WHITBREAD

The way we work at Whitbread



Business Practices and Standards of Behaviour
UK & Ireland version 2026

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Doing the right thing to protect one of the UK's most successful companies with a unique heritage.

At Whitbread, building and maintaining trust is integral to every interaction, whether it's within our teams, with our suppliers, investors or our guests. It is our most valuable asset, and one of the reasons we're still thriving 280 years on. We've worked hard to earn it, and we must protect it.

We are trusted by the people we work with and our stakeholders because we operate with integrity, show respect and have a strong belief in doing the right thing. It is one of the reasons our brand is so well loved, and we retain loyal customers and guests. As ambassadors of Whitbread each of us has a responsibility to uphold that and strive to reinforce those qualities every day.

The way our business behaves, and the way we act towards each other matters to me – because it speaks to the heart of our organisation and the value we place on our relationships. At Whitbread we have a culture of zero tolerance where we respect and look out for each other – and we expect everyone to work and behave to the highest standard.

Doing the right thing is sometimes obvious and sometimes it's not. This statement of our business practices and standards of behaviour is designed to help give you guidance to deal with situations when it's not always obvious what is the right thing to do. It explains what to do if you spot something you feel is unethical, dishonest or unacceptable, and could be putting other people or our business at risk.

We cannot anticipate every situation you may come across but by understanding our values, business practices and standards of behaviour you can apply them to any situation. I urge you to speak out if you see or hear anything that doesn't follow or meet our high standards. If you are in any doubt, please ask your line manager or you can also call the Speaking Out helpline.

By each of us following these practices and standards, we can continue to grow our business in the right way and be proud of our organisation, our culture and our ethics.

Dominic

Our Ambition

To be the number 1 budget hotel business in Europe

Our Purpose

To help our guests feel brilliant through a great night's sleep

Providing high-quality, affordable hotel rooms to our guests, to help them live and work well and to positively impact the world around us.

With no barriers to entry or limits to ambition, we will provide meaningful work, skills and career development opportunities for our teams.

Our Values

To achieve our ambition, how we show up matters

Our behaviour is what people see. We have created Values that codify our culture and really capture what is special about working at Whitbread. Each one of us has a personal responsibility to live our Values.

warm+ welcoming

to our guests and each other

passionate +proud

about the big picture and the little things that matter

budget +brilliant

in everything that we do

How we show up

We value difference

+

We are team players

We bring our best every day

+

We are guest obsessed

We deliver great value

+

We are always a step ahead

About our business practices and standards of behaviour

It's not always obvious what's right or what's legal in any given situation. This guidance provides an overview of some of the standards each team member is expected to respect every day.

If you want to be sure that what you're doing or planning to do is appropriate, then use this document and our supporting policies to guide you.

You can find our supporting policies on the 'People Policies' page on the intranet. They give you more detail in various areas, ranging from human rights and diversity, to data privacy and information security.

It is each and every team member's responsibility to follow these business practices and standards of behaviour so it is very important to understand what is expected of you.

If in doubt, talk to your line manager, or another person responsible for your area, for support and guidance.

If you are a line manager, it is your responsibility to make sure your team understands our business practices and standards of behaviour set out in this guidance and supporting policies and how to apply them in practice.

If you're not sure about something, ask yourself these key questions before you act.

Is the approach consistent with Our Values, Standards and any applicable law or regulation?

You can deliver great customer experiences and conduct business with integrity knowing that Whitbread supports you in doing the right thing.

Could your approach compromise you or Whitbread?

You play a critical role in protecting our values, our brands and our reputation and in ensuring that Whitbread has a great work environment.

How would your approach look if published in the newspaper or online?

If you are unsure of what to do in a situation, you have guidance available to you including our Business Practices and Standards of Behaviour.

Would you be comfortable with the example it sets for future decisions?

When you believe something isn't right, it probably isn't. Please speak up and share your genuine concerns, knowing that Whitbread wants to hear them.

Speaking Out

OUR PRINCIPLE

AT WHITBREAD, WE BELIEVE IN BEING TRANSPARENT AND OPEN.

WHAT DO WE MEAN?

Wherever you work for Whitbread, you can report major business wrongdoing, anonymously and confidentially, using the Speaking Out service provided by SafeCall.

This might relate to an individual, a site, a department, or the whole organisation, including our suppliers. If your concern relates to unethical, illegal or unsafe business practices like:

- Bribery / Corruption
- Theft / Fraud
- Mismanagement of funds
- Misuse of corporate assets
- Serious health & safety violations
- Serious environmental concerns
- Misleading marketing / advertising
- Data privacy breaches

Contact Safecall

Here to help 24 hours a day, 365 days a year.

safecall.co.uk/whitbread

Freephone

UK..... **08088010351**

IRL..... **1800910351**

You can make your reports anonymously, and in confidence, and rest assured your report will be investigated and feedback provided in line with the Speaking Out policy.

Grievance

OUR PRINCIPLE

OPEN COMMUNICATION WITH YOUR LINE MANAGER IS CRITICAL TO ENSURE A SUCCESSFUL WORKING RELATIONSHIP.

WHAT DO WE MEAN?

The best way to deal with most issues or concerns is to talk to your line manager or if the issue relates to your line manager, speak to the next more senior manager. Any genuine issues or concerns raised in good faith will be taken seriously and will always be investigated.

If you have taken these steps but still require employee relations advice – you can contact the Employee Relations helpdesk on **01582 844344**

For things like:

- Harassment / bullying
- Discrimination
- Physical violence
- Unfair treatment
- Management behaviour;
- Or in any other way not aligned with our Code of Conduct

Please raise a grievance report and your concerns will be taken seriously and dealt with in a fair and balanced way. Please read the Grievance policy or other associated policies which can be found on the intranet to assist you in gaining a resolution.

If you are not comfortable raising a grievance with your line manager or another person within the business, you can always use the Speaking Out service provided by SafeCall as above.

WHITBREAD

Our People

Protecting Human Rights
Respect in the workplace
Equal Opportunities
Staying safe at work
Developing our people

Human Rights

OUR PRINCIPLE

EVERYONE DESERVES THE RIGHT TO LIVE AND WORK WITH DIGNITY. IN LINE WITH THE UNGPS (UN GUIDING PRINCIPLES FOR BUSINESS AND HUMAN RIGHTS), WE ARE COMMITTED TO RESPECTING HUMAN RIGHTS ACROSS OUR BUSINESS.

WHAT DO WE MEAN?

Human rights are rights inherent to all human beings, 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.

We recognise our responsibility to respect the human rights of people within our own operations, and we expect our business partners to respect these rights too. These expectations are made clear to them at the start of any business relationship, and are monitored and measured on an ongoing basis.

We encourage you to read Whitbread's Human Rights policy. If you see any abuses of the policy, then please report it to your line manager, or call the Speaking Out helpline straight away.

Lately my place of work has been very busy and it has been hard to find time to do routine cleaning. At this morning's meeting, our manager told everyone that if they don't complete their tasks before they finish their shift, they will have to stay on, on an unpaid basis to do so. Is it okay for our manager to ask this of us?

No. This type of behaviour is not acceptable or endorsed by Whitbread. Whitbread is committed and legally obligated to ensuring that all team members are paid for the hours they work. Any requests to work "extra hours" must be reported to the senior line manager or another person that has overall responsibility for your area



Respect in the Workplace

OUR PRINCIPLE

WE TREAT EVERYONE FAIRLY, WITH RESPECT AND KINDNESS. WE HAVE ZERO TOLERANCE TO DISCRIMINATION.



WHAT DO WE MEAN?

At Whitbread, we all have the right to be treated respectfully and with kindness, and have an obligation to create an environment for others where everyone feels this way. This extends to our guests and customers as well as outside contractors and members of the public. This includes how you treat others, and how you react to how others are treated.

Respecting your colleagues, guests and customers means you never:

- Make assumptions about people, based on your own biases, experiences and/or personal views.
- Make comments including jokes that could be offensive or derogatory or cause offence and/or upset. This includes (but is not limited to) any racist, transphobic, homophobic or bi-phobic comments or jokes. For clarity, these could be explicit comments or 'innuendo/ banter'.
- Bully, harass or victimise anyone, including based on their personal characteristics.
- Use physical or verbal abuse or threats.
- Share any or display offensive, derogatory or sexually explicit materials by any communication tool including social media. Make sure you read Whitbread's Social Media policy, as failure to follow it may result in disciplinary action, so it is very important you understand what is expected of you.
- Use any unwelcome behaviour towards a team member or person doing business with Whitbread.

Check out Whitbread's Diversity and Inclusion policy for more detailed guidance.

If you believe that you or your colleagues aren't being treated with respect and kindness, talk to your line manager or another person responsible for your area in the first instance. Whitbread's Grievance policy also sets out positive steps to take to resolve the situation.

Q&A

I heard someone in my team say to another colleague that if you are gay, you shouldn't become a parent. I disagree. What should I do?

Every individual has a responsibility to speak out when they witness something that is inappropriate, regardless of whether it was aimed at you. Consider speaking to the person explaining how it made you feel and why you think it is inappropriate. If you prefer or feel that the issue hasn't been resolved escalate it to your line manager.

A colleague made a joke about how they are attracted to me, and attempted to touch me inappropriately. What should I do?

We take any instances of sexual harassment really seriously at Whitbread. You should raise this with your line manager immediately, so that they can offer you the appropriate wellbeing support and discuss what next steps will be taken to investigate the incident.

ALL TEAM MEMBERS, CUSTOMERS, SUPPLIERS OR ANYONE WE WORK WITH MUST BE TREATED WITH RESPECT.

Q&A

I have a long term health condition and was ill last week. One of my team messaged the Team chat, sharing a screen-shot of me from Facebook while I was absent, saying I didn't 'look' unwell.

You should raise this incident with your line manager to investigate further. We strive to educate everyone on unconscious biases such as making judgements about hidden disabilities and illnesses.

I am a trans female, and I have informed my team members I would like to go by the pronouns she/her. However, a team member is intentionally using he/him because they said I will always be a man.

At Whitbread we have zero tolerance to Transphobia. Raise this incident with your line manager to investigate. You can find additional support in our gender identity policy, and via GLOW, our LGBTQ+ network.

My manager told me I should straighten my hair as it would look 'neater'. I am Afro-Caribbean, and this really offended me.

We have zero tolerance for any type of racism, and are proud to support the Halo Code, a campaign which aims to get rid of hair discrimination. As this incident is about your line manager, speak to their line manager in the first instance. You can also find additional support via our Race, Religion and Cultural Heritage network.

You have just witnessed a guest saying transphobic comments about another guest who was checking in. What should you do?

Please report this incident to your line manager in the first instance. They will speak to the guest and outline our policy and if appropriate use the Barring Guest Policy, where we reserve the right to cancel a reservation with immediate effect and (if appropriate) eject a guest from our Premier Inn premises, refuse future reservations and/or refuse entry or accommodation at any of our hotels. If you have been affected by this incident, please contact Hospitality Action for some additional independent support.

Whilst dealing with an angry guest, they said things to you that you consider racist. What should you do?

Please report this incident to your line manager in the first instance. They will speak with the guest and explain that we are committed to protecting the safety and wellbeing of our team and the comments have affected a team member. If the situation cannot be resolved amicably, and there is evidence that the guest has been racist, your line manager can use the Barring Guest Policy to cancel the reservation and if appropriate eject the guest from the premises. If you have been affected by this incident, please contact Hospitality Action for some additional independent support.

Equal Opportunities

OUR PRINCIPLE

WE BELIEVE IN EQUAL OPPORTUNITIES FOR ALL, WITH NO BARRIERS TO ENTRY OR LIMITS TO AMBITION.

Please see Whitbread's Diversity and Inclusion Policy for more information and guidance.

WHAT DO WE MEAN?

At Whitbread, we all have equal access to opportunities for growth and development, regardless of our personal characteristics, background and/or how we identify.

It is important that we don't make assumptions about people, based on our own biases, experiences and/or personal views.

- Opportunities for progression are open to everybody interested, to ensure all team members have an equal chance to compete and develop, and we will always appoint jobs to the best person for the job.
- We do not make decisions based on behalf of the individual, even if the intent is positive. These decisions included, but are not limited to, pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.



Q&A

I have a vacancy in my team. I've informed all my team except for one team member who is currently on maternity leave. I assume they wouldn't be interested in progression right now. Is this OK?

No, this is not OK. All team members have equal rights to access any opportunities to progress, including those employees on maternity leave. The assumption that they wouldn't want to progress would be deemed as discriminatory. Also, if the team member is unlikely to be aware of the opportunity, you should contact them to make them aware.

I have a role available in my team, and one of my team has asked if they could do it part time. It would be much more difficult for me to make the role work on a part time basis or as a job share. Is it OK to tell them no?

At Whitbread we want to promote flexible working options to our teams. As a line manager, it is your responsibility to explore with the individual how we can try and make that work and mitigate any impact to the business. For more information, please read the flexible working policy.

Q&A

I am hiring. I think the best candidates have university degrees. Is it OK to use this as a filter for candidates?

We believe in no barriers to entry and no limits to ambition at Whitbread. Simply put, greater diversity makes us a better business. In narrowing your talent pool to university graduates, you are narrowing the amount of diverse thinking you will have in your team and creating barriers for some communities to apply. Whilst some roles might require specific qualifications, we would still encourage our teams to be open-minded about different experiences, regardless of where or how they have been gained.

I am about to do Half Year reviews for my team. There is someone in my team who works in a really similar way to me, perhaps because they have a similar background. They just get the job a bit better, so their performance rating will be higher than the rest of my team. Is this OK?

It is important that you are fair and factual in your half-year performance ratings. You may be experiencing similarity bias in your current assessment. Instead, think about the factual evidence for each individuals' performance over the six months, in terms of what they have achieved and how they have worked. Discuss your proposed ratings with a trusted peer to make sure you are mitigating your own biases and being fair.

I have a disability which impacts how long I am able to work for. What would really help would be working 3 hour shifts instead of 6 hours, as a housekeeper this will be more manageable. What should I do?

Have a discussion with your line manager and explain to them what adjustment you need and why. In most cases, it should be possible to trial different combinations of hours for a period to see if it works for you and for the site.

I am dyslexic and would benefit from some additional support in the workplace. I'm not sure exactly what I need, but I struggle to read cascades and some of the communications. Can Whitbread support with this?

Absolutely. It is important that we ensure you get the adjustment that is right for you. To start with, have a conversation with your line manager and check out our Workplace Adjustments policy to guide you both.

Staying Safe at Work

OUR PRINCIPLE

WE WILL OPERATE A SAFE WORKPLACE FOR OUR TEAMS AND CUSTOMERS. WE GIVE OUR TEAM MEMBERS THE TRAINING AND INFORMATION THEY NEED TO KEEP THEMSELVES, THEIR COLLEAGUES AND OUR CUSTOMERS SAFE.

WHAT DO WE MEAN?

We must keep everyone safe. We'll give you the safety training and information you need to keep you and your environment safe, but if you're not sure about anything, check with your line manager. As well as our policies and procedures, there are a number of important laws and regulations that affect how we work. If you need more information, ask your line manager or take a look at Whitbread's Health and Safety policy.

If you travel overseas for work, please ensure you read Whitbread's International Travel Security policy and if you have any concerns, please speak to your line manager in advance of your business trip.

An important part of keeping a safe working environment is working without the influence of alcohol, illegal drugs or other substances that might alter your judgement and abilities. If you're aware of any behaviour like this that might cause a safety or environmental hazard, then you must tell your line manager or call the Speaking Out helpline straight away.



Q&A

I saw a member of the Kitchen Team using out of date food, but didn't feel confident to challenge them or tell my line manager. What should I do?

We hope that you feel comfortable talking about any worries or problems with your line manager or another responsible person at work. However, we realise that speaking out can be difficult.

Our Speaking Out helpline has been put in place so that we all know what to do if we witness something we believe is wrong, and so that you know you're safe and supported if you decide to speak out.

My line manager is asking me to travel overseas on business. What should I do to stay safe?

We take the safety and security of our team members very seriously. To help make sure you stay safe during your business travel, you should refer to Whitbread's International Travel Security policy.

The policy will tell you more about how you can assess whether the country you intend to visit is regarded as safe and the precautions you should take.

For example, if the policy classifies a country as high risk, you would need to follow the instructions for signing up to the company's watch service that will monitor you whilst you're away.

You should also ensure that you have completed the International Travel Security training on Whitbread's Academy Online before you travel. If you still don't feel comfortable travelling, speak to your line manager straight away

OUR PRINCIPLE

WE ARE COMMITTED TO HELPING TEAM MEMBERS ACHIEVE THEIR BEST AD STRIVE TO BUILD WINNING TEAMS.

WHAT DO WE MEAN?

All of our decisions about recruitment, hiring, development and promotion should be made on ability, skills, experience, behaviour, performance and potential to do the job. By employing the best people and creating an environment in which they can flourish and develop, we will achieve our business goals including our strong desire to build winning teams.

Your line manager is always there to listen to any suggestions or issues you might have. They'll also hold regular development reviews to talk to you about how you're getting on and how we can help with your personal development.

OUR PRINCIPLE

IT'S IMPORTANT THAT OUR TEAM MEMBERS FEEL ENGAGED WITH WHAT THEY'RE DOING AND MOTIVATED TO DO A GREAT JOB.

WHAT DO WE MEAN?

We regularly ask for your opinions and feedback. We use what you tell us to create an action plan and make improvements across the company.



WHITBREAD

Our Business

Compliance with laws
Marketing and advertising
Conflicts of interest
Open and fair political

Complying with Laws

OUR PRINCIPLE

WE ALWAYS ACT WITHIN THE LAWS OF THE COUNTRIES WE WORK IN.

WHAT DO WE MEAN?

We make sure that our policies and procedures comply with the law of any country in which we work, and we expect you to comply with those policies and procedures and with the law at all times. We don't condone law breaking and we will help the authorities deal with any offenders.

I am a line manager and I have to carry out an annual check of the Right to Work documentation for my existing team members that don't have indefinites leave to remain in the UK.
Is this really necessary?

Yes, you must carry out, record and retain relevant paperwork for these checks - it's the law. If you don't then you could be held personally liable and could result in you or the company being prosecuted with significant fines and worse still, imprisonment for you. Failure to do these things may result in disciplinary action being taken against you, which could result in your dismissal.



Open and Fair Competition

OUR PRINCIPLE

WE BELIEVE IN OPEN AND FAIR COMPETITION AND ONLY SEEK COMPETITIVE ADVANTAGE THROUGH FAIR AND LAWFUL MEANS.

WHAT DO WE MEAN?

Competition law is designed to ensure that businesses are competing fairly and are protected from others acting unfairly. It is unlawful for competing businesses to make arrangements amongst themselves that could undermine open and fair competition.
For example:

- Setting prices at which competitors will each sell their products or services to customers;
- By agreeing not to compete for each other's customers or agreeing which business will trade in which particular territory; and
- Exchanging commercially sensitive information with competitors such as business plans, future pricing strategy, marketing plans, or supply chain costs.

Arrangements do not have to be in writing to break the law; they can be agreed in a meeting, at a corporate event or during a telephone call. Illegal arrangements can also arise within a specific arrangement where competitors mutually align their behaviours in light of what others are doing. All team members must take great care when dealing with our competitors, whether as part of your role or socially.

Non-compliance with competition law can have extremely serious consequences for our businesses, including significant financial penalties and legal claims from competitors and customers, as well as the resulting damage to our reputation. Individuals involved in deliberate breaches will face disciplinary action up to and including dismissal, and in some cases possible criminal proceedings leading to imprisonment and fines.

One of our local competitors suggested we agree to set a minimum price for our hotel rooms or an event taking place in a town where we both have hotels. Is that OK?

No. Agreeing to this sort of activity is anti-competitive which could lead to you and Whitbread facing fines or even criminal charges. You should report the conversation to your line manager straight away and get them to involve the Whitbread legal team, who will advise on next steps.

A salesperson who works for a competitor and I are friends. Occasionally we talk about our marketing plans. She once mentioned that they occasionally talk about marketing plans. Should a Whitbread colleague be concerned?

Yes. Your colleague is revealing confidential information that Whitbread has invested time and money to develop. By discussing such matters, she could be breaching competition laws. If you have any concerns, please refer to Whitbread's Competition policy and if in doubt, please speak to your line manager or to the Whitbread legal team.

Marketing and Advertising

OUR PRINCIPLE

OUR COMMUNICATIONS WITH OUR CUSTOMERS OR POTENTIAL CUSTOMERS MUST BE HONEST, TRUE AND ACCURATE. WHEN WE SAY SOMETHING ABOUT OUR PRODUCTS OR SERVICES WE BE ABLE TO SUBSTANTIATE IT.

WHAT DO WE MEAN?

It's against the law to mislead customers with our sales or marketing material. Any statement that sells or markets our products and services must be honest, true and accurate and we must be able to substantiate it. Claims we make for our products and services must comply with applicable advertising and marketing laws and regulations.

If you require any further information on compliance with advertising or marketing laws and regulations, please speak to your line manager or to the Whitbread legal team.



Conflicts of Interest

OUR PRINCIPLE

WE SHOULD AVOID OR MANAGE SITUATIONS WHERE OUR PERSONAL INTERESTS COULD CONFLICT WITH THE INTERESTS OF WHITBREAD.

WHAT DO WE MEAN?

We want all of our business decisions to be made fairly and objectively. You should always act in Whitbread's interests, rather than your own, when you're making business decisions.

Conflicts between your interests and Whitbread's can hurt our business and reputation even when you don't intend to do anything wrong. Ask yourself how your actions and relationships might appear to others. You need to tell your line manager if you think you might have a conflict of interest.

Conflicts of interest could include:

- Activity outside work that might affect your work at Whitbread;
- Use of Whitbread's suppliers or contractors for personal use;
- Any financial interests you have in other companies Whitbread deals with; or
- A situation where you're dealing with someone as part of your work who is also a close friend or a member of your family.

If any of these situations arise, then tell your line manager straight away. Someone else should be given the responsibility for dealing with the matter and making any decision.

My sister is looking for a job and I have a vacancy in my team. She is trained to do this type of work. Is it OK if I hire her?

Whitbread does not wish to place any team members in a difficult situation at work, through any potential conflict of interest that may occur. In this example, your relationship could be seen by others to impact on performance, judgement or decision making.

You should avoid entering into any situation where your personal interests may conflict with those of Whitbread, such as employing a relative to work in your team.

In this situation, someone with overall responsibility for your area should deal with this matter on your behalf.

My partner runs a small printing company, and I'm sure they could make our leaflets for a lot less than the current supplier. Can I give them the contract?

No. Imagine how it would look if people realised you had given the contract to your partner. If your partner plans to bid for Whitbread work, you must declare your relationship to your line manager straight away. Someone with overall responsibility for this procurement area should be given the responsibility of dealing with this matter and making any decision.

Political Activities

OUR PRINCIPLE

WE DO NOT PARTICIPATE IN ANY POLITICAL ACTIVITIES BUT WE DO RESPECT THE RIGHT TO HOLD DIFFERENT POLITICAL VIEWS.

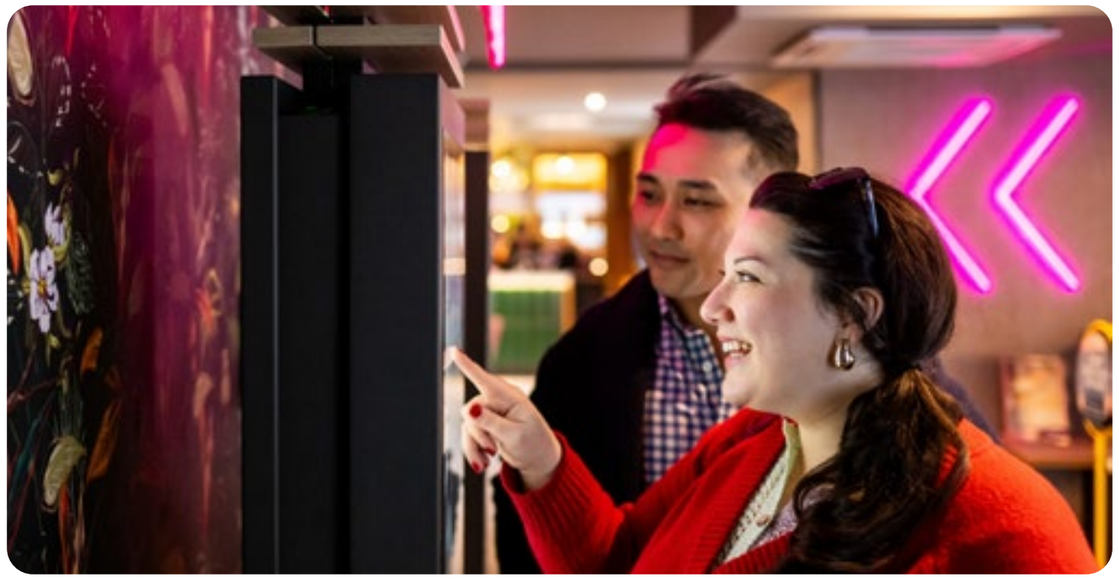
WHAT DO WE MEAN?

We don't engage in any political activity as a company. This means we don't sponsor any political parties and we don't make any donations to political parties. But we do respect everyone's right to hold different political views and you are free to participate in the political process – in fact, we believe it's important to play our part in improving our communities. However, any political activity should take place in your own time and your point of view must not influence how you behave towards our guests or anyone else.

It is not appropriate to use any of the company's funds for political activities. Never offer our facilities to political organisations free of charge, or at a discounted rate.

I am keen on participating in local politics. Is this OK?

Yes, you're allowed to participate in the political process as long as it's voluntary, in your own personal time and it does not create a conflict of interest with your role at work.



Gifts and Hospitality

OUR PRINCIPLE

WE MUST ENSURE GIFTS AND HOSPITALITY ARE REASONABLE AND DON'T IMPROPERLY INFLUENCE OUR JUDGEMENT OR DECISION MAKING. IF WE'RE UNSURE ABOUT ACCEPTING ANY GIFT OR HOSPITALITY, WE SAY NO.

WHAT DO WE MEAN?

We all deal with customers, suppliers or other parties we do business with regularly. This means that sometimes you might be offered a gift, hospitality or other benefit that could place you or Whitbread in an awkward position, that is, in a position where what you are being offered might be seen as intended to persuade you to do something you shouldn't. This might be awarding a contract or doing something for the person who makes the offer which you wouldn't otherwise do.

Hospitality includes invitations to social functions, sporting events, meals and entertainment. Any gifts or hospitality should always be customary and reasonable in terms of value, frequency or timing, and must be recorded on the gifts and hospitality log sheet (as contained in Whitbread's Gifts and Hospitality policy). Information on limits and guidance is also contained in Whitbread's Gifts and Hospitality policy. Before you offer or accept a gift or hospitality, ask yourself the following questions:

- Is the purpose of the offer or the timing of it, to persuade me to favour the person making the offer?
- Could it be against the law?
- Does this offer look odd or out of place under the circumstances?
- Does the offer seem high in value?
- Has this person tried to give me more than one gift recently?
- Would the company or I be embarrassed if the offer became public?

If the answer to any of the above is "Yes", then please don't make or accept the offer. Also, if you're not sure whether it's OK to accept a gift, then talk about it with your line manager. If you are in any doubt at all, it's best to say no.

Many people working directly with customers or guests are offered tips for their services. Receiving tips from customers for doing your job well is fine, but don't ask for tips as these must be completely voluntary. Also, be careful not to accept any tip from someone who is offering it in exchange for you or them to break the rules. This would be a bribe.

You can find more information in Whitbread's Gift and Hospitality Policy.

We have a supplier who has invited several team members to dinners and events. There doesn't seem to be any hidden motives or expectations behind it, other than to build a good working relationship. What should I do?

We don't want to offend but we don't want to give anyone the wrong impression either.

Before you accept any gift or hospitality, please check Whitbread's Gifts & Hospitality policy. If in doubt, politely decline.

Make sure you complete your Hospitality Log, irrespective of whether the hospitality was accepted. Refer to the Gifts and Hospitality Policy for examples of when it is also necessary to seek prior permission from your line manager.

Bribery and Corruption

OUR PRINCIPLE

WE MUST NEVER GIVE OR ACCEPT A BRIBE OR PARTICIPATE IN DISHONEST PRACTICES. IT CAN SERIOUSLY DAMAGE OUR REPUTATION. IT IS BETTER TO MISS OUT ON A BUSINESS OPPORTUNITY THAN COMPROMISE OUR INTEGRITY AND HIGH STANDARDS.

WHAT DO WE MEAN?

Whitbread is strongly opposed to all forms of bribery. A bribe involves the promise of money, a gift or a favour to influence someone's behaviour so they don't perform their role properly. Never give or accept a bribe. Please also make sure that third parties working on our behalf understand that we do not approve of giving or accepting bribes.

Payments or gifts made to public officials to speed up or facilitate actions that officials are duty bound to perform are not permitted. Even if such payments are for small amounts, such payments are illegal in most countries and Whitbread makes no distinction between such payments and bribes.

Likewise, we must not get involved in any dishonest practices including activities such as fraud, deception or collusion.

Any allegation of bribery or dishonest practice can have extremely serious consequences for Whitbread and its businesses as well as serious damage to our reputation.

Individuals involved in bribery or corrupt practices will face disciplinary action up to and including dismissal, as well as possible criminal proceedings leading to imprisonment and fines.

It is better to miss out on a business opportunity than compromise our integrity and high standards.

A guest is offering me a tip for my services. Is that OK?

Yes. However, it's not OK to accept cash or cash equivalent (e.g. vouchers) from someone who then might expect you to favour them or their company.

I'm being asked for a payment from a public official in order to speed up matters. What should I do?

This is illegal and you should refuse. Please also raise it with your line manager straight away and if you have any doubts or concerns about their response, please contact the Speaking Out helpline.

Fraud and Theft

OUR PRINCIPLE

WE LOOK AFTER WHITBREAD'S PROPERTY AS IF IT WERE OUR OWN, AND WORK TOGETHER TO SAFEGUARD IT TO PREVENT FRAUD OR THEFT.

WHAT DO WE MEAN?

We all work hard to make Whitbread successful, so it is important that we work together to safeguard the company's property and assets and prevent fraud or theft.

Whitbread has comprehensive policies and procedures in place to protect its finances and takes any breaches of those procedures very seriously. This extends beyond taking money from the till, to claiming expenses, the payment of bonuses and the use or giving of vouchers.

Fraud or theft could either be committed by people within Whitbread or by external organisations or individuals. In all cases it impacts Whitbread's performance and counteracts the hard work and commitment of everyone else. Whitbread will refer all matters of suspected fraud to the police.

If you believe that fraud or theft is taking place, it is important that you talk to your line manager or call the Speaking Out helpline straight away.



Tax Evasion

OUR PRINCIPLE

WHITBREAD IS FIRMLY COMMITTED TO MEETING ALL OF ITS STATUTORY TAX OBLIGATIONS, WHEREVER IN THE WORLD THEY MIGHT ARISE. EQUALLY, WHITBREAD AND ITS EMPLOYEES SHOULD NOT FACILITATE OTHERS TO EVADE TAX.

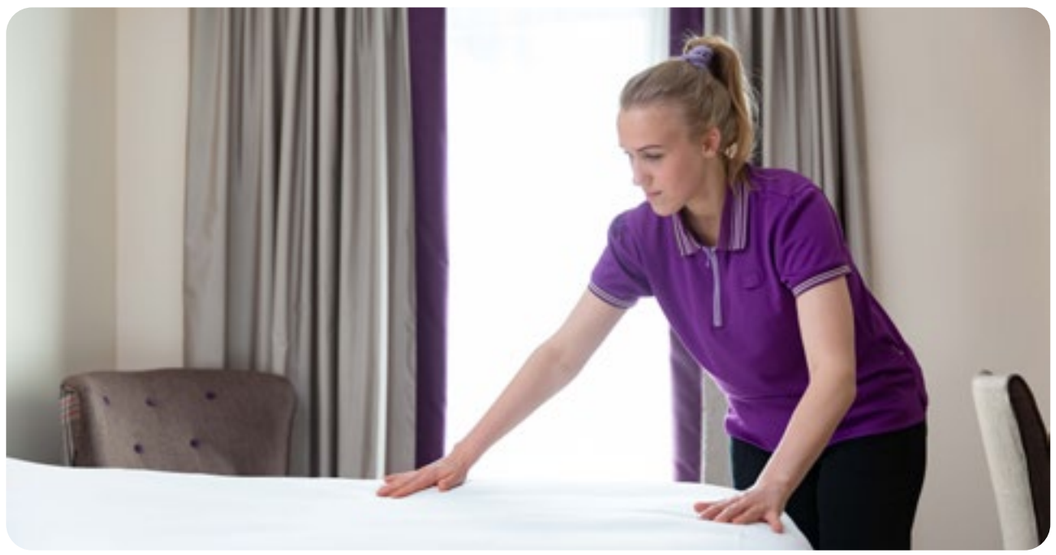
WHAT DO WE MEAN?

Tax evasion is a crime and Whitbread can be criminally liable for acts committed by an employee, agent or consultant which facilitate others to evade tax. Common risks include requests for payment in cash or redirected payments. If tax evasion takes place, a business could face an unlimited fine as well as criminal convictions.

If you have any concerns that any team member, supplier or other person connected with Whitbread may have entered into any transaction to evade tax or to assist any other person to evade tax, please speak to your line manager immediately and if in doubt, please contact the Whitbread Group Tax team.

I work in finance and have been asked by a supplier to pay a bank account in the British Virgin Islands. Payments normally go to a UK bank account. What should I do?

If a supplier has asked you to do something unusual, this may require further investigation as it may involve tax evasion.



Inside Information

OUR PRINCIPLE

INFORMATION ABOUT THE COMPANY WHICH MAY AFFECT WHITBREAD'S SHARE PRICE IF IT BECAME PUBLIC KNOWLEDGE MUST NOT BE USED FOR BUYING OR SELLING WHITBREAD SHARES FOR YOUR OWN OR ANYONE ELSE'S BENEFIT.

WHAT DO WE MEAN?

Whitbread is a company listed on the London Stock Exchange. There are rules and regulations that apply to listed companies preventing individuals buying or selling Whitbread shares on the basis of inside information.

Anyone working for or with Whitbread may become aware of inside information about Whitbread or its businesses. Inside information may include:

- Financial information;
- Development of new products or services;
- A proposed business opportunity like buying or selling a business or entering or ending a joint venture;
- Government or regulatory body investigation into the company;
- Changes in senior personnel.

It makes no difference whether you deal in the shares yourself or someone else does it for you, whether it's for your own or anyone else's benefit. This applies even after you've stopped working for Whitbread.

It is a criminal offence to buy or sell Whitbread shares on the basis of inside information.

It is not public knowledge yet, but I know from my work that our profits could be higher than expected so now would be a good time to buy Whitbread shares. Can I buy Whitbread shares? If I can't, can I tell my family and friends?

Absolutely not. It's called 'insider dealing' and it is a very serious criminal offence. If in doubt speak to a member of the Whitbread company secretariat team.



WHITBREAD

Our Company

Property, records and information.

Complete and accurate accounting records



Protecting Company Property

OUR PRINCIPLE

WE SHOULD LOOK AFTER COMPANY PROPERTY AS IF IT WERE OUR OWN; WE SHOULD USE IT CAREFULLY AND PROTECT IT FROM ANY MISUSE.

WHAT DO WE MEAN?

We all use company property in order to carry out our jobs. This includes buildings, vehicles, equipment supplies, computers, networks, e-mail and voicemail systems. Likewise, as part of our jobs we will create or develop things like brands, trademarks, designs, ideas, software, inventions as well as being privy to corporate opportunities, trade secrets and business information, all of which is company property too. This principle extends to third parties we may work with.

Please look after all company property as if it were your own. We understand that from time to time our employees may use company equipment to access the internet for personal reasons but we should always protect it from misuse.

Complete and Accurate Accounting Records

OUR PRINCIPLE

WE SHOULD ENSURE ALL FINANCIAL AND OTHER REPORTS AND RECORDS ARE HONEST AND ACCURATE.

IMPORTANT.
It's important that you keep all documents safely and for the right length of time

WHAT DO WE MEAN?

Honest and accurate records help our shareholders see how their investments are being looked after. They're also a legal requirement.

Creditors, government officials, partners and people from across Whitbread all need to access books, records and statements about our financial performance. These must give fair and accurate information and be protected from unauthorised viewing, damage and loss.

It's important that you keep all documents safely and for the right length of time.

All people who work regularly with our reports and records need to follow our guidelines and procedures. If you are unsure of anything, always check with your line manager.



Confidential Information

OUR PRINCIPLE

WE SHOULD KEEP ALL NON-PUBLIC INFORMATION SAFE AND MAKE SURE IT NEVER GETS INTO THE WRONG HANDS.

WHAT DO WE MEAN?

Please be aware of where you are when you are discussing or working on company matters.

Whitbread's business information is one of our most valuable possessions and we expect all team members to keep this information confidential and safe, only share it internally on a "need to know" basis and only disclose it to a third party on a confidential basis and with legal or company permission to do so.

Confidential information may include:

- Financial information, business plans, business strategies, business practices and relationships, processes, systems or methods of operation;
- Specifications, pricing policies, marketing plans, costs or promotional activities;
- Inventions, innovations, know-how or trade secrets;
- Information relating to customers, suppliers and partners.

If you're unsure whether company or business information is confidential, speak to your line manager before telling anyone else. Also let your line manager know if any such information has been shared or used without permission. If in doubt, you should speak to a member of the Whitbread legal team before any such information is shared or disclosed.

We have designated people who are solely responsible for talking to the media. This is to make sure that no confidential data or business information can accidentally be made public. So, please don't talk to the media, even if they approach you.

On some days I work from home, but when I feel the need to get out, I take my laptop with me and go for a coffee at a coffee shop. Is this a problem?

You must be very careful when working in public areas not to discuss company or business information where other people may overhear you or view your laptop screen.

If it is necessary to conduct a call in a public place, be mindful of your surroundings and inform the person you are speaking to of your whereabouts to manage their expectations.



Data Protection and Privacy

OUR PRINCIPLE

WE MUST RESPECT EVERYONE'S PRIVACY AND ENSURE THAT WE COLLECT, USE, STORE AND DISPOSE OF ALL PERSONAL DATA IN COMPLIANCE WITH ALL APPLICABLE DATA PROTECTION LAWS.



WHAT DO WE MEAN?

Data protection and privacy laws regulate how we collect, use and manage personal data (such as names, addresses, dates of birth, national insurance numbers, passport numbers and other data which can identify an individual). This data may relate to our employees, guests or customers, suppliers and partners.

We must comply with data protection laws whilst also complying with our own standards and policies on personal data.

We only collect personal data in accordance with data protection laws. We must protect personal data and keep it secure at all times and in addition, we must take particular care when dealing with sensitive personal data (such as sickness records and health questionnaires).

Please make sure all personal data is managed or handled in accordance with the permissions given by the individual to whom the data relates.

We should anonymise data where and when necessary. This means removing names, contact details or any other information that could identify an individual. You should also protect personal data by using privacy enhancing techniques such as encryption where this is possible.

Please refer to Whitbread's Information Security policies on the various security techniques that can be used.

If you're unsure whether data should be disclosed, speak to your line manager straight away. Likewise, you must inform your line manager if any personal data has been accessed, shared used or deleted without permission. Line managers must report any data breach to the Whitbread privacy office.

Please refer to Whitbread's Information Security policies and Group Data Protection policy and guidance documents as these will give you more information on who to contact and what to do when handling personal data, or in the event of a breach.

Q&A

I have lost my laptop. What should I do?

You may have stored employee or customer details (such as guest contact details) or other data incident email address, personal information on your laptop. This is personal data and it is important that it does not fall into the wrong hands so please ensure that you inform your line manager and in any event, you must report your lost laptop to Whitbread's Information Security team straight away

I want to email all guests to tell them about parking at one of our Whitbread sites. Is this ok?

Given guest email addresses are personal data, you must use the blind copy function (BCC) when sending group emails so that the guest receiving the email cannot see email addresses of the other guests on your group email. If you're unsure on how to use the blind copying function when sending group emails, please contact Whitbread's Information Security help-desk.

I want to send a list of customer names and addresses by email. Is this ok?

Customer names and addresses are personal data and we must ensure these are kept secure at all times. Before sending the list via email or other means, please ensure that the appropriate security measures are applied. Please see Whitbread's Information Security policies as well as the Group Data Protection policy guidance documents for further guidance. If you are unsure, please discuss with your line manager before you send the list. Please make sure you read Whitbread's Information Security policies as well as our Group Data Protection policy guidance documents.

Our Environment and Communities

FORCE FOR GOOD

Our strategy is split into three pillars, enabling people to live and work well.

OPPORTUNITY

A team where everyone can reach their potential – no barriers to entry and no limitations to ambition.

COMMUNITY

Making a meaningful contribution to the customers and communities we serve.

RESPONSIBILITY

Always operating in a way that respects people and the planet. Enabling people to live and work well.

Whitbread has always been about people, and we always will be. So, it makes sense that our sustainability programme is all about people too. It's called Force for Good; it's about helping everyone – our customers, team members and those we work with – to live and work well.

We focus on three areas to make this happen. First, we're committed to being a place where everyone can reach their potential with no barriers to entry and no limits to growth. We're committed to making a meaningful contribution to the customers and communities we serve. And we treat our people and planet with respect. How we treat people and the impact we have on our communities and environment is just as important as the experiences we provide. Force for Good supports us to create an even better place to work. It helps us serve customers today, and tomorrow, better than before. It helps us build brands that our customers love and trust. And helps us create a forward looking, sustainable and successful business.

For more information, please speak to a member of Whitbread's Sustainability team or visit our website at **www.whitbread.co.uk**



Business practices or standards of behaviour decision-making framework

You can deliver great customer experiences and conduct business with integrity knowing that Whitbread supports you in doing the right thing.

You play a critical role in protecting our values, our brands and our reputation and in ensuring that Whitbread has a great work environment.

If you are unsure of what to do in a situation, you have guidance available to you including our Business Practices and Standards of Behaviour.

When you believe something isn't right, it probably isn't. Please speak up and share your genuine concerns, knowing that Whitbread wants to hear them.

1. Identify the business conducted or ethical problem
2. List possible solutions (what could you do?) and any obstacles to resolving the problem.
3. Seek input from others (if appropriate)
4. Determine the best approach. (what should you do?)
5. Is it consistent with Our Values, Standards and any applicable law or regulations?
6. Would your approach embarrass you at Whitbread?
7. How would your approach look if published in the newspaper or online?
8. Would you be comfortable with the example it sets for future decisions?

If the path isn't clear, ask for guidance

Follow through on your decision

Frequently asked questions

How am I expected to use the code of conduct on business practices and standards of behaviour?

It is each team member's responsibility to follow the code of conduct which outlines the expected business practices and standards of behaviour and supporting policies so please ensure you read them carefully and understand them. If you have any questions or concerns, please speak to your line manager, or the person responsible for your area, straight away.

Failing to follow the code of conduct or any supporting policies may result in disciplinary action being taken against you, so it is very important to understand what is expected of you.

What is the Speaking Out Helpline?

Speaking Out services are provided by Safecall and can be used to report major business wrongdoing in a confidential and anonymous manner 24 hours a day, 365 days a year.

You can make a report by logging onto safecall.co.uk/whitbread

or calling

UK.....**0808 801 0351**
IRL.....**1800 910 351**

Where are all the policies referred to in the code of conduct?

All supporting policies can be found at **www.whitbread.co.uk/governance/reports-policies/** or on Whitbread's internal Intranet.

If you cannot locate the policy you're looking for, please speak to your line manager who will guide you to where it is or provide you with a copy.

May I call the Speaking Out helpline anonymously and will I get into trouble if I do this?

We understand there will be times where you prefer to remain anonymous, however, in sharing specific details, including your name and role, may assist the resolution of the issue being concluded more effectively. However, there will not be any consequences if you choose not to.

If someone is behaving in a way that's not in line with our business practices or standards of behaviour, we'd like to know about it. We assure you that your concerns will be taken seriously and dealt with in a fair and balanced way.

Frequently asked questions (continued)

Do you have an issue you would like to raise but you are not sure of the best route?

Use the below flowchart to help you. If you are nervous about raising any of the below, please be assured that you as an employee will be treated fairly and we take all concerns and feedback very seriously.

Is your concern about our own employment or how you have been treated?

Has a team member or manager treated you unfairly?

Has someone not followed the correct process which has negatively impacted you?

Have you been discriminated against?

Has there been an unfair change to your pay, shifts or hours?

As often, many of these concerns can be resolved in talking your line manager.

Please read the Grievance or other associated policies which can be found on the intranet to assist you in gaining a resolution.

If you have taken these steps but still require employee relations advice – managers can contact the **Employee Relations helpdesk on 01582 844344.**

Do you wish to raise a concern about a major business wrongdoing?

Is the concern relating to unethical, illegal or unsafe business practices like:

- Bribery / Corruption
- Theft / Fraud
- Mismanagement of funds
- Misuse of corporate assets
- Serious health & safety violations
- Serious environmental concerns
- Misleading marketing / advertising
- Data privacy breaches

If you answered yes to any of the above, you can make a report by logging onto **safecall.co.uk/whitbread** or calling

UK..... **0808 801 0351**
IRL.....**1800 910 351**

Do you have feedback about the business?

Do you have an idea to improve the companies' current structure, processes, systems or policies?

Do you have a possible solution to a challenge the business faces?

Do you have a question about a recent business decision or change?

Raise this to your Our Voice Employee Representative.

Your rep will take forward popular topics for discussion at the Employee Forum.

WHITBREAD

Whitbread Court, Houghton Hall Business Park, Porz Avenue, Dunstable, Bedfordshire, LU5 5XE
www.whitbread.co.uk/investors