

# Human Rights Strategy Statement

## I. Introduction

Whitbread recognizes its responsibility as the UK's largest hotel and restaurant business with a growing hotel business in Germany, to ensure sound social, ethical and environmental practices within our own operations and our supply chain, in every market in which we operate.

Whitbread PLC is headquartered in Dunstable, United Kingdom, and is the ultimate parent company of the Premier Inn companies in different local jurisdictions, including Premier Inn Holding GmbH, the holding company of the Premier Inn business in Germany. We and our German business are committed to implementing the human rights and environmental due diligence requirements in our own business and our supply chain in accordance with the German Supply Chain Due Diligence Act (GSCA).

Also, in line with the UN Guiding Principles on Business and Human Rights, the UK Modern Slavery Act and the GSCA we acknowledge our responsibility to respect the human rights of our own workforce and every worker supplying goods or services to us. They all deserve the right to live in dignity and work in a safe workplace and we take our part in respecting this right very seriously. Moreover, we understand that when workers are treated with respect, work in civilised conditions, and earn fair rates of pay, both they and their companies benefit from increased commitment and productivity.

The purpose of this Human Rights Strategy Statement is to detail how Whitbread is committed to detect and address the human rights and environment-related risks potentially arising within its supply chain and its own business area.

The basic principles outlined in this Human Rights Strategy Statement, the Whitbread Code of Conduct and the Responsible Sourcing Policy guide us when we do business in the UK and our local jurisdictions. This Human Rights Strategy Statement, the Whitbread Code of Conduct and the Whitbread Responsible Sourcing Policy constitute a minimum and not maximum standard and should not be used to prevent us or prevent our suppliers and business partners from exceeding these standards.

## II. Supply Chain Risk Assessment and Risk Management Processes

### Risk Assessment

We will conduct annual and ad-hoc human rights and environmental risk assessments. These assessments will be based on both the supplier's country of operation and associated sector risk. Our current methodology utilises open-source datasets and internal data to create a comprehensive and objective risk score for each country and sector and supplier.

### Risk Management

All major suppliers must complete a supplier questionnaire in our contract management platform Arcus. As part of this, suppliers are requested to accept our Responsible Sourcing Policy and any other relevant responsible sourcing policies (for specific materials being procured). Our Responsible Sourcing Policy is aligned with the ILO convention, ETI base code and the requirements of the GSCA to ensure it is robust and fit for purpose.

Whitbread has also implemented a banned countries list through Arcus. This is a list of countries which cannot be sourced from directly or indirectly and compliance through the contract management platform is mandatory for both tender and contract renewal. This list is reviewed

annually - these countries have been selected due to level of associated risk and despite best efforts human rights safety cannot be guaranteed.

After completing an inherent and actual risk assessment of suppliers, we will then seek to assess whether suppliers have up to date SMETA audits (or other equivalent ethical audits) in place and where not work with suppliers to implement this.

We are committed to cooperating with our suppliers to find ways to end or mitigate any detected breaches, and, to the extent possible, to prevent further breaches. We reserve the right to terminate the supplier relationship if necessary.

We regularly monitor and assess our suppliers' efforts to uphold the principles of the responsible sourcing policy.

To support suppliers in the implementation of the GSCA we will also provide training or training materials for-suppliers, as required.

Suppliers applying our Responsible Sourcing Policy are also expected to comply with national and other applicable law and, where the provisions of law and the policy address the same subject, to apply that provision which affords the greater protection to workers.

We recognize there may be local socio-economic, cultural, and traditional constraints to consider, but our implemented and regularly reviewed processes allow us to work collaboratively with our supply chain and all business partners to achieve our ambitions.

### **III. Complaints Procedure**

We have implemented a complaints procedure that is available to business partners such as suppliers or service providers or their employees, our customers or other third parties. The complaints procedure will enable persons to report human rights and environmental related risks as well as violations. Complaints will be reviewed internally with General Counsel and the Whitbread Sustainability team, triggering a remediation process.

Complaints can be filed via our third party operator Safecall Ltd at [www.safecall.co.uk/whitbread](http://www.safecall.co.uk/whitbread). Complaints can also be filed anonymously. All complaints will be reviewed and processed by General Counsel and the Responsible Sourcing Manager.

### **IV. Identified and Prioritized Human Rights Risks**

We have been conducting annual human rights risk assessments of our suppliers at Whitbread group level before the implementation of the GSCA, and have identified and prioritized the following risks:



Going forward we will have started to look to extend our risk assessment at group level to include the protected environmental positions, in line with the GSCA. We will update this section with relevant details following the completion of our annual risk assessment process this year. Details of the human rights and environment-related risks that are prioritized by Whitbread following this new assessment will be set out in due course.

## V. Documentation and Reporting

We will

- conduct an annual and ad-hoc review of all relevant risk assessment and risk management processes as well as our complaints procedure and this human rights strategy;
- document fulfillment of our obligations and store records for 7 years;
- publish and file an annual report. We will publish our first report in 2024.

## VI. Expectations of Employees and Suppliers

We expect all our employees to adhere to and apply the principles outlined in the Whitbread Code of Conduct in their day-to-day work. To ensure an effective implementation of the GSCA requirements relevant employees and functions will receive regular training.

In addition, we have a whistleblowing hotline which we encourage all Whitbread employees to use to draw our attention to potential breaches of laws or our internal policies. We review the effectiveness of this reporting channel on a regular basis to increase efficiency.

Due to the way our hotel operations are structured in Germany we assume a low human rights and environmental risk in our own operations in Germany.

We expect from our direct suppliers to comply with our Responsible Sourcing Policy and their contractual obligations. Our standard supplier contracts provide for a collaboration to address, abolish or minimize adverse effects caused by the supply of products or services to human rights or the environment. We reserve the right to end supplier relationships if a supplier violates our standards and is not working with us to abolish or minimize breaches or risks.



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