

Hilton's Response to the 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).

Count	Brand	Hotel Name	City	Country	Business Model
1	DoubleTree	DoubleTree by Hilton Doha - Al Sadd	Doha	Qatar	Managed
2	DoubleTree	DoubleTree by Hilton Doha - Old Town	Doha	Qatar	Managed
3	Hilton	Hilton Doha	Doha	Qatar	Managed
4	Hilton	Hilton Doha The Pearl Residences	Doha	Qatar	Managed
5	Curio	Aleph Doha Residences, Curio Collection by Hilton	Doha	Qatar	Managed
6	Curio	AlRayyan Hotel Doha, Curio Collection by Hilton	Doha	Qatar	Managed
7	Hilton	Hilton Salwa Beach Resort	Abu Samra	Qatar	Managed

Workforce data

2. Please complete the table below with workforce data. If the exact breakdown is not available, please provide % estimate of workers employed directly and those subcontracted.

Employment type	Total number of people	Male	Female	Main nationalities / countries of origin
Directly employed	0	0	0	Note: Team members are employees of the property owners. All visas and labor contracts are under the sponsorship of the owning company.
Employed by property owner	1733	1170	563	India, Sri Lanka, Philippines, Tunisia, Morocco, Kenya, Kyrgyzstan, Moldova, Spain, Nepal, Pakistan, Tanzania, Myanmar, South Africa Zimbabwe, France, Indonesia, Malaysia
Employed by subcontractors (e.g. service providers or labour suppliers)	442	406	36	Various nationalities listed above
Employed by subcontractors of the property owner (e.g. service providers or labour suppliers)	32	32	0	Various nationalities listed above

3. Please complete the table below with labour supply data. If the exact breakdown is not available, please provide % estimate of workers provided by each company.

Vendor *	Count of Employees
<i>Housekeeping/Stewarding</i>	242
<i>Security/ Lifeguard</i>	153
<i>Engineering Electrical Plumbing</i>	12
<i>Transportation</i>	9
<i>Valley Services</i>	9
<i>Kitchen/Stewarding</i>	8
<i>Drivers/ Valet parking</i>	7
<i>Medical Personnel</i>	4
<i>Pest Control</i>	2
<i>Recreation</i>	1

*Hilton is unable to disclose entity names due to language present in vendor contracts.

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.

Yes, Hilton has publicly available policies that reflect our commitment to respect human rights in our operations and throughout our business relationships. These policies specifically address workers' rights and reference relevant human rights standards.

At Hilton, we have a shared purpose to be the most hospitable company in the world by positively impacting our guests, team members, hotel owners and communities. As a business of people serving people, respecting human rights is a core part of our mission. Hilton is committed to implementing human rights due diligence across our global operations, working with suppliers to eradicate any form of forced labor and human trafficking, and creating and partnering with cross-industry networks to advance international human rights as part of our 2030 Travel with Purpose Goals.

Our commitment to respecting human rights is enshrined in our Code of Conduct, Human Rights Principles, and Responsible Sourcing Policy, including the prohibition of forced labor, bonded labor, child labor, slave labor, human trafficking and recruitment fees, and the prohibition for any Hilton property, product, or service being used in any manner that supports or enables any form of abuse and exploitation. Hilton is a proud signatory of the United Nations Global Compact, and our human rights strategy is informed by the United Nations Guiding Principles for Business and Human Rights (UNGPs).

Policies: [Code of Conduct](#)
[Human Rights Principles](#)
[Responsible Sourcing Policy](#)

5. Does your company have a human rights due diligence process for identifying and prioritizing 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.

Yes, Hilton has a due diligence process that includes identifying and prioritizing workforce risks in our operations and throughout our business relationships, including in Qatar.

Hilton is committed to embedding human rights due diligence across our global operations. We embed human rights in Hilton policies and governance (as explained in previous sections), provide modern slavery training to our team members in key roles across the region and map 100% of operating hotels against human rights risks (including modern slavery specific risks).

We continually assess human rights risks across our business activities, including managed and franchised hotels, corporate offices, and business relationships. In 2019, we conducted an in-depth risk analysis for migration corridors from South Asia to Qatar, which helped identify industry risks around recruitment fees. The analysis included in-person visits and interviews with operating hotels in Qatar, recruitment agencies and candidates. This resulted in a new preferential list of labor suppliers being identified, which is reviewed on an annual basis.

In 2020, Hilton supported the ILO's efforts to create a fair recruitment toolkit for Qatar through the Working Group for Sustainable Growth and Decent Work in Qatar's Hospitality Sector. We also reviewed our due diligence process based on the Working Group's recommendations. We continue to collaborate and learn from non-governmental organizations working to improve recruiting practices in Qatar.

ILO's Guidance Tool: [Promoting fair recruitment and employment: A guidance tool for hotels in Qatar](#)

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?

Yes, Hilton's processes around selection of business partners, both hotel owners and suppliers, includes consideration of treatment of migrant workers. During our initial engagements with prospective owners and suppliers, they are provided with our Code of Conduct and Human Rights Policy (as well as our Responsible Sourcing Policy in the case of suppliers), required to make representations regarding their reputational and legal history related to human rights, and obligated to provide sufficient information to allow for vetting. Our vetting process consists of due diligence conducted with the assistance of third-party experts, including consideration of human rights and modern slavery issues such as recruitment fees, wages, working/living conditions and health and safety. The nature and scope of such due diligence is adjusted depending on the particular risks of the jurisdictions at issue (for migrant workers both the sending and receiving countries are considered) and other key factors.

Cost considerations are not a factor in the application of our due diligence process. In fact, in order to fully remove such considerations from business decisions, due diligence is run by the Legal Compliance Team via a protected budget to ensure that business teams have no incentive or ability to influence due diligence risk assessments.

Our internal statistics show that approximately 1% of third-parties were rejected due to risks identified via our due diligence process. But this percentage does not accurately reflect the volume of business relationships rejected due to risks because it does not include data around third-parties rejected prior to formal due diligence. Our internal training modules provide Development, Procurement, HR, and Operations team members with tools to assess risks in the human rights and modern slavery areas, and encourage these team members to avoid potential business relationships when they spot such risks. We know from anecdotal data that many third-parties who may be interested in a business relationship with Hilton are never even considered due to early identification of risks prior to any formal due diligence.

Our team members also understand that the value of the risk assessment tools developed through our training modules and their obligation to use these tools continue during the life of approved business relationships. Team members continually monitor Hilton's relationships to ensure that business partners are acting in a manner consistent with Hilton's policies.

Policies: [Code of Conduct](#)
[Human Rights Principles](#)
[Responsible Sourcing Policy](#)

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?

Yes, Hilton requires hotel property owners and subcontractors in Qatar to comply with our human rights and other rights-related policies and procedures. Hotel owners and vendors acknowledge the

human rights policy when completing the due diligence questionnaire and contracts with subcontractors include our Responsible Sourcing Policy. Third parties approved for compliance due diligence are continually monitored by the Legal Compliance Team to ensure that business partners are acting in a manner consistent with Hilton's policies. Any violations would be investigated and may lead to disciplinary action, including termination of the relationship for repeated violations or noncompliance.

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.

Yes, Hilton has a publicly available policy which states that no worker in its operations or supply chains should pay for a job and that the costs of recruitment should be borne by the employer.

As stated in our Responsible Sourcing Policy, Hilton reserves the right to review recruitment agencies' practices through third-party audits. If Hilton were to discover any issues, Hilton would investigate the matter and would not continue to use recruitment agencies that fail to comply with our policies.

Also, Hilton is a member of the Sustainable Hospitality Alliance and is committed to the Forced Labor Principles: every worker should have freedom of movement; no worker should pay for a job and no worker should be indebted or coerced to work. Hilton's external corporate responsibility report details this commitment. Our Human Rights Principles and Responsible Sourcing Policy include our opposition to any forms of modern slavery and forced labor.

Sustainable Hospitality Alliance's principles: <https://sustainablehospitalityalliance.org/our-work/human-rights/principles-on-forced-labour/>

9. Please describe the due diligence process you undertake to ensure that your recruitment standards are applied. In your answer please address specifically:

The due diligence processes described above in question 6 applies equally to recruitment agencies. Recruitment agencies are required to implement the standards described in Hilton's Responsible Sourcing Policy (as incorporated into all contracts) and to monitor against those standards during the life of our business relationship. No recruitment agency can be approved for a business relationship with Hilton absent these steps and considerations.

- a) Whether you carry out due diligence on recruitment agents in sending countries? Yes/No. If yes, provide details.

Yes, we conduct due diligence on recruitment agencies. Details on the due diligence process can be found in question 6.

- 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.

Yes, we interview all candidates who are hired for positions to ensure that no recruitment agencies required them to pay any fees to obtain the position for which they were hired. We ask these employees the same question during their onboarding process and again during their employment.

- c) If you have a process for preventing contract substitution? Yes/No. If yes, please describe.

Yes, we have a process for preventing contract substitution. We issue contracts directly to the selected candidates and only accept contracts signed by those candidates.

- d) Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process.

Yes, we monitor the compliance of business partners. We continue to follow up and interview team members at different times to ensure business partners are following ethical recruitment practices.

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?

Through its due diligence processes for Qatar described in the answer provided to question 5, Hilton uncovered instances of recruitment fees paid by workers in Qatar in 2019 and 2020.

Hilton immediately began addressing this issue with all impacted team members and recruitment agencies. We conducted a thorough investigation; the labor supplier failed to remediate the problem; and we terminated the relationship with the labor supplier. We will not continue to use labor agencies that fail to comply.

2019 Fact Sheet: [Human Rights Fact Sheet](#) (excerpt from Corporate Responsibility Report)

Policies: [Responsible Sourcing Policy](#)

[Human Rights Principles](#)

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.

We determine team members' wages in Qatar by benchmarking our salaries against relevant jobs in the industry. There is a salary scale and benefits plan for all hotel positions that applies to all hires. We do not discriminate based on any personal characteristics, including race, gender, religion, and nationality.

Salary payments are also monitored through the WPS – Wage Protection System – managed by the Qatar Ministry of Administrative Development, Labour and Social Affairs (MADLSA).

As stated in our Responsible Sourcing Policy, Hilton reserves the right to review labor agencies' practices through third-party audits that cover all aspects of worker welfare, from recruitment to employment conditions, including salary payment. If Hilton were to discover any issues, Hilton would investigate the matter and require the labor agency to immediately and fully pay the employee an appropriate salary. We will not continue to use labor agencies that fail to comply.

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)?

Hilton pays team members their salaries on a monthly basis. Overtime compensation is determined by labor laws in Qatar. Illegal deductions are strictly prohibited. Any deduction would follow the labor

laws, would require the written consent of the Team Member, and would be reviewed and approved by Human Resources, Finance, and the General Manager to prevent any illegal deductions.

As stated in our Responsible Sourcing Policy, Hilton reserves the right to review labor agencies' practices through third-party audits that cover all aspects of worker welfare, from recruitment to employment conditions, including salary payment. If Hilton were to discover any issues, Hilton would investigate the matter and require the labor agency to immediately and fully refund the improper deductions. We will not continue to use labor agencies that fail to implement such steps and are removed from the preferred supplier list.

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.

This year, our industry faced unprecedented challenges as a result of the COVID-19 pandemic and our company's resilience was tested in ways we never could have predicted. Despite our best efforts, the financial impacts of the pandemic forced us to reduce our global corporate workforce by 30%.

In Qatar, we mitigated the impact of the pandemic through a combination of reducing team members' working hours and relocating team members across properties to avoid having to reduce our workforce. Despite our best efforts, the pandemic had a significant impact on the hospitality industry. While we unfortunately had to terminate the contracts of 7.2% of our pre-pandemic workforce, we remain hopeful that future recovery will bring opportunities to welcome back a significant portion of these employees.

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?

The decision to terminate team members was extremely difficult. We sought to maintain transparency and provide support throughout this process. Redundancies were determined based on business capacity as hotels navigated the impacts of the global COVID-19 pandemic.

Hilton ensured all team members received their wages. In Qatar, all those who preferred to leave the country were repatriated and those who preferred to stay in Qatar were provided with accommodation and non-objection letters until their sponsorship was transferred.

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?

We prioritized supporting all our employees during this difficult year, including those who were personally impacted by COVID-19, part of a workforce reduction, or who continued working through the crisis. In Qatar, compensation packages were in line with local labor laws and individual contracts. Hilton also provided meals and accommodation to those waiting to return home or change sponsorship.

For all team members globally, Hilton also provided access to online training materials and activated the Team Member Assistance Fund to financially support team members and their families that were directly impacted by the virus.

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?

To ensure that employees have free and secure access to their passports and identity documents, Hilton does not collect or retain team members' passports or other identity documents.

As stated in our Responsible Sourcing Policy, Hilton reserves the right to review labor agencies' practices through third-party audits that cover all aspects of worker welfare, from recruitment to employment conditions, including no retention of identity documents. If Hilton were to discover any issues, Hilton would investigate the matter and require the labor agency to immediately return any identity documents. We would not continue to use labor agencies that fail to implement such steps.

Policies: [Responsible Sourcing Policy](#)

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:

- a. Are there any restrictions based on type or length of contract?
- b. 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?
- c. Do workers have to comply with any additional administrative requirements applied by the employer to change jobs?

Before Law No. 17 of 2020 was passed, we would grant No Objection Certificates (NOCs) to any employee who wished to change jobs, regardless of his/her length of service. Subsequent to the passage of Law No. 17 of 2020 and the elimination of the No Objection Certificate requirement, we only require team members to follow the notice period established by the Ministry of Administrative Development, Labour, and Social Affairs (MADLSA) for transfer requests. Since the implementation of this process, all 57 team members who asked to transfer have used the new MADLSA sponsorship transfer process.

Hilton does not have any control over the employment terms of subcontracted employees. As stated in our Responsible Sourcing Policy, Hilton reserves the right to review labor agencies' practices through third-party audits that cover all aspects of worker welfare, from recruitment to employment conditions. If Hilton were to discover any issues, Hilton would investigate the matter and require the labor agency to remediate those issues. We would not continue to use labor agencies that fail to implement such steps.

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?

Hilton does not restrict movement or enforce a curfew for any gender in provided accommodation in Qatar.

Hilton is committed to improving best practices across the hospitality industry and participates in the ILO Working Group for Sustainable Growth and Decent Work in Qatar's Hospitality Sector to address various issues, including restrictions on movement.

[ILO working group link](#)

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.

The health and safety of our employees are of paramount importance, as defined in our Code of Conduct, Human Rights Policy, and our internal Workplace Health and Safety Policies, and Recruitment Policies. All employees are provided training on workplace health and safety policies and protocols. Hilton hotels in Qatar have adopted the best practice of limiting the time individuals spend working under the sun during summer and encourage wearing heat protection tools. The Workplace Health and Safety Policies and information are always available in the employee's handbook and communication boards.

Hilton does not have any control over the employment terms of subcontracted employees. As stated in our Responsible Sourcing Policy, Hilton reserves the right to review labor agencies' practices through third-party audits that cover all aspects of worker welfare, from recruitment to employment conditions. If Hilton were to discover any issues, Hilton would investigate the matter and require the labor agency to immediately remediate those issues. We will not continue to use labor agencies that fail to implement such steps.

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.

Since the beginning of the COVID-19 pandemic, Hilton has continuously monitored the situation to support the health and safety of our guests and team members. As part of our global response to the pandemic, we created our Hilton CleanStay health and safety program, in collaboration with Lysol and Dettol maker RB and Mayo Clinic. Among a number of safety precautions, this program ensures regular sanitization of high touch points, creates clear social distancing guidelines and signage, limits the number of meetings and attendance as per government guidelines, and updated housekeeping standards in an effort to protect both our guests' and team members' health. In addition to these measures, training was also designed to ensure all team members were aware of the steps they can take to keep themselves and others healthy while at work. Policies and procedures are updated on a regular basis to reflect the state of the business and to ensure the most relevant, critical resources are available to team members on the Hilton intranet.

[Hilton CleanStay](#)

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?

Hilton's standards for accommodations for team members are in line with international best practice and are managed by Hilton's Human Resources department.

Hilton is committed to improving best practices across the hospitality industry and participates through the ILO's Working Group for Sustainable Growth and Decent Work in Qatar's Hospitality Sector to address various issues, including accommodations.

As stated in our Responsible Sourcing Policy, Hilton reserves the right to review labor agencies' practices through third-party audits that cover all aspects of worker welfare, from recruitment to employment conditions, including workers' living conditions. If Hilton were to discover any issues,

Hilton would investigate the matter and require the labor agency to remediate those issues immediately. We would not continue to use labor agencies that fail to implement such steps.

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.

In response to the COVID-19 pandemic, we acted quickly to ensure the safety and wellbeing of our team members around the world. In addition to instituting our Hilton CleanStay program described above, we encouraged team members who had the ability to work from home to do so and trained those who needed to physically report to work on steps they could take to keep themselves and others healthy while at work. With regards to accommodations, the company offered dedicated isolation apartments available to all team members requiring to quarantine for COVID.

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

23. Does your company have the following policies:
- d. 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.
 - e. 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.

Yes, Hilton has policies and trainings related to both of these critical topics.

At Hilton we do not tolerate any form of harassment or discrimination based on any personal characteristic, including race, color, gender, religion, or nationality, as outlined in our Code of Conduct and our Human Rights Principles. Hilton strives to create an environment free of harassment and offensive conduct. Employees are trained on inappropriate workplace conduct, including how to handle and respond to such conduct, whether initiated by a co-worker, guests, or others. This training is part of our annual mandatory Code of Conduct training for all corporate and managed workforce members. In addition, Hilton provides an anti-harassment training on its internal learning platform.

Hilton condemns all forms of human trafficking and commercial exploitation, including the sexual exploitation of men, women, or children. As signatories of the ECPAT Tourism Child-Protection Code of Conduct, we are fully committed, in every one of the markets in which we operate, to protecting individuals from all forms of abuse and exploitation. We expect our team members as well as our business partners to help us meet this commitment. We require all employees, including at franchise properties, to take an annual training on identifying the signs of human trafficking and safely reporting them. Figures on training participation are disclosed annually on our corporate responsibility report available from cr.hilton.com.

See: Harassment & Violent Free Workplace policy - <https://cr.hilton.com/wp-content/uploads/2021/04/Hilton-Harassment-and-Violence-Free-Workplace-Policy.pdf>

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)?
 - How are business partners are made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)?
 - Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse?
 - What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?
 - 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?

Hilton maintains the Hilton Hotline, an anonymous reporting mechanism for directly employed and subcontracted workers to report concerns relating to conduct at our corporate offices and leased and managed properties, including concerns relating to abuse. Hilton investigates reports made through the Hotline with confidentiality to the extent possible and has clear written policies prohibiting retaliation. Team members at corporate offices and managed properties are made aware of, and reminded annually of, the Hilton Hotline when they complete the annual mandatory training on Hilton's Code of Conduct. Hotline posters with contact details can be found throughout the communal team member areas in the back of house. The Hilton Hotline is publicly available for anyone to report a concern including partners, suppliers, guests, or community members. All reports are fully investigated, and support is offered to team members when appropriate.

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?

To fully protect the integrity of Hilton's grievance reporting and internal investigations process, including concerns about confidentiality and retaliation, we do not provide specific information about volume of grievances/reports. We do conduct regular internal assessments of our reporting mechanisms to ensure that they are fully-functional and well-publicized. We also recognize that a low volume of reports could be either a positive sign that risks have been proactively addressed or a negative sign that reporting mechanisms are ineffective. To this end, we have conducted an assessment of the effectiveness of our grievance mechanisms in Qatar and confirm that they are fully-functional and information is flowing. We also confirm that grievances raised by Hilton team members or contractors in Qatar during 2019 and 2020 were fully investigated with no grievances substantiated (although lack of substantiation does not preclude Hilton from taking steps to correct misunderstandings/lack of full information or to protect against potential future risks).

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?

All Hilton hotels in Qatar have a culture committee with workforce representatives. These committees empower employees to take actions at a hotel level to address concerns and opportunities on a number of operational and wellbeing matters. These committees meet monthly and are made of representatives from each operational department.

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?

Directly employed and subcontracted workers can raise concerns by making a report through the Hilton Hotline in 17 languages. As detailed in the response to question 24, Hilton investigates reports made through the Hotline with confidentiality to the extent possible and has a written policy against retaliation. Employees at corporate offices and managed properties are made aware of, and reminded annually of, the Hilton Hotline when they complete the annual mandatory training on Hilton's 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?

To fully protect the integrity of Hilton's grievance reporting and internal investigations process, including concerns about confidentiality and retaliation, we do not provide specific information about volume of grievances/reports. We do conduct regular internal assessments of our reporting mechanisms to ensure that they are fully-functional and well-publicized. We also recognize that a low volume of reports could be either a positive sign that risks have been proactively addressed or a negative sign that reporting mechanisms are ineffective. To this end, we have conducted an assessment of the effectiveness of our grievance mechanisms in Qatar and confirm that they are fully-functional and information is flowing. We also confirm that grievances raised by Hilton team members or contractors in Qatar during 2019 and 2020 were fully investigated with no grievances substantiated (although lack of substantiation does not preclude Hilton from taking steps to correct misunderstandings/lack of full information or to protect against potential future risks).

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?

As a business of people serving people, respecting human rights is a core part of our mission. Our human rights strategy is informed by the UN Guiding Principles for Business and Human Rights. Our commitments and expectations are set out in our Code of Conduct, Human Rights Principles, and Responsible Sourcing Policy, including the prohibition of forced labor, bonded labor, child labor, slave labor, human trafficking and recruitment fees, and the prohibition for any Hilton property, product, or service from being used in any manner that supports or enables any form of abuse and exploitation.

Through our industry-leading Travel with Purpose 2030 Goals we are committed to embedding human rights due diligence across our global operations and in our supply chain, and partner with suppliers to address any form of forced labor or trafficking. Our goals also state that we will create and partner with cross-industry networks to advance international human rights. Updates on goal progression can be found in our Corporate Responsibility report, available at cr.hilton.com

As part of our commitment to working across the industry, we co-founded the Sustainable Hospitality Alliance (formerly International Tourism Partnership) and are an active member of their Human Rights working group. Building on the launch of the organization's Human Rights Policy Statement and Human Rights Goals and Forced Labour Principles, we shared our internal training on risks of modern slavery in labor sourcing with the Sustainable Hospitality Alliance and made it available for free to the entire industry. As of March 2021, 70 organizations have already used the training, including hotels, industry associations, airlines, and NGOs.

In 2019 and 2020, Hilton also proactively participated in a series of workshops for the hotel industry in Qatar on organized by the Alliance, the International Labor Organization (ILO), the Qatar Ministry of Administrative Development, Labour and Social Affairs (MADLSA) and the Institute for Human Rights and Business (IHRB), sharing best practices and contributing to the creation of industry-wide tools in the following areas: due diligence of suppliers and recruitment agencies, responsible recruitment practices, methods to provide representation of workers, effective processes for managing employee grievances, and freedom of movement for workers.

In addition to our work with the Alliance, Hilton also worked across the industry to:

- Become a proud signatory of the ECPAT Code to prevent human trafficking in tourism in 2011 and in 2018, we supported the launch of the ECPAT and World Travel and Tourism Council (WTTC) Call for Action for the Protection of Children in Travel and Tourism.
- Co-found the WTTC Anti-Trafficking Task Force in 2019.

- Co-found of the UK Stop Slavery Hotel Industry Network led by Shiva Foundation in November 2016, which brings together hotel brands, operators, and owners. Through this group, we supported the draft and launch of the Framework to Engage with Suppliers, which provides tools to help procurement teams engage with suppliers to address risks of forced labor and modern slavery in the supply chain. We also supported the Network's new Resource Hub. Both resources are a first for the hotel industry.

Unfortunately, our industry faced unprecedented challenges throughout most of 2020. The global health crisis impacted our operations, our communities, our employees, and their families. Staying focused on our core values has never been more critical and the business has rallied around this message. In fact, Hilton conducted a Materiality Assessments towards the end of 2020 and "Ethical Business Practices" came out as imperative to all business operations, followed by Human Rights being confirmed as an important aspect for the company from both internal and external stakeholders. The results of this Materiality Assessment inform Hilton's ESG programs and findings will be published in Hilton's 2020 Corporate Responsibility report.

Despite the significant operational challenges that we have faced in the past year, Hilton continues to engage with international institutions to promote collective action and support the goal of eradicating modern slavery. We are also continuously reviewing our internal processes in alignment with risks, standards, and best practices. Hilton is committed to respecting fundamental human rights for all people, this includes the welfare of our employees and fostering respect for the welfare of workers throughout our value chain. We expect our suppliers and business partners to commit to the same and are ready to take action to ensure our business partners live up to our commitments.