance of gender identities (whether people identify as male, female, trans male or trans female, nonbinary, or use another term) as we want our teams to feel a sense of belonging and every guest to feel welcome. We know that diverse thinking drives innovation, and therefore accept all gender identities as part of our business and growth ambitions.

- **Ethical Corporate Practices** - our Responsible Sourcing Policy outlines our commitment to ethical corporate practices including compliance of our supply chain with national and international legal requirements including the UK Bribery and Modern Slavery Acts and informing Whitbread of any serious breaches or potential breaches.
- **Accessibility for persons with disabilities** - we aim to create an environment that is inclusive of all people and their unique abilities, strengths and differences. We embrace and aim to improve diversity at Whitbread, and we believe in equal opportunities for all. [Further details can be found in our Code of Conduct and Diversity and Inclusion policy.](#)
- **Restricted substances policy** - we operate a safe workplace for our teams and customers and give our team members the training and information they need to keep themselves, their colleagues and our customers safe. [Further details can be found in our Code of Conduct.](#)
- **Local employment** - we support local economic development wherever possible through employment of local communities and sourcing from local suppliers. [Further details can be found in our Code of Conduct.](#)
- **Data Protection** - Whitbread plc is committed to full compliance with the requirements of the Data Protection Act 2018 and The General Data Protection Regulation 2016/679. The 1998 Act and GDPR applies to anyone processing personal data, it sets out principles which should be followed; it also gives rights to those whose data is being processed. [Further details can be found in our Code of Conduct.](#)
- **Wellbeing** - The wellbeing of our team members is extremely important to us and we provide a number of services and support mechanisms to help individuals be at their best. We also provide accurate and accessible nutrition information products and services to assist team members and customers at our hotels and in our restaurants make healthy lifestyle choices.
- **People promise** - helps guide day-to-day work and make strategic decisions about the future of the business - but more importantly should be a reflection of how it feels to work at Whitbread. The key pillars are:
 - Everyone cares and feels cared for
 - Everyone is set up for success
 - Everyone can be their best
 - We all feel proud

[Find out more about our People Promise in your team member handbook.](#)

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► WHY IS THIS IMPORTANT?

In line with the UN Guiding Principles on Business and Human Rights, Whitbread recognises its responsibility to respect the human rights of people within its own operations, within its supply chain, in every market in which it operates. We acknowledge that every worker deserves the right to live and work in dignity.

This policy defines the most salient human rights for our business and value chain and the standards, policies and processes we will put in place to ensure they are respected. It also outlines the standards that must be followed and describes who is accountable and responsible for making it work, both within our organisation and influencing our business partners

This policy is reflective of local and national legislation and in particular:

- **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.
- **The UN Guiding Principles on Business and Human Rights**, which are a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations.
- **The International Labour Organisation (ILO) Declaration on the Fundamental Principles of Rights at Work** including freedom of association and the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the abolition of child labour and the elimination of discrimination.
- **The Sustainable Development Goals (SDGs)**, which are a set of 17 global goals set by the United Nations General Assembly in 2015 for the year 2030 of which human rights in our operations and supply chains relate most closely to Goal 1, No Poverty, Goal 5, Gender Equality, Goal 8, Decent Work and Economic Growth including goal 8.7 to tackle forced labour, human trafficking and child labour and Goal 10 Reduced Inequalities.
- **The Base Code of the Ethical Trading Initiative (ETI)** which sets out the labour standards expected across the global supply chain.
- **OECD Guidelines for Multinational Enterprises.**
<https://www.oecdwatch.org/oecd-ncps/the-oecd-guidelines-for-mnes/>

Failure to follow this policy may result in disciplinary action (and in some cases is a criminal offence) so it is very important you understand your responsibilities and what is expected of you.

► WHEN DOES IT APPLY?

This policy applies at all times.

► WHAT MAKES IT WORK?

We recognise that traditional risk management processes such as ethical audits, employment policies and safety and security procedures may miss key potential human rights impacts and focus overly on legal compliance. The implementation of our policy is framed instead around the six steps of the UNGP framework required to implement a human rights due diligence approach:

1. Commitment
2. Risk assessment

3. Prioritising action
4. Mitigating risk
5. Remediating issues
6. Monitoring and communicating progress.

Further details of our approach can be found in our most recent Modern Slavery Statement, our Annual Report and Accounts as well as in other reporting such as Gender Pay Gap and Ethnicity pay analysis.

We use reporting systems outlined in other policies to ensure that potential human rights issues are identified, and action taken swiftly where necessary. This includes issues raised through our [Grievance](#) and [Whistleblowing](#) processes.

We believe the provision of effective remedy is important wherever human rights violations occur. We seek to promote access to both formal and informal resolution where we are linked to or involved in violations. Judicial forms of remedy should be used where available and effective. In their absence, human rights violations should ideally be remedied at a local level.

The table below outlines roles and responsibilities team members at Whitbread have for making this policy work:

CEO AND MEMBERS OF THE EXECUTIVE COMMITTEE

Accountable for the implementation of the policy, embedding of it into ways of working and strategic decisions.

GROUP HUMAN RESOURCES DIRECTOR

Responsible for human rights in our own operations, supported at an operational level by business unit Managing Directors and Operations Directors.

GROUP GENERAL COUNSEL

Responsible for the overarching policy in relation to our supply chain.

HEAD OF SUSTAINABILITY

Responsible for the implementation of the policy in relation to our supply chain in conjunction with the Procurement Function.

MANAGING DIRECTOR AND OPERATIONS DIRECTORS

Responsible for Human rights, at an operational level, in our operations and day to day management of the safety and security of our guests

TEAM MEMBERS

If team members believe that they aren't being treated fairly or with respect, they are encouraged in the first instance to talk to their line manager or another person responsible for their area for help in resolving the situation. Whitbread's Grievance policy provides support and guidance to team members and managers regarding any concern raised by team members in relation to their work and steps that can be taken to resolve the situation.

For situations where team members want to raise issues about someone who is behaving in a way not in line with Whitbread's business practice or standards of behaviour or in harmful to team members, customers or the company's reputation, we operate a Speaking Out Helpline. The Speaking Out helpline is an independent and confidential helpline run by Hospitality Action which is open 24 hours a day, 365 days a year and available to all team members within the UK, Jersey, Guernsey, Isle of

Man and Ireland. Team members do not have to leave their names but are encouraged to do so if it will help resolve the issues raised. In our international businesses (Germany, China and the UAE), this service is provided by the third party Navex Global.

[Find out more about the Grievance and Whistleblowing processes](#)

Protecting human rights defenders

Human rights defenders can be any person or group of persons working to promote human rights, ranging from intergovernmental organisations based in the world's largest cities to individuals working within their local communities. Defenders can be of any gender, of varying ages, from any part of the world and from all sorts of professional or other backgrounds. Human rights defenders are not only found within NGOs and intergovernmental organizations but might also, in some instances, be government officials, civil servants or members of the private sector. In the course of their actions, human rights defenders may be threatened physically, psychologically, economically or socially.

Whitbread has a policy of non-interference with the lawful activities of human rights defenders and commits not to restrict their freedom of expression, freedom of association or right to peaceful assembly. This includes human rights defenders who actively campaign on issues that may be linked to our business operations. We are willing to engage constructively on issues related to our operations and our supply chain. We expect our partners to follow the same policy of non-interference. If any human rights defender believes that the Whitbread or its business partners have directly impacted on their human rights, they can use the Speaking Out hotline to lodge a formal complaint and our supply chain has access to an independent whistleblowing line.

► HOW DOES IT WORK?

The table below lists other Whitbread policies and their impact or relevance to human rights.

Policy	Impact or relevance
Responsible Sourcing Policy	Defines our minimum social, ethical and environmental standards and basic principles of cooperation expected from suppliers and business partners.
Modern Slavery Statement	Reports annually on our approach to combatting modern slavery in our supply chains.
Speaking Out Policy	Outlines process for team members to raise serious concerns about wrongdoings, danger or breach of Code of Conduct or national laws in our operations.
Grievance Policy	Supports and provides guidance to team members and managers regarding any concern raised by a team member in relation to their work.
Diversity and Inclusion Policy	Outlines our active commitment to provide equal opportunities and embrace diversity in our operations and explains the steps individuals can take if they do not feel they are being treated fairly or equally.
Code of Conduct	Outlines ways of working at Whitbread and sets out company's values through the Global People Principles, including working

	responsibly and ethically to be a positive part of the communities we operate in.
Health and Safety Policy	Defines our approach to maintain compliance with relevant legislation and managing enforcement activity concerning health & safety, food, fire and security.
Young Workers Policy	Applies in the UK and sets out that we only employ individuals over the minimum school leaving age and the special considerations (in UK law) for those under 18 in relation to working hours.
Working Time Policies	Working Time policy which is written for the UK (all markets in EU will be covered by the Working Time Directive from which this is drawn.
Private Employee Parties and Alcohol and Drugs Policy	Confirms position of or being under the influence at work is considered gross misconduct (this is also set out in the Employment Handbooks) but also deals with dependency/addiction.
Environment and energy Policy	Outlines at high level how we are reducing our environmental impact. Further detail on our environmental targets and progress can be found on our Force for Good pages.
Information Security Policies	Team members are required to protect Whitbread's information, and that of their customers, suppliers and providers. The policies provide controls and requirements to help team members ensure that they can meet this requirement.
Group Data Protection Policy	Ensures the adequate level of data protection as prescribed by the General Data Protection Regulation ("GDPR") and the national laws for cross-border data transfer.
Lone Worker Policy	Provides the process, framework and protective measures for when our team members may need to work alone.
Social Media Policy	Sets out the expectations we have of our team members in how they conduct themselves online in relation to customers, teams, suppliers and the business.

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