

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

1. 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).

Kempinski currently manages two properties in Qatar: Marsa Malaz Kempinski, The Pearl and Kempinski Residences & Suites, Doha.

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.

Kempinski mainly acts as an Operator of the hotels on behalf of their Owners. Therefore, all employees hired directly in our properties are employed by the owning company and not by Kempinski, though Kempinski policies fully apply to employees hired by the Owners. In this scenario the working relationship is between the Employees and the owning entity.

Hereinafter, they will be referred to as "**Employees**".

Aside from these Employees, properties contract with Workforce suppliers that provide our hotels with staff when / as needed. In this scenario the legal relationship is between the hotel and the supplier company. Kempinski policies, such as the Labour Standards for Third Parties Policy, do apply, and hotels and Residences operated by Kempinski are required to build them into all supplier contracts providing outsourced labour.

Hereinafter, such staff will be referred to as "**Outsourced Staff**".

Considering a constant fluctuation in both numbers of Employees and Outsourced Staff from one day to another, we are operating in Qatar with an approximate ratio of: 72% Employees vs 28% Outsourced Staff.

3. Please complete the table below with labour supply data.

Please be aware that we cannot disclose a full list of suppliers for compliance reasons.

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.

We have 2 policies available on our website:

1. Labour Standards by Third Party Provider Policy - <https://kempinski-dev.s3.amazonaws.com/34394674/policy-regarding-labour-standards-for-third-party-providers-2020-version.pdf>

2. Human Rights Policy - <https://kempinski-dev.s3.amazonaws.com/34396998/human-rights-policy-kempinski.pdf>

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.

Our due diligence process for identifying workforce risks in the workforce is based on our policy, Labour Standards by Third Party Providers. The HR Team along with the General Manager routinely meet with outsource employees and suppliers as well as visit their accommodation and offices to ensure that all aspects of the policy are being followed. Top three risks include:

1. Documented acknowledgement agreements between the supplier and employee to avoid confusion pertaining to working relationships.
2. Employees not being clear on the benefit package that their supplier provides.
3. Employees wanting to transfer to other companies before fulfilling their contractual agreements with their suppliers.

On an ongoing basis, these remedies are addressed by ensuring that the communication between employees and their suppliers are documented and employees are briefed on their benefits and their responsibility to satisfy their employment contract with their suppliers.

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 indeed, Kempinski has implemented a thorough process to ensure that our labour suppliers respect the rights of migrant workers. Within our properties, all Employees and Outsourced Staff, are to be treated equally and fairly, with working conditions in line with local laws and practices.

Our supplier agreements contain a series of provisions to ensure compliance with minimum standards that all subcontractors and labour suppliers are expected to apply. Such provisions include but are not limited to the following:

- Rest Time/Day(s) Off – whereby this is given in accordance with local labour law and suppliers have to guarantee that Outsourced Staff will not be placed on any work assignments with other employers during their rest times off duty with Kempinski.
- Working Hours – whereby Outsourced Staff should not exceed the maximum working hours stated in the labour law and overtime is tracked and compensated as per legal regulations.
- Minimum Wage - whereby Outsourced Staff are paid in line with wage levels prescribed by local labour law.
- Recruitment Fees – whereby such fees cannot be charged to Outsourced Staff by the employer or any other third party and should be absorbed by the employing entity.
- Wage Deductions – whereby any wage deduction from Outsourced Staff must be made within the boundaries of the labour law.
- Living Arrangement – whereby this is provided to the Outsourced Staff, in accordance with the requirements of the local law.
- Insurance – whereby this is provided to all Outsourced Staff in line with the requirements of the local law.
- Rights of free speech – whereby Outsourced Staff are not deprived from speaking up.

Kempinski is requesting all its subcontractors and labour suppliers to acknowledge the Kempinski Code of Conduct & Business Ethics and accept that Outsourced Staff assigned to our premises are asked to adhere to it and be instructed in the use of the Kempinski Whistleblowing Policy in case of any malpractice.

In addition, Kempinski reserves the right to carry out checks whether these clauses are fully respected. We do this through interviews with Outsourced Staff where we ask them questions about their working arrangements/conditions. We also conduct unannounced visits at the accommodation premises to do spot checks.

We terminate the agreements with suppliers who do not comply with the above requirements, as per the two policies referenced in question 4 above.

The Qatari Government Supreme Committee also conducts scheduled audits with outsourced business partners and provides the suppliers with a comprehensive report so they are aware of the areas that must be rectified. In 2020, in partnership with the Supreme Committee, we

terminated a contract with one of the suppliers due to a slow response in rectifying standards at their employee accommodation.

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 – Links as per Question 4 above

The Kempinski Code of Conduct & Business Ethics as well as our Whistleblowing Policy are as well applicable to Outsourced Staff and the Outsource company needs to abide by this. In terms of monitoring mechanisms, our hotels are adhering to a very strict protocol, whereby they conduct regular interviews and catch-up sessions with Outsourced Staff (including temporary ones and randomly selected) using a Survey Form and an Audit Checklist to be used with the supplier companies to check adherence.

Any breach with potential prejudice to the rights of the Outsourced Staff identified is further investigated and a corrective action imposed. Should our suppliers fail to rectify the situation within given timelines (a maximum of 30 days) sanctions are imposed that can include immediate termination of the agreement.

Meetings are held with all suppliers to explain our stance on human rights before contracts are signed so they understand their responsibilities and can ask questions if they are unclear. Ongoing interviews with employees take place which are conducted by the HR Team and the Supreme Committee to assess the suppliers' commitment to compliance our procedures and to address employees' concerns if they have any. During accommodation inspections, photos are taken by both the HR Team and Supreme Committee and any potential risks are flagged and sent to the suppliers for rectification with an agreed upon deadline for completion.

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, this can be found on our career website here: <https://kempinski.jobs/faqs/>

Outsource providers are required to comply with the standards of our "Labour Standards for Third Party Providers Policy", available on our website (link in Q4 above) which states the following: *Recruitment fees cannot be charged to the staff by the employer or any other third party and all recruitment costs should be absorbed by the employing entity.*

To monitor compliance, we also perform spot checks by asking Outsourced Staff upon joining to see if they have been charged any recruitment fees. Providers which are in breach of the Labour Standards are put under warning to remedy the situation and risk a termination of their contract.

For recruitment of Employees:

Our hotels use occasionally headhunters and recruitment agencies to source candidates. As a principle, Kempinski does not contract with agencies that charge recruitment or placement fees from any candidates introduced. The only fees paid to the agent are the contractual fees owed by the employer. This point is included in the contracts between our hotels and the recruitment agencies, as a separate clause, whereby candidates introduced by the recruitment agent are not being charged any fee for the placement services.

Also, we check with our Employees upon their joining whether they have been charged any recruitment fees. Where discrepancies are found, investigations are conducted, and steps are taken to immediately rectify this situation. Kempinski will not hesitate to immediately stop collaborating with agents that charge such fees to candidates.

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. *N/A - we do not use overseas agencies. Based on human rights guidelines imposed by the Supreme Committee, we conduct business with companies located in Qatar who are aware of the State of Qatar's strong commitment to protecting the rights of workers.*
 - 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. *No we do not check prior to their employment however, we check with our Employees upon their joining whether they have been charged any recruitment fees.*
 - C. If you have a process for preventing contract substitution? Yes/No. If yes, please describe. *Yes. During interviews with employees, we ask if they received their contracts to determine if any substitution activity has taken place.*
 - D. Do you monitor the compliance of business partners? Yes/No. If yes, please describe your monitoring process. *Yes, business partners are monitored during ongoing inspections and meetings conducted by the Supreme Committee and the HR Team.*

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?

No cases were identified in 2019 or 2020.

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.

For Employees:

Kempinski operated hotels & residences comply with local labor practices, laws and legislation in all cases. As such, if there is a minimum wage stipulated in the law, this is adhered to – in all markets where we operate. Next to that, we can confirm that our minimum wage is not less than 1400 QR.

We also carry out annual salary benchmarking through an official third party company who specializes in Hospitality salary benchmarking, so our Employees' salaries remain competitive. Salaries are determined by position, level within the organization and experience. Nationality, background, ethnic origin or religion do not play any role in determining the salary levels of our Employees.

For Outsourced staff:

Our Labor Standards for Third Party Providers Policy states "Staff have to be paid at least at minimum wage level prescribed by local labor law".

In Qatar, in order to obtain their Work Permits, Outsourced Staff must have government issued employment contracts which solidifies that they are earning salaries that are aligned with the law.

Moreover, in Qatar all Outsourced Staff are protected under the wage protection system (WPS) and records are reviewed periodically to ensure their rights are not being violated. All contracted workers have government issued employment contracts which further solidifies that they are earning salaries that are aligned with the law.

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)?

For Employees:

Salary is paid on a monthly basis and in full compliance with Kempinski payroll policies and processes. This includes a review of attendance, days off (planned and unplanned), and any overtime. Deductions are not permitted at Kempinski, unless they account for loans advanced to the employees (i.e. Housing Loan, Travel ticket loan) or Salary Advances.

For Outsourced Staff:

All our suppliers are required to comply by the same process, as outlined in our Labor Standards for Third Party Providers Policy which states: *Staff have to be paid at least at minimum wage level*

prescribed by local labor law, and it needs to be paid in a timely manner. Suppliers need to be able to provide evidence in the format of payslips or payroll records that there was no wage paid below the minimum.

Hotel HR also checks regularly with our Outsourced Staff to verify whether they have received their salaries on time, and in full (HR conducts one to one sessions with randomly selected employees,). Should any issue be highlighted, HR will then initiate an audit with the concerned company and take remedial action as necessary which is stated in the Third Party Providers Policy as follows: *Should there be any indications of malpractice by a supplier through routine spot checks or whistleblowing from outsourced staff or external sources, the improvement areas need to be sent to the supplier as a warning and be rectified within a given deadline of maximum 30 days, after which an immediate renegotiation of the contract, and if required change of provider, needs to take place.*

Moreover, in Qatar, all salaries are paid through the wage protection system (WPS) which validates that monthly salaries are paid to employees. As part of the auditing process, we ask from contractors to share their WPS records with us to ensure payments and overtime are being deposited. If there are any delays, we follow up directly with the company and ask for documentation and confirmation from the worker(s) in question to ensure that payments were received.

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.

During the Covid pandemic, we reduced our permanent employee headcount by 10%. We discontinued the use of outsourced business partners due to government restrictions which resulted in the temporary closure of the hotel. We therefore temporarily suspended contracts of the 28% of outsourced workers. These companies are now providing outsource staff on a reduced basis and this is continually monitored according to the changing pandemic situation

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?

All redundancies as a result of Covid hardships were aligned with the Labour Law of Qatar. Employees received their full end of service settlements, were allowed to remain in the housing facility until they found new jobs and meals were provided to them. Employees that decided to return to their home countries, we provided them with return flight tickets which is their entitlement once their job assignment ends.

Employees who were out of the country during the pandemic with no foreseeable timeframe of returning, were made redundant. The names were placed on the Kempinski International Talent Pool list so the heads of Human Resources could contact them for future employment at the other Kempinski hotels worldwide.

The other small percentage of employees who were also made redundant were selected based on the need for the position. These decisions were conducted in collaboration with the Executive Leadership team to ensure that an objective business rationale was debated before making a role redundant.

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?

All redundancies for hotel employees and outsourced business partners were aligned with the Labour Law of Qatar which was closely monitored by the Ministry of Labour and the Supreme Committee. Employees received their full end of service settlements, were allowed to remain in the housing facility until they found new jobs and meals were provided to them. Employees that decided to return to their home countries, were provided with return flight tickets to their countries. The government published informational campaigns for workers to contact them if they had any questions or concerns regarding final settlement payments.

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?

For direct employees, full access to their legal documents is ensured, and the hotel does not safekeep the passports of employees.

For the Outsourced Staff, the hotels' HRs conduct spot checks by questioning them, and should any issue be highlighted the HR will then require an audit with the concerned company. These checks are in line with the above-mentioned Labour Standards for Third Party Providers Policy and enforced by the Supreme Committee during their interviews and inspections.

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?

Kempinski adheres to local labour practices, laws and legislation on such matters and does not prevent any of its Employees from changing jobs or leaving Qatar whenever they want.

For the Outsourced Staff, it is required that contractors fully adhere to the local legal provisions. Any non-compliance identified is immediately investigated and addressed with the concerned company. Failure to have a timely, effective and legal resolution of the concern will lead to an immediate termination of the agreement.

In relation to Outsourced Staff, to note that in Qatar work tenure is based on the government contract and employees must satisfy the contractual terms before being eligible to receive a NOC (No objection certificate) to work for another employer.

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?

There are no curfews in the accommodation. Our Employees are free to leave and enter the company provided accommodation at any time they wish to.

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.

There are various protocols to manage outdoor work during summer months:

- Shift rotation – there is a regular shift rotation to ensure Employees and Outsourced Staff are scheduled at different times and are not subject to working in the same shift for extended periods of time
- Employees working on the outdoors receive a premium heat allowance between the hours of June through September
- Breaks – Employees and Outsourced Staff take frequent breaks, so they are not exposed to the sun or heat for extended periods
- Uniforms – Employees and Outsourced Staff have special uniforms for the summer months that include caps and sunglasses as needed
- Protective equipment – umbrellas, fans and sun protection products
- Refreshments – Employees and Outsourced Staff working outdoors are provided with regular refreshments such as energy drinks and water, cool towels etc.

- Awareness campaigns - conducted to assist with helping Employees and Outsourced Staff understand why it is important to remain hydrated during summer months.

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.

Kempinski developed a comprehensive policy entitled, 'White Glove Services' which outlines the hotel's guidelines relating to precautionary measures for Covid - all employees and outsource workers completed the necessary training. In addition, Covid precautionary measures were shared by the government of Qatar for all businesses which were monitored by health officials to ensure that 100% compliance was achieved. Kempinski received a certificate of achievement for meeting all of the requirements.

Covid precautionary letters and a Covid 19 Audit was sent to all suppliers setting out our expectations for adequate measures to be in place and to check this through the answers to the audit questions in order to keep people safe. The suppliers had to confirm that they were in compliance with Covid guidelines which were communicated by the government and Kempinski.

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?

For Employees:

Employees live in provided accommodation (unless they get a Live-Out Allowance), which include all required facilities. Inspections are regularly carried out by the HR and Hotel Management, to make sure that accommodation remains up to standard. All units are equipped with fire safety equipment (i.e. extinguisher, fire blankets), have security personnel in place, are regularly cleaned to a high standard and are treated for any pests as necessary. Transportation to and from accommodation is provided to cover all the shifts (24/7). Transportation to hospitals is arranged in cases of emergency, and leisure transportation (i.e. to malls or shopping centres) is also available.

For Outsourced Staff:

Suppliers provide accommodation for outsourced workers. Our "Labour Standards for Third Party Providers" require that accommodation provided respects the local laws & standards. One of our contractual clauses states: "*Any living arrangements provided to the staff need to be in accordance with the requirement of local law, such as accommodation, where part of local employment practice. The hotel/residence needs to have the contractual right to do spot checks on the living arrangements of outsourced staff at their discretion.*"

Part of our supplier auditing process which is done on an ad-hoc basis, our hotels conduct inspections to the accommodation premises of suppliers and address concerns.

The Supreme Committee routinely conducts accommodation inspections independently according to their own strict audit standards and shares their findings if any for rectification.

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.

To address Covid precautionary measures at the accommodation, sanitizers were installed, masks and gloves were made available to the employees which are available daily from the HR Office located at the accommodation. In addition, informational posters provided by the government were placed in each villa so everyone was aware of the necessary health protocols. These measures were evaluated and approved by the Supreme Committee during the last accommodation audit.

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.

Our company abides by the Kempinski Code of Conduct and Business Ethics which is available on our Company website,

https://kempinski-dev.s3.amazonaws.com/34377791/code-of-conduct-and-business-ethics_final.pdf

The Code of Business Conduct covers sexual abuse, exploitation and harassment and imposes sanctions on any practices thereof for which we have zero tolerance. At Kempinski, all team members have a responsibility to ensure that the welfare and safety of others consistently remains a top priority and consideration.

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)? During new hire orientation, the Code of Conduct Policy is communicated to all employees. Since October 2020, outsource workers are also required to attend a short orientation which covers Code of Conduct training. This training is conducted by the HR Team and employees are encouraged to voice their concerns if their rights are violated. The Code of Conduct and Whistleblowing policies are also displayed on notice boards in the back of house employee areas.
- How are business partners are made aware of company policies and reporting protocols (e.g. Trainings and guidance manuals)? Through the Labour Standards for Third Party Providers policy and through the supplier agreement that they sign. The provider also acknowledges the Kempinski Code of Conduct & Business Ethics and accepts staff assigned to our premises to be asked to adhere to it and be instructed in the use of the whistleblowing policy in case of any malpractice.
- Are both directly employed and subcontracted workforces able to anonymously report allegations of abuse? Yes. Employees and outsource staff can, at any given time, raise concerns and we have our Whistleblowing policy covering the process and protocols. Through our Speak-Up channel, not only can employees raise their issues anonymously, but they have direct access to the highest management members including the Chief Human Resources Officer and Chief Executive Officer. This policy is communicated throughout the orientation program for all our new joiners and it is displayed continuously on notice boards.
- What steps do you take to protect direct workers and subcontracted workers from retaliation or intimidation for reporting abuses?
It is communicated in the Labor Standards for Third Party policy that *Staff are not deprived of any rights of free speech or association. Staff have a possibility to submit their grievances in anonymous ways to the contractor, and the contractor has a process to record, review and take the grievances into consideration for further action.* Should there be any indications of malpractice by a supplier through whistleblowing from outsourced staff or external sources, the improvement areas need to be sent to the supplier as a warning and be rectified within a given deadline of maximum 30 days, after which an immediate renegotiation of the contract, and if required change of provider, needs to take place.
- 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? The Code of Business Conduct covers sexual abuse, exploitation and harassment and imposes sanctions on any practices thereof for which we have zero tolerance.

Whistle Blowing posters are placed throughout the property. During interviews with contractors, they are reminded of our open door policy and encouraged to share any challenges that they face in the workplace.

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?

No grievances of such nature were raised. However, as a protocol, we strictly adhere to the Kempinski Code of Conduct and Business Ethics. We are bound to fully investigate all grievances raised, protect the confidentiality of the employees raising the concern and take remedial action as necessary.

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?

We have several mechanisms in place to allow Employees to raise their ideas. These include monthly Welfare Committee meetings with employee representatives from different departments and nationalities; regular GM meetings with employees; GM and HR Townhalls conducted usually every month and attended by all employees; and departmental meetings led by the Heads of Department. During the Orientation and Town Halls, employees are reminded of the grievance procedure in place, should they wish to raise any concerns.

Once every year and for our directly hired employees, Kempinski hotels worldwide conduct an engagement survey, fully confidential and administered by a third party. The employees have the chance to add comments which are then reviewed by the Chief HR Officer and CEO of the company. Access to these comments is granted at property level only to General Managers and HR Leaders for action planning purposes.

For the Outsourced Staff, the HR conducts regular interviews by random selection to learn about concerns and to take necessary measures to rectify them. Also, the HR leaders conduct daily rounds, speaking with employees and encouraging an Open-Door approach.

In addition to these mechanisms, an employee Welfare Committee is in place where employees meet every month and serves as a forum to share concerns that are addressed by the HR Team and the General Manager.

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?

Employees are encouraged to raise any grievance with their managers or anonymously via our whistle-blower channel. These options are communicated to all employees during the onboarding process, town halls and via bulletin boards.

Concerns can also be raised through the annual Employee Engagement Survey, which also provides space for open comments.

For the Outsourced Staff, they are being advised that they can and should approach the HR department in case they face any concerns with their direct employers.

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?

No grievances were raised in 2019 and 2020. Ongoing audits and inspections are designed to address any potential issues before they occur.

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?

The Kempinski brand is based on the capabilities and talent of our people. Their pride in what they do underlines our approach of delivering the highest standards across our network in the Gulf region and worldwide. For this reason, and as outlined in the above responses, Kempinski strives to provide a safe and enjoyable working environment for Employees and Outsourced staff at any time. That is why we adhere to all local labor practices, laws and legislation, and require that all our suppliers do the same. We see it as our responsibility to ensure we're doing all we can to monitor and secure compliance amongst these suppliers. We're committed to continuing with our comprehensive internal auditing process, addressing our workers to identify whether they have any concerns, providing anonymous channels for employees to speak up, and taking decisive action where needed.

In Qatar, our hotels have volunteered to collaborate with the Supreme Committee for Delivery & Legacy who launched Workers' Welfare Standards for the upcoming 2022 World Cup.

[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.

[Additional information re Kempinski's work with the Supreme Committee]

Yes, we do refer to the Supreme Committee For Delivery & Legacy, Workers' Charter. Kempinski has been working closely with the Supreme Committee since November 2019 ahead of the World Cup. Meetings and visits from the Committee members and follow-up sessions to rectify any matters took place ever since and are still ongoing to date. The Supreme Committee's audits are extremely rigorous and contain not only elements of the Labour Law, but also their own standards. Please note that The Supreme Committee audits are ongoing not only with Kempinski but with all businesses in Qatar and will continue until 2022 once the FIFA World Cup begins. As with audits, areas to finalize or that need additional supporting documents, are updated each time.

Moreover, the Supreme Committee works directly with all of the outsourced companies associated with the hotel and they are held to the same standards and guidelines of the Supreme Committee to ensure they are compliant.