

2021 Questions for Hotel Companies
Migrant Worker Rights

Please complete the questions on your company's operations in Qatar. For all answers please ensure you provide as much evidence as possible and links to all policies referenced if publicly available.

Scope of operations

- Please describe the scope and structure of your company's operations in Qatar in the table below, including the business model each hotel operates under (owned and managed; leased; managed properties; franchised properties; joint ventures; other).

No.	Name of hotel	Business model	Property owner
1	Steigenberger Doha	Managed	Abdullah Althani
2			
3			
4			
5			

Workforce data

- Please complete the table below with workforce data.

Employment type	Total number of people	Male	Female	Main nationalities / countries of origin
Directly employed	1	1	0	
Employed by property owner	140	104	36	Phillipines, India, Srilanka, Indonesia, Tunisia, Morocco, Nepal
Employed by subcontractors (e.g. service providers or labour suppliers)	40	40		
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)				

If the exact breakdown is not available, please provide % estimate of workers employed directly and those subcontracted.

- Please complete the table below with labour supply data.

No.	Labour supply company	Nature of work eg. Cleaning, housekeeping, security	Total number of people
1	TBA	Security	10
2			

3			
4			
5			

If the exact breakdown is not available, please provide % estimate of workers provided by each company.

Human rights and due diligence

4. Does your company have a publicly available policy commitment to respect human rights in its operations and throughout its business relationships which specifically addresses workers' rights and references relevant human rights standards (e.g. UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, ILO core labour conventions)¹. Yes/No. If yes provide link.

<https://www.deutschehospitality.com/en/company/code-of-conduct>

5. Does your company have a human rights due diligence process for identifying and prioritising workforce risks in its operations and throughout its business relationships specifically in Qatar? Yes/No. If yes, please explain this process and highlight the top three workforce risks you identified.

Relates to questions 4, 5

HR Response:

Human rights and due diligence is carried out in line with the following:

1. Deutsche Hospitality's code of conduct and Ethics :
https://www.deutschehospitality.com/docs/p17_0001_deutsche_hospitality_code_of_conduct_en_202011.pdf
2. **Regional Workforce Rights Protection policy:** Under its scope adherence of hotels under the umbrella of SDMCC with Deutsche Hospitality's Code of Conduct – Global Responsibility and Business Ethics. All business units always should endeavour to protect the Human Rights and Dignity of their workforce and create an environment of diversity and inclusion.

This policy also encompasses the general framework of human rights of all employees in line with international practices and country/region specific laws.

This policy is applicable to all employees employed directly as well as outsourced labour force employed by the business unit.

3. Workforce Risk working in the hotel is mitigated by providing them a safe working environment, this is ensured by **Colleague Health and Safety Policy** which entails proper HSE and FLS procedures. Further this policy also covers the workers who work in harsh summer conditions by underlying proper break and hydration procedures.
4. Currently, we have identified health and safety as one of the main risks. As we are currently sourcing our workforce directly in the country, the risk due to agencies is rather low. We will reassess this, when appropriate. A detailed re-assessment will follow, once the hotel has opened.

¹ According to the [UN Guiding Principles on Business and Human Rights](#), the term “business relationships” encompasses business partners, entities in the company's value chain, and any other State or non-State entity directly linked to its business operations, products, or services. This includes entities in its supply chain beyond the first tier, and indirect as well as direct business relationships. The business partners we are primarily interested in for the purposes of this survey are hotel property owners, management companies, labour suppliers, and service providers.

Business relationships and human rights:

6. When selecting business partners, does your company consider how potential partners treat migrant worker rights? Yes/No. If yes, please detail your vetting process for selecting subcontractors and hotel owners. Is consideration given to recruitment fees, wages, general working and living conditions, and health and safety? Are these considerations weighted against cost? What percentage of business relationships are rejected due to risks?
7. Does your company require hotel property owners and subcontractors in Qatar to comply with your human rights and other rights-related policies and procedures (eg. through contract clauses, brand standards)? Yes/No. If yes, please provide link to this policy or other evidence for both property owners and subcontractors. How do you ensure they understand the requirements (e.g. through trainings and workshops) and what mechanisms do you employ to monitor compliance and hold them accountable?

- Relates to questions 7,6
- Under SDMCC Workforce Rights protection policy, hotels are required to ensure that all third-party vendors are aware of company's code of conduct and it is required that the contracts entered with third parties also have necessary inclusions from the DH Code of Conduct.
- Local HR departments are also encouraged to maintain contact with outsourced workforce to ensure that their rights are protected.
- In case of violations, these are escalated to the hotel management and to SDMCC, and the contracts with such vendors are terminated.
- Our contracts include brand standard clauses to ensure that policies such as the DH Code of Conduct apply

Recruitment

8. Does your company have a publicly-available policy which requires that no worker in its operations or supply chains should pay for a job, and that the costs of recruitment (i.e., recruitment fees) should be borne by the employer ("Employer Pays Principle")? Yes/No. If yes, please provide link to the policy.

<https://www.deutschehospitality.com/en/company/code-of-conduct>

9. Please describe the due diligence process you undertake to ensure that your recruitment standards are applied. In your answer please address specifically:
 - a) Whether you carry out due diligence on recruitment agents in sending countries? Yes/No. If yes, provide details.
 - b) Whether you conduct interviews with workers prior to employment to establish if fees have been paid? Yes/No. If yes, please provide details including percentage of workers you interview.
 - c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe.
 - d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process.

10. How many instances of recruitment fees paid by workers has your due diligence processes uncovered in 2019 and 2020, and how much (if any) was paid back to workers during this period. What percentage of your workforce were found to have paid fees? Not applicable as hotel has not opened, yet

Relates to question 9

Under the guidelines of the SDMCC recruitment policy:

All cost of onboarding the selected candidates must be borne by the receiving Business unit (both for internal as well as external candidates). At no point should be business unit charge any recruitment cost to the candidates for onboarding. The only exception to this may be:

- i. Attestation of documents in home county of the candidates
- ii. Renewal of any documents required for visa process
- iii. Pre-medical tests prescribed by the authorities.

Use of Recruitment Agencies

- Whilst the focus for all business units should be on inhouse resources and using locally available and internal workforce, however certain situations demand use of external recruitment agencies.
- When choosing any such agency, their authenticity must be ascertained, this can be done by ensuring that they are licensed to operate in the country that they exit.
- It must be ensured that the agency is working in line with the guidelines of SHA and DH-COC, where possible relevant documents or testimonials may be asked.
- Clear and precise contracts should be drawn with these agencies and the contracts should have relevant references to DH – COC and SHA.
- The contracts should also clearly mention that no recruitment cost should be charge by the agency towards the candidates. Any recruitment charges would be borne by the business unit which has contracted the agency for the supply of resources.
- Prior to engaging any agency or undertaking a recruitment trip a clear mandate of requirement should be provided to the Agencies in written.
- During the interview process the HR representative may ask the candidate if they are being charged for any recruitment fees.
- Where an agency is found to be charging the candidate with any form of fees, the contract should be terminated with immediate basis.
- The respective Business Unit HR must ensure that such agencies are reported to regional SDMCC office as well as the Corporate Human Resources for the purpose of blacklisting them for future use.

Payment & wages

11. What is your company's process for determining workers' wages in Qatar, and what benchmarks does it use to set wage levels (e.g. do you have a non-discrimination and/or living wage policy; if so please provide)? Please explain how these policies apply to subcontracted workers including how you monitor this and whether you collect data on wages paid by subcontractors.

12. How does your company ensure that workers are paid on time and in full, including for overtime and without illegal deductions? How does this apply to subcontracted workforces? What steps does the company take when your labour suppliers or subcontractors fail to pay workers on time and in full (please illustrate this with specific examples)?

Relates to question 11, 12

Under the SDMCC Wage Protection Policy:

Wage Determination

- All business units must ensure that the wages paid to their staff are in line with the wage structure in the country/region of operation and in line with the competition.
- For above the business units, may participate in annual wage surveys carried out by third party vendors.
- Business units can also conduct a wage survey with competition, however, should be mindful of data protection when sharing sensitive information, for this purpose a salary range should be shared.
- Any such survey should be carried out by prior consent of SDMCC and format should be shared.
- SDMCC may also conduct a regionwide wage survey by engaging third party vendors, under such condition the cost of the survey would be split across business units to which the survey applies.

Wage protection for outsourced and Contracted Employees.

- All business units must ensure that the rights of wage protection for outsourced and contracted employees are protected.
- While contracting third party vendors, it must be ensured that they are aware of the company's code of conduct and wage protection policy.
- All third-party contracts should include wage protection clauses and where possible for hotel to audit the payment of wages on an adhoc basis.
- Local business unit Human Resources must at all time maintain close contact with the outsourced labour workforce to check if they are being paid on time and in line with their employment agreements.

Payment of wages

- All business units must ensure that all employees are paid their wages in line with their formal employment contracts signed by both parties.
- The employment contract should clearly document the breakdown of wages payable to the colleague in line with the payment cycle mentioned.
- A monthly payroll register with a breakdown of wages for each colleague should be maintained by each business unit.
- At the time of payroll processing every month, the payroll sheet should be verified and by Finance, Human Resources and the Executive Office.
- Where possible the business units must ensure that they have bank accounts for the colleagues where the wages may be transferred.
- In countries where WPS is applicable all payments should be done through the WPS system.
- Where wages are being paid in cash, this should only be done through the finance

department of the business unit with proper documentation signed by each party.

- Finance department must ensure that they have the cash paid wages document filed for the purpose of Audit.

Redundancy of workers due to COVID-19

13. If your company, your subcontractors, or other business partners terminated contracts of workers in your hotels during the COVID-19 pandemic, please state how many workers in total were terminated during 2020 and what percentage of the workforce this represents. Please provide figures for your own operations and that of your subcontractors and business partners, including hotel owners.
14. Please explain the process undertaken to decide which workers would be terminated and what, if any, non-financial assistance was provided to terminated workers (that was not part of their termination package e.g. plane tickets home) that went beyond that prescribed by the Qatari Government. What policies and processes (if any) did you implement to ensure that a fair process was conducted for workers employed by subcontractors, and how did you monitor this?
15. If, and when, workers were terminated, what financial packages/compensation were given to them? What packages/compensation were provided to subcontracted workforces and how did you monitor this?

Not Applicable as the hotel has not opened, yet.

Document retention, job mobility & freedom of movement

16. How does your company ensure that workers have free and secure access to their passports and identity documents? How does this apply to subcontracted workforces? What steps does the company take when you discover that workers subcontracted at your hotels do not have sole, secure access to these personal items?
17. How does your company ensure that workers are free to change jobs at will and without penalty? How does this apply to subcontracted workforces?

In your answer, please provide information on the following:

- Are there any restrictions based on type or length of contract?
 - How many workers have made requests to change employer using the new Ministry of Labour sponsorship transfer process and how many of these transfer requests were granted?
 - Do workers have to comply with any additional administrative requirements applied by the employer to change jobs?
18. Do you have a policy that specifies workers should not be subject to restrictions on movement, including curfews in provided accommodation? Yes/No. If yes, please provide the policy or other evidence. If there are curfews, are there any differences in treatment of men and women? Yes/No. Does your policy apply to subcontracted workers?

Relates to question 16-18

Document Access:

- All business units must ensure that colleague's always have free access to all their documents.

- No business unit under the umbrella of SDMCC should hold on any personal documents of the employees which include but are not limited to:

Passport

Government Identity Cards

Medical Insurance Cards

Original Certificates

Hotel Identity Cards

Driving Licence

Any other personal document

- Where required a copy of these documents can be kept in personnel file for reference.
- The employee may ask the business unit Human Resources to store their passport for safe keeping. Under such circumstance an employee must give a written consent to this.
- Human Resource department must ensure that such documents are kept in fireproof safe and should have CCTV coverage of such area.
- When kept under the safe keeping of Human Resources the employee still has access to their documents at any given moment. While releasing the document back to the colleague HR must ensure that they a release form signed.
- Where these documents are required by the HR for the purpose of administrative purposes such as renewal of visa or any other government procedure, the colleague must promptly submit the originals (where required) to the HR.
- The colleagues must ensure that they submit a copy of any of their renewed documents to the human resources department for the purpose of filing and tracking expiry where necessary.

Colleague Mobility

- All business units must ensure that any colleague has a free will to change employment without any pressure or hindrance.
- In line with the above the colleague must ensure that his/her exit from the business unit is in line with their employment contract and the applicable labour laws.
- When a colleague wishes to leave/resign from the business unit, this should be accommodated in a friendly and professional manner in line with the local laws and legislations.
- Human Resource department must strive to find out the reason for leaving and where possible look at measures if the colleague can be retained.
- Where retention is not possible, the human resource department should facilitate the exit clearance and prepare necessary documentation. Human Resource department must ensure that all exit formalities are done in line with the applicable local laws.
- A formal exit interview should be conducted with the colleague to get feedback for their tenure in the company. This should be documented and kept in the personnel file.

Business partners/Service providers:

- SDMCC expects all business units to carry out thorough due diligence while contracting any third parties for the supply of workforce with regards to workforce access to their documents and mobility.
- Business units must always ensure that rights of any outsourced labour force employed

by them are protected.

- While contracting third party vendors, it must be ensured that they are aware of the company's code of conduct and ethics policy.
- All third-party contracts should be drawn in line with the Deutsche Hospitality's code of conduct and relevant sections from this code must be incorporated in the formal contract.
- Local business unit Human Resources must at all time maintain close contact with the outsourced labour workforce to check on their wellness and rights adherences.
- Where anomalies are found these should be reported immediately to the business unit's management team and to the property General Manager.

Health & safety

19. Do you have specific policies and protocols to manage outdoor work (e.g. security, gardening, cleaning) and prevent the risk of heat stress beyond implementation of the national summer working hours ban? Yes/No. If yes, please provide the policy or other evidence. Does this apply to subcontracted workers? Yes/No. If yes, please provide policy or other evidence.
20. Do you have policies and procedures in place to protect workers from becoming infected with the COVID-19 virus? Yes/No. If yes, please policy or other evidence. Does this apply to subcontracted workforces? Yes/ No. If yes, please provide the policy or other evidence.

Relates to questions 19,20

HSE and FLS:

- All business units must ensure that they have appropriate HSE and FLS policies in place, these policies should be in line with the DH corporate standards as in line with the standards and specification of the country of operation.
- Business units must ensure that HSE and FLS policies are a part of new hire orientation to ensure that all colleagues are aware of their safety and potential risks.
- Regular HSE and FLS audits should be conducted at hotel level by competent personnel (Engineering and Security departments)
- All Business Units must ensure that they conduct a mock fire drill at least once every quarter and a report of this should be maintained on file for the purpose of audit.

Working Outdoors

- Colleagues working in harsh summer weather conditions especially summer months, should be provided with appropriate uniforms for their comfort.
- It must be ensured that these colleagues are always hydrated, for the purpose of this the HR and the Department Heads must ensure that ample amount of Hydration fluids are available to these colleagues in proximity.
- Colleagues should be provided with periodic small breaks to allow them to hydrate themselves. These breaks should be in line with the local legislation.

- In countries where local legislation doesn't define hydration break periods during summer months, colleagues should be provided hydration breaks at least every 2 Hours.
- Business units may at their discretion, change the frequency of such breaks, however they should not exceed the minimum norm as mentioned in point 3.4. (see respective policy)
- HR representative must ensure that they carry out regular audits of outdoor areas to ensure that colleagues have access to hydration fluids and are being given appropriate breaks.
- Hotels may also provide a heat allowance to colleagues working during the harsh summer months. This allowance is limited to the summer months and should be paid along with the monthly wages.

Workforce Safety During Pandemic

- In the event of any pandemic, business units must ensure that safety of their colleagues.
- Appropriate isolation and medical aid should be made available to all colleagues including contracted employees.
- Business units must ensure that they adhere to all guidelines provided by the government and any guidelines that may be provided by the DH corporate offices.
- Proper sanitization should be carried out throughout the hotel premises as well as the staff housing facilities.
- Cleanliness, Sanitization and Temperature logs should be maintained at the hotel as well as the staff housing facilities.
- Colleagues must be equipped with proper PPE (Personal Protection Equipment) kits while dealing with the guests.
- Colleagues assigned to BOH areas must also ensure that they are following the guidelines provided by the local authorities.
- Any colleague showing symptoms should be immediately sent to a testing facility and isolated.
- Business units must ensure that a weekly report of all colleague and guest infections are shared with SDMCC regional offices, who in turn would keep the corporate offices in Germany informed.

Living conditions

21. Please provide your company's standards for workers' living conditions (Please provide policy or other evidence). What steps does the company take to monitor the performance of subcontractors and labour suppliers to house workers against company and government standards? What remedial action is taken if these standards are breached?
22. Please describe any changes you made to workers' living conditions in response to the COVID-19 pandemic. Do these apply to subcontracted workers? Please detail how you monitored compliance with any new COVID-19 specific requirements specified by your policies or by the Qatari Government.

Relates to question 21
Health and Safety at staff housing

- All housing facilities should be always HSE and FLS complaint in line with the local legislations and DH corporate directives.
- Housing facility should have regular cleaning and sanitization schedules in place.
- Monthly housing inspections should be carried out by the accommodation team or the human resources representative and a report should be filed for audit purposes.
- Hotel engineering and security teams should also conduct regular HSE and FLS Audits at the housing facility.
- Hotel General Manager and Management should conduct monthly surprise visits to the housing facility to ensure compliance of all health and safety aspects.
- At least one mock fire drill should be conducted at the housing facility at least once every six months.

Business partners/Service providers:

- Business units must ensure that all outsourced colleagues contracted with the hotels are being provided with safe and comfortable housing facilities.
- HR must ensure that they conduct a site visit of these facilities to check for compliance to standards.
- Service providers must ensure that there are proper safety and sanitization processes in place in their living premises.
- All third-party contracts should be drawn in line with the Deutsche Hospitality's code of conduct and this policy and be incorporated in the formal contract.
- Local business unit Human Resources must at all time maintain close contact with the outsourced labor workforce to check on their wellness and rights adherences.
- Where anomalies are found these should be reported immediately to the business unit's management team and to the property General Manager.

Prevention of discrimination, physical and sexual abuse, exploitation and harassment

23. Does your company have the following policies:

- On the prevention of bullying, discrimination and physical abuse of workers, by fellow workers and/or hotel clients in its operations and business relationships? Yes/No. If yes, please provide the policy or other evidence.
- On the prevention of sexual abuse, exploitation, and harassment by fellow workers and/or hotel clients in its operations and business relationships. If yes, please provide the policy or other evidence.

Above is a part of DH – Code of Conduct. Every new joiner is provided with a copy of the code of conduct.

Code of Conduct is also published in prominent places within the hotels.

During employee orientation, the clauses of the code of conduct are also explained to all new joiners.

24. Please provide the following information on the systems in place for reporting, investigating and redressing cases of abuse:

- How are workers made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?

Company's code of conduct is given and explained to every new joiner
Company policies are also explained during departmental orientation for new joiners
Every new joiner undergoes a company orientation program, where policies are also explained.

- How are business partners are made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?

Business partners are made aware of company policies during contract negotiations. Where applicable certain points in adherence to company policies are also part of the contracts.

- Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse?

All colleagues, fulltime and subcontracted have access to HR department of the hotel. They can either directly approach the HR or also contact them anonymously.
Company's code of conduct also encourages colleagues to report any abuses or rights violations.

- What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?

All interactions and information is kept anonymous.
Investigations are conducted by the hotel Human Resources Department independently
Investigation reports are shared with the Hotel General Manager and SDMCC.

- What support you provide workers who make a claim of sexual abuse, including by hotel clients? including to file a criminal complaint, seek medical care, and pursue redress against a perpetrator, such as a hotel client? Does any provision of support also apply to subcontracted workers?

Hotel provides all the support necessary to affected colleagues.
Where required physiological and medical assistance is also provided
Hotel also assists the colleagues with contacting and liaising with the authorities.

25. How many grievances were raised by workers in 2019 and 2020 in relation to:

- Bullying, discrimination, physical abuse in its own operations?
- Bullying, discrimination, physical abuse in its subcontracted workforce?
- Sexual abuse, exploitation, and harassment in its own operations?
- Sexual abuse, exploitation, and harassment in its subcontracted workforce?

Data not available as the hotel isn't open yet

Representation & remedy

26. How many of your hotels in Qatar have worker committees or an equivalent mechanism for worker organising? How are worker representatives selected? Do the committees cover subcontracted workers?

There are no formal workers committees or equivalent, as these are not provisioned under the labour law of the state.

However, at a hotel level informal committees may be formed under the guidance of human Resources.

27. In line with the UN Guiding Principles on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? How are workers made aware of this mechanism? How are subcontracted workers made aware of this mechanism?

Yes, please refer to the company's code of conduct.
<https://www.deutschehospitality.com/en/company/code-of-conduct>

28. How many grievances were raised by workers in 2019 and 2020 in relation to:

- Recruitment costs?
- Wages?
- General working or living conditions?
- Health and safety?
- How many of these grievances were raised by subcontracted workers?

Data not available as the hotel isn't open yet.

Other information

29. Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in the Gulf region, including any challenges it faces in doing so?

Recruitment Policy	
Applicable to	All Hotels under Steigenberger DMCC
Policy Owner	Vice President Steigenberger DMCC Regional Human Resources - Steigenberger DMCC Hotel Human Resources
Effective Date	01-February-2021
Related Documents	Deutsche Hospitality Code of Conduct https://sustainablehospitalityalliance.org SDMCC Recruitment Process Flow RRF – Recruitment Requisition Form Reference Check Form E-Mail offer template Employment Contract Sample
Definitions and Abbreviations	SDMCC – Steigenberger DMCC Business Unit – Any Hotel/entity under the umbrella of Steigenberger DMCC SHA – Sustainable Hospitality Alliance DH – Deutsche Hospitality COC – Code of Conduct

Scope:

Deutsche Hospitality is a member of Sustainable Hospitality Alliance (SHA). The purpose of this policy is to ensure that all Business Units under SDMCC align their recruitment practices under the principles of SHA as well as the Deutsche Hospitality's Code of Conduct and Ethics and based upon the pillars of:

Global Responsibility:

We are dedicated to creating a workplace that values and respects people from all over the world and enables our employees to put in their best.

Diversity and Inclusion:

We are a company of diverse cultures serving diverse guests. We value our colleagues as unique individuals and respect the different ideas, perspectives and energy they bring into the company. To support this, we have created an inclusive culture where people are encouraged by themselves.

Policy:

1. Recruitment Process:

- 1.1. All business units must adhere to DH – COC and ethical recruitment practices in line with the principles of SHA.

- 1.2. It is understandable that certain countries do have restrictions on certain nationalities based upon visa restrictions. Where such conditions exist, clear documentation should be in place this could be in the form of government released gazettes or labour office released documents.
- 1.3. Business units may have their local recruitment policies, however the framework of these should be in line with the framework of this policy. For avoidance of any doubts SDMCC regional offices may be contacted when formulating such a policy.
- 1.4. All open vacancies have to be pre-authorized and have to go through an approval process, this includes a Recruitment Requisition Form duly signed by Human Resources, Finance and General Manager.
- 1.5. Out of budget positions for management level, may require a business case proposal to be submitted to regional office for the approval of Vice President and Human Resources.
- 1.6. Candidates for Hotel Executive Committee level recruitment must be shared with the SDMCC Human Resources and Vice President.
- 1.7. Candidate at Executive Committee Team must also be presented to the respective Department in the Corporate offices, where they may be interviewed by the business in-charge. This must be vetted and routed through the SDMCC offices.
- 1.8. Upon approval of the RRF, the positions should be posted on the company's Pre-Screen application with the clear job description and candidate specification. These positions must also be posted on individual business unit Human Resources Notice boards to encourage internal applicants.
- 1.9. Where Pre-Screen application is not available, positions may be posted on local recruitment portals. In such business units the HR should also contact corporate Human Resources to see if there are candidates available internally.
- 1.10. When recruiting for a new position at any business unit the priority should be based upon the below:
 - (i) Business Unit based internal candidates based upon the succession plan document for each business unit.
 - (ii) Company based internal candidates based upon applications from Pre-Screen or recommendations of the corporate Human Resources based upon internal candidate pool.
 - (iii) External candidate profiles obtained from Pre-Screen or local recruitment portals.
- 1.11. All cost of onboarding the selected candidates must be borne by the receiving Business unit (both for internal as well as external candidates). At no point should be business unit charge any recruitment cost to the candidates for onboarding.

2. Making Offers

- 2.1.** Before making any offers, business unit HR must ensure that appropriate reference and character checks have been received by them.

For purpose of clarity this process should include:

- i. Two reference checks, with at least one being from the last employer.
 - ii. Where possible the reference checks must be obtained on a standard reference check document.
 - iii. In certain cases and for senior recruitment, e-mail reference and character checks may be acceptable. In this case a telephonic reference check may also be acceptable.
 - iv. In case of junior recruitment, where the references are unable to provide written content, the business unit HR may conduct a telephonic reference check by filling up the form and signing it off.
 - v. All reference checks must be clearly documented, dated and signed.
- 2.2.** Once the candidate selection has been made, they should be sent concise offer letter outlining the position, salary and general benefits.
- 2.3.** Upon acceptance of this offer a formal employment contract should be drawn which should be signed by the business unit, Human Resources, Finance and General Manager.
- 2.4.** Offer letters/e-mails and employment contract should clearly indicate the time required by the candidate to approve of their acceptance in writing post which they would become null and void.

3. Use of Recruitment Agencies

- 3.1.** Whilst the focus for all business units should be on inhouse resources and using locally available and internal workforce, however certain situations demand use of external recruitment agencies.
- 3.2.** When choosing any such agency, their authenticity must be ascertained, this can be done by ensuring that they are licensed to operate in the country that they exit.
- 3.3.** It must be ensured that the agency is working in line with the guidelines of SHA and DH-COC, where possible relevant documents or testimonials may be asked.
- 3.4.** Clear and precise contracts should be drawn with these agencies and the contracts should have relevant references to DH – COC and SHA.
- 3.5.** The contracts should also clearly mention that no recruitment cost should be charge by the agency towards the candidates. Any recruitment charges would be borne by the business unit which has contracted the agency for the supply of resources.
- 3.6.** Prior to engaging any agency or undertaking a recruitment trip a clear mandate of requirement should be provided to the Agencies in written.

- 3.7. During the interview process the HR representative may ask the candidate if they are being charged for any recruitment fees.
- 3.8. Where an agency is found to be charging the candidate with any form of fees, the contract should be terminated with immediate basis.
- 3.9. The respective Business Unit HR must ensure that such agencies are reported to regional SDMCC office as well as the Corporate Human Resources for the purpose of blacklisting them for future use.

4. Publishing Vacancies

While publishing any vacancies online or through any other medium following must be adhered to:

- 4.1. All vacancies must be posted with clear job description of the position and a clear indication of the person specification.
- 4.2. At no point should be job description or person specification should indicate towards race, ethnicity, gender, religion or creed.

5. Closing Vacancies

- 5.1. Once a candidate has been offered and position closed, business unit Human Resources must ensure that the vacancy is closed on the portals that these have been published.
- 5.2. Candidates who have not been selected should be sent regret messages, where possible with available reasoning.
- 5.3. The regret letter should also encourage candidates to visit the DH careers websites to view and apply for all future vacancies.

Conclusion Notes:

- This policy has been drafted to outline the recruitment process for all business units under SDMCC in line with SHA and DH-COC.
- Business units must ensure that the content of this policy is applied to all their recruitment procedures and any local recruitment policy should be aligned to it as well.
- Where there are any deviations to this policy, it should be informed to the SDMCC regional offices.
- Where a local business unit sees the need to implement additional clauses to apply SHA and DH-COC, they are encouraged to do so by informing SDMCC regional offices.
- Any clarity or doubts regarding this policy should be directed to SDMCC offices via written communication.

Approval Matrix	
Approved by	Siegfried Nierhaus
Designation	Vice President Steigenberger DMCC
Signatures	

Workforce Rights Protection Policy	
Applicable to	All Hotels under Steigenberger DMCC
Policy Owner	Vice President Steigenberger DMCC Regional Human Resources - Steigenberger DMCC Hotel General Managers Business Unit Human Resources
Effective Date	01-February-2021
Related Documents	Deutsche Hospitality Code of Conduct
Definitions and Abbreviations	SDMCC – Steigenberger DMCC Business Unit – Any Hotel/entity under the umbrella of Steigenberger DMCC

Scope:

The purpose of this policy is to align the hotels under the umbrella of SDMCC with Deutsche Hospitality's Code of Conduct – Global Responsibility and Business Ethics. All business units at all times should endeavor to protect the Human Rights and Dignity of their workforce and create an environment of diversity and inclusion.

This policy also encompasses the general framework of human rights of all employees in line with international practices and country/region specific laws.

This policy is applicable to all employees employed directly as well as outsourced labour force employed by the business unit.

1. Employees:

- 1.1 All business units must ensure that international practices of human rights are implemented in every area of the business.
- 1.2 Rights of the employees must be adhered to in line with the international regulations as well as the labour laws of the respective country from where the business unit operates.
- 1.3 All employees should be treated equally and with respect.
- 1.4 Employees at all the time must have access to human resource professional at property level to raise any concerns or violations.

- 1.5 Human Resource department in each business unit should to the best of their abilities be able to explain the employees their rights in line with international practices as well as in the local labour laws.
- 1.6 Where the employee feels that their rights are not being adhered to and their concerns not being addressed at business unit level, they can follow the escalation matrix, by reporting any such incident directly to SDMCC, regional human resources or by contacting the Deutsche Hospitality Corporate Human Resource department.
- 1.7 Any such escalation received must be investigated with due diligence and a report containing the facts and findings must be submitted to regional Vice President.
- 1.8 Where any such contraventions to rights occur, SDMCC must also inform the corporate human resource department by sharing the relevant investigation reports.
- 1.9 All such reports should be properly documented and filed for purpose of future reference or to support and sort of litigation claims.
- 1.10 Business unit level Human Resources must ensure that a copy of Deutsche Hospitality's code of conduct is given to every existing employee as well as new joiners at the time of their onboarding.

2. Business partners/Service providers:

- 2.1 SDMCC expects all business units to carry out thorough due diligence while contracting any third parties for the supply of workforce.
- 2.2 Business units must always ensure that rights of any outsourced labour force employed by them are protected.
- 2.3 While contracting third party vendors, it must be ensured that they are aware of the company's code of conduct and ethics policy.
- 2.4 All third-party contracts should be drawn in line with the Deutsche Hospitality's code of conduct and relevant sections from this code must be incorporated in the formal contract.
- 2.5 Local business unit Human Resources must at all time maintain close contact with the outsourced labour workforce to check on their wellness and rights adherences.
- 2.6 Where anomalies are found these should be reported immediately to the business unit's management team and to the property General Manager.
- 2.7 Where possible the business units must ensure that site inspections are done before engaging with any contractor to ensure adherence to human rights practices.
- 2.8 Any violations should be documented and reported to the hotel management team, who in-turn should notify the SDMCC offices.

- 2.9 Any contractor found in violation of workforce rights should be immediately served a termination notice and where possible reported to relevant authorities.

Conclusion Notes:

- This policy has been drafted to outline the workforce rights protection for all business units under SDMCC in line with SHA and DH-COC.
- Where there are any deviations to this policy, it should be informed to the SDMCC regional offices.
- Where a local business unit sees the need to implement additional clauses to apply SHA and DH-COC, they are encouraged to do so by informing SDMCC regional offices.
- Any clarity or doubts regarding this policy should be directed to SDMCC offices via written communication.

Approval Matrix	
Approved By	Siegfried Nierhaus
Designation	Vice President SDMCC
Signatures	

Colleague Wage Protection Policy	
Applicable to	All Hotels under Steigenberger DMCC
Policy Owner	Vice President Steigenberger DMCC Regional Human Resources - Steigenberger DMCC Hotel Finance Team DMCC Finance Hotel General Managers Hotel Human Resources
Effective Date	01-February-2021
Related Documents	Deutsche Hospitality Code of Conduct
Definitions and Abbreviations	SDMCC – Steigenberger DMCC Business Unit – Any Hotel/entity under the umbrella of Steigenberger DMCC WPS - Wages Protection System is an electronic salary transfer system that allows institutions to pay wages via banks and financial institutions approved and authorized to provide the service. Minimum Wage: A minimum wage is the lowest remuneration that employers can legally pay their employees

Scope:

The purpose of this policy is to ensure that the wages of all employees of DH in the region (regular and contracted) are protected and timely and in line with the legal framework of the respective country of operation.

Deutsche Hospitality also endeavors that similar circumstances are available to the subcontracted employees and the employees working for the business units through third party vendors.

1. Minimum Wage:

Although the minimum wage set may vary with respect to the country of operation for the business unit, which should be applied at all times. For countries that do not have a minimum wage set SDMCC Minimum Wage would apply which is set to 228.27 Euros (equivalent of AED 1,000)

2. Wage Protection and payment of wages

- 2.1 All business units must ensure that all employees are paid their wages in line with their formal employment contracts signed by both parties.
- 2.2 The employment contract should clearly document the breakdown of wages payable to the colleague in line with the payment cycle mentioned.

- 2.3 A monthly payroll register with a breakdown of wages for each colleague should be maintained by each business unit.
- 2.4 At the time of payroll processing every month, the payroll sheet should be verified and by Finance, Human Resources and the Executive Office.
- 2.5 Where possible the business units must ensure that they have bank accounts for the colleagues where the wages may be transferred.
- 2.6 In countries where WPS is applicable all payments should be done through the WPS system.
- 2.7 Where wages are being paid in cash, this should only be done through the finance department of the business unit with proper documentation signed by each party.
- 2.8 Finance department must ensure that they have the cash paid wages document filed for the purpose of Audit.

3. Payment of Variable Wages

3.1 Overtime

- Variable wages such as overtime should be calculated based upon the local labor laws. Overtime should either be tracked in HRIS system or manual sheets verified and signed monthly by Department Head, Human Resources and the Finance Team.
- Where possible the payment of overtime should be done monthly during the processing of payroll.
- In Business Units where there are limited overtime opportunities are available the payments can be made outside the payroll cycle.
- Certain Business units may also opt for payment of overtime by giving time in lieu for the extra hours worked, the conversation of these extra hours into lieu time should be calculated based upon the local labor laws.
- Business units must also bank hours during leaner periods which can then be utilized as extra hours during peak periods.

3.2 Incentive Payments

- Incentive calculation payments may vary from one unit to another based upon the KPI's linked to the eligibility.
- Clear guidelines should be agreed and documented for the calculation of any incentive payments.
- Business units must ensure that they have appropriate incentive policies in place which should also be reviewed and approved by SDMCC.
- Payments of incentives should also be done with the payroll on the frequency agreed upon (e.g monthly, quarterly or yearly)
- For clarity, incentives may be defined but not limited to:
 - Sales Incentive
 - Upselling Incentive

- Tips
- Commissions
- Any other variable incentive defined at business unit level

3.3 Service Charge (Where applicable)

- Where service charge is applicable, the business units must have a clearly defined service charge policy outlining the eligibility and percentage of distribution.
- Service charge for previous months is paid in the following month.
- The payment of Service Charge should also be done in the monthly payroll.
- Human Resources must post the service charge figures on the notice board for transparency and motivation of the staff members.

3.4 When kept under the safe keeping of Human Resources the employee still has access to their documents at any given moment. While releasing the document back to the colleague HR must ensure that they a release form signed.

3.5 Where these documents are required by the HR for the purpose of administrative purposes such as renewal of visa or any other government procedure, the colleague must promptly submit the originals (where required) to the HR.

3.6 The colleagues must ensure that they submit a copy of any of their renewed documents to the human resources department for the purpose of filing and tracking expiry where necessary.

4. Payment of End of Service Wages

4.1 End of service wages would refer to the final dues paid to any colleague in the event of:

- Resignation
- Termination
- Redundancy
- Inter-property Transfer
- Retirement
- Disability
- Death

4.2 End of service payment should be calculated based upon the provisions of the local labor laws.

4.3 Finance and HR teams must ensure that the colleague has access to review the calculation of their end of service payment and any doubts clarified before the payment is disbursed.

4.4 The payment of end of service should be done directly into the bank account of the colleague and should have a footnote denoting the payment type.

4.5 End of service payment may also be done in form of cheque payment, where bank account may not be available.

- 4.6 Where a colleague has been issued a letter from the business towards a financial institution for the purpose of loans or any other financial assistance, the final dues must be transferred to the said account unless an NOC has been obtained from the institution.
- 4.7 No final dues can be released to any colleague without appropriate signed clearances and return of all company property and cancellation of work permits.
- 4.8 The Business unit may hold in part or full final settlement dues unless such clearances are obtained.
- 4.9 The business unit may also deduct an amount from the final dues for non-return, lost or damaged company property. While making such deductions the depreciation value should be taken into consideration.
- 4.10 Once the final settlement is released the departing colleague must sign on receiving them and that there are no more dues owed to him from the Business Unit.
- 4.11 Any disputes arising for the calculation and payment of the final settlement should be resolved in line with the local labor legislation or by referring such to labor redressal forums.
- 4.12 Where disputes arise the decision of the competent government authorities/labor courts would be the final and would supersede any agreements between the colleague and the Business Unit.

5. Wage Determination

- 5.1 All business units must ensure that the wages paid to their staff are in line with the wage structure in the country/region of operation and in line with the competition.
- 5.2 For above the business units, may participate in annual wage surveys carried out by third party vendors.
- 5.3 Business units can also conduct a wage survey with competition, however, should be mindful of data protection when sharing sensitive information, for this purpose a salary range should be shared.
- 5.4 Any such survey should be carried out by prior consent of SDMCC and format should be shared.
- 5.5 SDMCC may also conduct a regionwide wage survey by engaging third party vendors, under such condition the cost of the survey would be split across business units to which the survey applies.

6. Wage protection for outsourced and Contracted Employees.

- 6.1 All business units must ensure that the rights of wage protection for outsourced and contracted employees are protected.

- 6.2 While contracting third party vendors, it must be ensured that they are aware of the company's code of conduct and wage protection policy.
- 6.3 All third-party contracts should include wage protection clauses and where possible for the hotel to audit the payment of wages on an adhoc basis.
- 6.4 Local business unit Human Resources must at all time maintain close contact with the outsourced labour workforce to check if they are being paid on time and in line with their employment agreements.
- 6.5 Where anomalies are found these should be reported immediately to the business unit's management team and to the property General Manager.
- 6.6 Any violations should be documented and reported to the hotel management team, who in-turn should notify the SDMCC offices.
- 6.7 Any contractor found in violation should be immediately served a termination notice and where possible reported to relevant authorities.
- 6.8 Violating service providers should also be blacklisted for future use.

Conclusion Notes:

- This policy has been drafted to outline the equality and protection of wages of DH employees as well as contracted employees in the region in line with DH-COC and SHA.
- Where there are any deviations to this policy, it should be informed to the SDMCC regional offices.
- Where a local business unit sees the need to implement additional clauses, they are encouraged to do so by informing SDMCC regional offices.
- Any clarity our doubts regarding this policy should be directed to SDMCC offices via written communication.

Approval Matrix	
Approved By	Siegfried Nierhaus
Designation	Vice President SDMCC
Signatures	

Colleague Health and Safety Policy	
Applicable to	All Hotels under Steigenberger DMCC
Policy Owner	Vice President Steigenberger DMCC Regional Human Resources - Steigenberger DMCC Hotel General Managers Hotel Human Resources
Effective Date	01-February-2021
Related Documents	Deutsche Hospitality Code of Conduct
Definitions and Abbreviations	SDMCC – Steigenberger DMCC Business Unit – Any Hotel/entity under the umbrella of Steigenberger DMCC HSE – Health Safety and Environment - methodology that studies and implements the practical aspects of protecting the environment and maintaining health and safety at occupation. In simple terms it is what organizations must do to make sure that their activities do not cause harm to anyone. FLS – Fire and Life Safety Summer Months – For the purpose of this policy, summer months are defined as June – September

Scope:

The purpose of this policy is to ensure that the wages of all employees of DH in the region (regular and contracted) are provided safe working environment with health and safety being the utmost priority.

1. HSE and FLS:

- 1.1 All business units must ensure that they have appropriate HSE and FLS policies in place, these policies should be in line with the DH corporate standards as in line with the standards and specification of the country of operation.
- 1.2 Business units must ensure that HSE and FLS policies are a part of new hire orientation to ensure that all colleagues are aware of their safety and potential risks.
- 1.3 Regular HSE and FLS audits should be conducted at hotel level by competent personnel (Engineering and Security departments)
- 1.4 All Business Units must ensure that they conduct a mock fire drill at least once every quarter and a report of this should be maintained on file for the purpose of audit.

- 1.5 The Audit report should be shared with the Hotel General Manager and SDMCC. Any shortcoming of the Audit should be flagged, and immediate corrective measures should be put in place.
- 1.6 Potential safety risks which do not have immediate solution, should be immediately flagged to SDMCC to take this up with the Owning Company.

2. Uniforms

- 2.1 All business units must ensure that employees are provided with appropriate uniforms, which should be cleaned and laundered by the hotel.
- 2.2 Uniforms must be comfortable allowing the colleagues to carry out their duties with ease.
- 2.3 Shoes are a part of the uniform. For departments such as Engineering and Culinary, appropriate safety shoes should be provided.
- 2.4 Where colleagues are required to work in certain hazardous areas at certain times, it must be ensured that they are provided with Hazard suits to perform their jobs.
- 2.5 All protective gear provided to colleagues to perform their duties should be in line with international and local standards.

3. Working Outdoors

- 3.1 Colleagues working in harsh summer weather conditions especially summer months, should be provided with appropriate uniforms for their comfort.
- 3.2 It must be ensured that these colleagues are always hydrated, for the purpose of this the HR and the Department Heads must ensure that ample amount of Hydration fluids are available to these colleagues in proximity.
- 3.3 Colleagues should be provided with periodic small breaks to allow them to hydrate themselves. These breaks should be in line with the local legislation.
- 3.4 In countries where local legislation doesn't define hydration break periods during summer months, colleagues should be provided hydration breaks at least every 2 Hours.
- 3.5 Business units may at their discretion, change the frequency of such breaks, however they should not exceed the minimum norm as mentioned in point 3.4.
- 3.6 HR representative must ensure that they carry out regular audits of outdoor areas to ensure that colleagues have access to hydration fluids and are being given appropriate breaks.
- 3.7 Hotels may also provide a heat allowance to colleagues working during the harsh summer months. This allowance is limited to the summer months and should be paid along with the monthly wages.

4. Workforce Safety During Pandemic

- 4.1 In the event of any pandemic, business units must ensure that safety of their colleagues.
- 4.2 Appropriate isolation and medical aid should be made available to all colleagues including contracted employees.
- 4.3 Business units must ensure that they adhere to all guidelines provided by the government and any guidelines that may be provided by the DH corporate offices.
- 4.4 Proper sanitization should be carried out throughout the hotel premises as well as the staff housing facilities.
- 4.5 Cleanliness, Sanitization and Temperature logs should be maintained at the hotel as well as the staff housing facilities.
- 4.6 Colleagues must be equipped with proper PPE (Personal Protection Equipment) kits while dealing with the guests.
- 4.7 Colleagues assigned to BOH areas must also ensure that they are following the guidelines provided by the local authorities.
- 4.8 Any colleague showing symptoms should be immediately sent to a testing facility and isolated.
- 4.9 Business units must ensure that a weekly report of all colleague and guest infections are shared with SDMCC regional offices, who in turn would keep the corporate offices in Germany informed.

Conclusion Notes:

- This policy has been drafted to outline the safety and wellness of all colleagues working in all Business units.
- Where there are any deviations to this policy, it should be informed to the SDMCC regional offices.
- Where a local business unit sees the need to implement additional clauses, they are encouraged to do so by informing SDMCC regional offices.
- Any clarity or doubts regarding this policy should be directed to SDMCC offices via written communication.

Approval Matrix	
Approved By	Siegfried Nierhaus
Designation	Vice President SDMCC

Signatures	
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Colleague Housing Policy	
Applicable to	All Hotels under Steigenberger DMCC
Policy Owner	Vice President Steigenberger DMCC Regional Human Resources - Steigenberger DMCC Hotel General Managers Hotel Human Resources
Effective Date	01-February-2021
Related Documents	Deutsche Hospitality Code of Conduct
Definitions and Abbreviations	SDMCC – Steigenberger DMCC Business Unit – Any Hotel/entity under the umbrella of Steigenberger DMCC Live-in – Colleagues staying in a hotel provided accommodation. Live-out – Colleagues who do not live in the company provided housing but opt for a housing allowance.

Scope:

The purpose of this policy is to ensure that all eligible employees of DH in the region are provided with safe and comfortable housing facilities. It is also the endeavor of DH to ensure that all outsourced and contracted employees are being facilitated in safe housing facilities as well.

1. Housing:

- 1.1 All business units must ensure that all Live-in status colleagues are provided with safe and comfortable housing in line with their grades and benefits.
- 1.2 Local laws and legislations must also be taken into consideration when providing housing facilities to the colleagues.
- 1.3 Where possible the housing facility should be sourced within a reasonable distance from the hotel for the ease of commute for the colleagues.
- 1.4 Where accommodation housing more than one colleague per room, it should be ensured that there is ample living space available for their comfort and safety.
- 1.5 The business unit would also be responsible to cover the cost of utilities for the housing facility.
- 1.6 Housing provided to the colleague's should be appropriately furnished with provision of white goods as well.
- 1.7 Where a facility of staff dining is not possible at the accommodation, the units should be provided with cooking facilities.

- 1.8 Where the provision of point 1.6 is not possible, a common kitchen room should be provided with of appropriate cooking ranges.
- 1.9 Colleagues living in the hotel provided accommodation would not be eligible for a housing allowance unless they put in a written application for the same. When doing so their name shall be placed in a waiting list.
- 1.10 Housing allowance may only be provided in case the hotel accommodation facility is full. Priority of the housing allowance will be given in line with the waiting list maintained at the Human Resources Department.
- 1.11 Similar waitlist is also maintained for colleagues who wish to move into hotel provided housing facility. Their live out allowance would cease effective the date that they move in.
- 1.12 Payment of housing allowance will only become applicable upon satisfactory inspection of the premises by the Human Resources representative and handling over of the keys.

2. Facilities

- 2.1 When considering a colleague housing facility below should be taken into consideration:
 - Recreation Room
 - Isolation Room
 - Dining Room
 - Common Kitchen (where cookers are not provided in individual units)
 - Internet/WiFi Facilities in common areas
 - Accommodation office
 - Nurse Room
- 2.2 Colleague housing facility should be manned 24 hours by security with regular patrols
- 2.3 Clean drinking water facilities be provided at the colleague housing.
- 2.4 Transport facilities should be provided from the housing to the hotel and back at regular intervals in line with the shift patterns.
- 2.5 Where housing facility is sourced in a area where there is no access to supermarkets or shopping facilities, minimum 1 trip should be organized on a daily basis.

3. Health and Safety

- 3.1 All housing facilities should be always HSE and FLS complaint in line with the local legislations and DH corporate directives.
- 3.2 Housing facility should have regular cleaning and sanitization schedules in place.
- 3.3 Monthly housing inspections should be carried out by the accommodation team or the human resources representative and a report should be filed for audit purposes.
- 3.4 Hotel engineering and security teams should also conduct regular HSE and FLS Audits at the

housing facility.

- 3.5 Hotel General Manager and Management should conduct monthly surprise visits to the housing facility to ensure compliance of all health and safety aspects.
- 3.6 At least one mock fire drill should be conducted at the housing facility at least once every six months.

4. Business partners/Service providers:

- 4.1 Business units must ensure that all outsourced colleagues contracted with the hotels are being provided with safe and comfortable housing facilities.
- 4.2 HR must ensure that they conduct a site visit of these facilities to check for compliance to standards.
- 4.3 Service providers must ensure that there are proper safety and sanitization processes in place in their living premises.
- 4.4 All third-party contracts should be drawn in line with the Deutsche Hospitality's code of conduct and this policy and be incorporated in the formal contract.
- 4.5 Local business unit Human Resources must at all time maintain close contact with the outsourced labor workforce to check on their wellness and rights adherences.
- 4.6 Where anomalies are found these should be reported immediately to the business unit's management team and to the property General Manager.
- 4.7 Where possible the business units must ensure that site inspections are done before engaging with any contractor to ensure adherence to human rights practices.
- 4.8 Any violations should be documented and reported to the hotel management team, who in-turn should notify the SDMCC offices.
- 4.9 Any contractor found in violation of workforce rights should be immediately served a termination notice and where possible reported to relevant authorities.

Conclusion Notes:

- This policy has been drafted to outline the housing facilities for DH colleagues.
- Where there are any deviations to this policy, it should be informed to the SDMCC regional offices.

- Where a local business unit sees the need to implement additional clauses, they are encouraged to do so by informing SDMCC regional offices.
- Any clarity our doubts regarding this policy should be directed to SDMCC offices via written communication.

Approval Matrix	
Approved By	Siegfried Nierhaus
Designation	Vice President SDMCC
Signatures	

Document Access and Mobility Policy	
Applicable to	All Hotels under Steigenberger DMCC
Policy Owner	Vice President Steigenberger DMCC Regional Human Resources - Steigenberger DMCC Hotel General Managers Hotel Human Resources
Effective Date	01-February-2021
Related Documents	Deutsche Hospitality Code of Conduct Passport Requisition Form Colleague Employment Contract Exit Interview form
Definitions and Abbreviations	SDMCC – Steigenberger DMCC Business Unit – Any Hotel/entity under the umbrella of Steigenberger DMCC

Scope:

The purpose of this policy is to ensure that employees of all business units have free access to their documents and have rights to mobility in changing jobs based upon the legal framework of the country that they are employed in.

Deutsche Hospitality also endeavors that similar circumstances are available to the subcontracted employees and the employees working for the business units through third party vendors.

1. Document Access:

1.1 All business units must ensure that colleague's always have free access to all their documents.

1.2 No business unit under the umbrella of SDMCC should hold on any personal documents of the employees which include but are not limited to:

- Passport
- Government Identity Cards
- Medical Insurance Cards
- Original Certificates
- Hotel Identity Cards
- Driving Licence
- Any other personal document

1.3 Where required a copy of these documents can be kept in personnel file for reference.

- 1.4 The employee may ask the business unit Human Resources to store their passport for safe keeping. Under such circumstance an employee must give a written consent to this.
- 1.5 Human Resource department must ensure that such documents are kept in fireproof safe and should have CCTV coverage of such area.
- 1.6 When kept under the safe keeping of Human Resources the employee still has access to their documents at any given moment. While releasing the document back to the colleague HR must ensure that they a release form signed.
- 1.7 Where these documents are required by the HR for the purpose of administrative purposes such as renewal of visa or any other government procedure, the colleague must promptly submit the originals (where required) to the HR.
- 1.8 The colleagues must ensure that they submit a copy of any of their renewed documents to the human resources department for the purpose of filing and tracking expiry where necessary.

2. Colleague Mobility

- 2.1 All business units must ensure that any colleague has a free will to change employment without any pressure or hindrance.
- 2.2 In line with the above the colleague must ensure that his/her exit from the business unit is in line with their employment contract and the applicable labour laws.
- 2.3 When a colleague wishes to leave/resign from the business unit, this should be accommodated in a friendly and professional manner in line with the local laws and legislations.
- 2.4 Human Resource department must strive to find out the reason for leaving and where possible look at measures if the colleague can be retained.
- 2.5 Where retention is not possible, the human resource department should facilitate the exit clearance and prepare necessary documentation. Human Resource department must ensure that all exit formalities are done in line with the applicable local laws.
- 2.6 A formal exit interview should be conducted with the colleague to get feedback for their tenure in the company. This should be documented and kept in the personnel file.

3. Business partners/Service providers:

- 3.1 SDMCC expects all business units to carry out thorough due diligence while contracting any third parties for the supply of workforce with regards to workforce access to their documents and mobility.
- 3.2 Business units must always ensure that rights of any outsourced labour force employed by them are protected.

Colleague Document Access and Mobility policy

- 3.3 While contracting third party vendors, it must be ensured that they are aware of the company's code of conduct and ethics policy.
- 3.4 All third-party contracts should be drawn in line with the Deutsche Hospitality's code of conduct and relevant sections from this code must be incorporated in the formal contract.
- 3.5 Local business unit Human Resources must at all time maintain close contact with the outsourced labour workforce to check on their wellness and rights adherences.
- 3.6 Where anomalies are found these should be reported immediately to the business unit's management team and to the property General Manager.
- 3.7 Where possible the business units must ensure that site inspections are done before engaging with any contractor to ensure adherence to human rights practices.
- 3.8 Any violations should be documented and reported to the hotel management team, who in-turn should notify the SDMCC offices.
- 3.9 Any contractor found in violation of workforce rights should be immediately served a termination notice and where possible reported to relevant authorities.

Conclusion Notes:

- This policy has been drafted to outline the document access and mobility of DH employees as well as contracted employees in the region in line with DH-COC and SHA.
- Where there are any deviations to this policy, it should be informed to the SDMCC regional offices.
- Where a local business unit sees the need to implement additional clauses, they are encouraged to do so by informing SDMCC regional offices.
- Any clarity our doubts regarding this policy should be directed to SDMCC offices via written communication.

Approval Matrix	
Approved By	Siegfried Nierhaus
Designation	Vice President SDMCC
Signatures	

