



MILLENNIUM
HOTELS AND RESORTS
More than Meets the Eye

Policy & Procedure

GROUP HUMAN RIGHTS POLICY

HUMAN RESOURCES POLICY – GROUP HUMAN RIGHTS POLICY

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GROUP HUMAN RIGHTS POLICY

Millennium & Copthorne Hotels plc (“M&C” or the “Company”) is an international hospitality group that has a responsibility to uphold and protect the human rights of individuals working for it in the communities and societies where it operates. We recognise our requirement to contribute positively to global efforts to ensure human rights are understood and observed as far as is reasonably practicable.

This policy is available in all relevant languages in the locations where we operate.

1. SCOPE

Our Group Human Rights Policy (the “Policy”) applies to all colleagues, whether they are a full-time, part-time, contract or temporary employees, and extends to all our controlled businesses and associates that we operate with. Where we do not have a controlling interest, we will encourage business partners, including contractors, suppliers and joint venture partners, to apply this Policy.

2. PURPOSE OF THE POLICY

The aim of the Policy is to communicate to and enhance awareness with our customers, suppliers, investors, employees and the communities in which we operate, the ethical and social values we respect and our commitment to upholding human rights. By promoting sound ethical values and human rights principles we aim to be an aspiring business for people to join. The Company is dedicated to the adoption of internationally recognised human rights standards in its global operations and encourages its contractors and partners to demonstrate the same level of commitment to human rights.

Our human rights standards are based on international sources of law and aim to ensure a consistent world-wide adoption of the principles throughout the Group.

The United Nation’s Universal Declaration of Human Rights (“UDHR”) provides ‘*a common standard of achievement for all people and all nations*’ which M&C observes and promotes. The guidelines of the relevant International Labour Organisation (“ILO”) Conventions and UNICEF’s Convention for the Rights of the Child are also fundamental to instructing our policy provisions.

In line with United Nations’ Guiding Principles on Business and Human Rights, which set out global standards for preventing and addressing the risk of adverse impacts on human rights linked to business activity, we are focused on:

- Having a policy commitment to meet the responsibility to respect human rights;
- Engaging in due diligence to identify, prevent, mitigate and account for how the company addresses its human rights impacts;
- Avoiding complicity in human rights violations;
- Investigating allegations of adverse human rights impacts;
- Providing access to a grievance mechanism to raise concerns or identify potential human rights impacts; and
- Ensuring that such a grievance mechanism is accessible to representatives of the communities in which we operate and our supply chain.

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When applicable to do so, M&C will engage with the relevant communities and other stakeholders to better understand any questions or concerns about our activities and their possible impact. The evidence of such stakeholder consultation will be documented and reported.

3. HUMAN RIGHTS PRINCIPLES

M&C has adopted a series of human rights principles across all of its businesses.

a) Anti discriminative attitudes and respect for ethical values

- All M&C employees should conduct themselves in accordance with the highest ethical standards.
- Our aim is to ensure that no discrimination is practised within M&C. We have adopted an “equality for all” policy to prevent discrimination in hiring, compensation, promotion, training, termination or retirement based on race, caste, colour, national origin, sex, age, religion, disability, veteran’s status (United States), marital status, actual or perceived sexual orientation, employment status or political affiliation.
- Our aim is to ensure that M&C employees are able to work in an environment free of physical, psychological or verbal abuse, the threat of abuse and sexual or other harassment and, accordingly, these are prohibited.

b) Employee Rights

Health and Safety

- Employment is freely chosen. No forced or bonded labour is permitted.
- Guided by applicable standards, the prevailing knowledge of the industry and any specific hazards, our aim is to provide a safe and healthy working environment for all M&C employees.
- We take reasonable steps to:
 - prevent accidents and injury to health arising out of, associated with or in the course of work, by minimising so far as is reasonably practicable, the causes of hazards inherent in the working practice and environment; and
 - provide our employees with a safe and secure environment for their work.
- All employees shall receive the necessary health and safety training for their line of work.
- Access to clean facilities, drinkable water and, if appropriate, sanitary facilities for food storage shall be provided.
- We provide a secure and confidential means of giving feedback to management without fear of reprisals in accordance with our Whistleblowing Policy.

Wages

- Employees shall be paid wages and benefits, for a standard working week that meet or exceed the minimum national requirements.
- On being employed by the Group, employees shall be informed of their employment conditions in written and understandable format with respect to wages and the circumstances of each payment.

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- Disciplinary deductions of wages are not permitted except with the consent of the employee concerned.

Working Hours

- The working hours of M&C employees shall comply with applicable laws.
- We operate flexible working practices recognising the need for employees to balance their working life with other interests and responsibilities as far as is reasonably practicable within the constraints of effectively running the business.

Freedom of Association and the Right to Collective Bargaining

- The national and other applicable laws and regulations concerning an individual's freedom of association shall be complied with at all times.
- We shall not discriminate against employees' legal bargaining representatives.

c) Prohibition of Child Labour

We support the long-term objective to eliminate child labour globally, being consistent with the United Nations Convention on the Rights of the Child and the relevant ILO Conventions. No children are to be employed directly by M&C.

d) Risk Assessments

As part of our standard due diligence and on-going risk assessment procedures, we look to identify, prevent, mitigate and account for how the company addresses its human rights impacts.

e) Grievance Mechanisms

Procedures are in place to enable colleagues to raise, in confidence, matters of serious concern in areas such as human rights violations.

We recognise the importance of such grievance mechanisms being accessible to representatives of the communities in which we operate and suppliers can raise any concerns through our dedicated email address at supplychain@millenniumhotels.com

f) Responsibilities

The Group Chief Executive Officer is accountable for compliance with the Policy within our wider framework of managing corporate responsibility.

Regional Operations Heads and General Managers must know the UDHR and establish appropriate responsibilities and procedures within their business units and ensure that the Group Director of Human Resources is informed of any issues arising in countries where we are operating.

We expect employees to maintain the highest standards in conformity with these principles. Disciplinary measures shall be enforced against any M&C employee who is in breach of these human rights principles.

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If colleagues have concerns about any instance of malpractice, human rights abuses or discrimination, they have a responsibility to raise them through their line manager in the first instance or, if this is not practical, the confidential ‘Whistleblowing’ helpline at the earliest possible opportunity.

The Policy was approved by the Board of Directors of M&C on 16 February 2017.

Additional references

- United Nation’s Universal Declaration of Human Rights – <http://www.un.org/en/documents/udhr/>
- International Labour Standards – <http://www.ilo.org/global/standards/lang--en/index.htm>
- UNICEF’s Convention for the Rights of the Child – <http://www.unicef.org/crc/>

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