

## OUR COMMITMENT TO HUMAN RIGHTS

Hilton is committed to promoting human rights – the basic rights and freedoms inherent to all human beings. We conduct our business operations in a manner that respects human rights as defined in the **International Bill of Human Rights** and avoids complicity in human rights abuses. We are a signatory to the **United Nations (UN) Global Compact**, and we consider the **UN Guiding Principles on Business and Human Rights** and the **OECD Guidelines for Multinational Enterprises** as best practices for managing human rights risks.

We document our dedication to human rights in our Human Rights Principles and in our policies, including our Code of Conduct, our Harassment and Violence-Free Workplace Policy, our Equal Employment Opportunity Policy, and our Responsible Sourcing Policy.

If there is a practice or an incident that is inconsistent with our principles or our policies, we want to know about it. We maintain a hotline that is available 24 hours a day, 365 days a year. Anyone, internal or external to Hilton, can make a report through the hotline about our corporate offices and owned, leased and managed properties, and we will conduct a thorough investigation into that report and take appropriate action.

We are dedicated to filling the earth with the light and warmth of hospitality, and we know that promoting human rights is critical to achieving that goal. That's why our corporate offices; owned, leased and managed hotels; owners of managed properties; owners of franchised properties; companies that manage franchised properties; and suppliers all are required to abide by the principles set forth in this document.

## OUR PRINCIPLES

Our core human rights principles are:

- **Ethical Standards.** We hold ourselves to the highest ethical standards, which are set forth in our [Code of Conduct](#). We have a culture of integrity and we promote business ethics.
- **Healthy and Safe Environment.** Hilton is committed to creating and maintaining a healthy and safe environment for our Team Members and guests.
- **Anti-Harassment & Non-Discrimination.** Hilton values diverse people, talent and ideas. We have a zero tolerance policy for harassment or discrimination based on any personal characteristic protected by law. Hilton's Harassment and Violence-Free Workplace Policy outlines our commitments to prohibiting all forms of harassment, including sexual and non-sexual harassment.
- **Prohibition Against Human Trafficking, including Sexual Exploitation.** Hilton condemns all forms of slavery, forced labor, human trafficking and commercial exploitation. As signatories of the ECPAT Tourism Child-Protection Code of Conduct, Hilton is fully committed to protecting individuals from all forms of abuse and exploitation.

- **Inclusivity.** Hilton is committed to an inclusive workforce that fully represents many different cultures, backgrounds and viewpoints. We also are committed to ensuring equal opportunities for our Team Members and complying with all local laws and policies addressing equal opportunity. Hilton's Equal Employment Opportunity Policy ensures all Team Members are provided with equal opportunities with respect to employment, promotion decisions and remuneration within set compensation and benefits strategies, country-specific statutory requirements and other relevant factors.
- **Privacy.** Hilton is committed to respecting Team Members' and guests' privacy rights. Hilton only gathers personal information for legitimate business purposes and does so in a reasonable manner and in accordance with applicable laws.
- **Responsible Sourcing.** The [Responsible Sourcing Policy](#) establishes the standards Hilton suppliers must meet. Our suppliers are obligated to comply with fundamental principles including: promoting human rights, complying with laws, engaging in fair purchasing practices and fair dealing, and preventing bribery and other corrupt practices.

## HOW HILTON PROTECTS HUMAN RIGHTS

Hilton identifies, evaluates and mitigates human rights impacts in the following ways:

### 1. Mapping

Hilton operates at a global scale, with a complex supply chain. We recognize the human rights risks associated with operating in the hotel and tourism sector, including but not limited to the risk that hotels around the world may be used by traffickers for commercial sexual exploitation.

We undertake human rights mapping exercises to understand supply chain and human rights-related risks. We map 100% of our hotels and pipeline countries against independent environmental and social risk indices that are updated at least annually. This analysis informs the prioritization of our work, including the deployment of tools and processes at managed hotels and efforts to make such tools available for franchise business partners, particularly in higher risk areas.

### 2. Due Diligence

Hilton conducts human rights due diligence across our global operations and in our supply chains to identify, address and mitigate adverse human rights impacts. We both utilize the EcoVadis platform and our own internal due diligence process to assess third parties' practices with respect to human rights. The results of our due diligence efforts inform updates to our policies and procedures to strengthen our human rights approach.

### 3. Risk-Based Approach

We consider various risks that drive the level of due diligence and compliance checks, as well as contractual obligations, that we require of third parties. These risks include country, sector, transaction terms, and business relationship type and duration.

For the latest updates on risk mapping and actions taken, please refer to Hilton's annual Environmental, Social and Governance (ESG) Report: [www.cr.hilton.com](http://www.cr.hilton.com).

### 4. Contractual Terms

We contractually obligate our suppliers to meet the standards established in our Responsible Sourcing Policy. The Responsible Sourcing Policy includes the human rights principles set forth in this document as well as other principles, such as sustainability and anti-money laundering, that suppliers must commit to and abide by.

### 5. Training

Hilton requires all of its Team Members to complete training on our Code of Conduct. All hotel-based Team Members also are required to complete training on how to identify and report signs of human trafficking. A list of signs to identify risks of human trafficking for sexual exploitation and forced labor is posted in Team Member areas at all managed hotels globally. In the United States, we place posters to raise awareness of the U.S. National Anti-Trafficking Hotline in guest-facing areas of our managed hotels, as required by some state laws, and we share available resources with franchised hotels.

To further mitigate human rights risks, we are focused on educating stakeholders and collaborating with leading organizations about human rights issues. In 2019, we made our training on the risks of modern slavery in labor sourcing available at no charge to the hospitality industry via the International Tourism Partnership (ITP, now known as the Sustainable Hospitality Alliance).

### 6. Key Performance Indicators (KPIs)

Hilton communicates with its stakeholders both internally and externally regarding how it addresses impacts and publishes its progress in its annual ESG Report and UK Modern Slavery Act statement. Hilton's 2030 Travel with Purpose goals include embedding human rights due diligence across our global operations and our supply chain, partnering with suppliers to eradicate all forms of forced labor or trafficking, and creating and partnering with cross-industry networks to advance international human rights. Hilton articulates KPIs for each goal and monitors its progress towards those goals.

### 7. Remediation, Disputes and Grievances

Hilton has established mechanisms for Team Members and others to raise concerns about potential human rights violations. The Hilton Hotline is an anonymous reporting mechanism available for anyone to report concerns regarding our corporate offices or leased and managed properties. The Hotline also is available externally to suppliers, business partners, consumers and community members. For managed hotels, Hilton directly reviews and

investigates Hotline reports, tracks findings and responsive actions, and protects Team Members who make reports from retaliation. For franchised hotels, Hilton ensures allegations are formally communicated to the relevant franchise owner with reminders about the franchise owner's contract obligations, the brand standards and the law. Hilton's Global Compliance team is responsible for ensuring all Hotline reports receive appropriate review and response. On a quarterly basis, the Global Compliance team provides confirmation to Hilton's Board of Directors and external auditors that all Hotline reports have received appropriate treatment. The Global Compliance team also engages in benchmarking to ensure the Hilton mechanism is functioning effectively in terms of expected volume of reports.

## 8. Partnerships and Alliances with NGOs and Advocacy with Trade Associations

Hilton understands that human rights risks in the travel and tourism industry are complex, and we recognize we cannot solve them on our own. Accordingly, we engage proactively with industry and expert organizations to raise awareness of human rights issues, develop solutions, and shape public policy and legislation to reduce human rights abuses and human trafficking.

- Since 2011, we have been signatories of the ECPAT Code of Conduct to fight the sexual exploitation of children in travel and tourism, and we have been providing their training on identifying signs of trafficking to all our hotels.
- To combat risks of trafficking for sexual exploitation, we have partnered with Vital Voices since 2012 and co-founded the Global Freedom Exchange program in 2013 to support women leaders at the forefront of anti-human trafficking efforts.
- In 2016, we co-founded the UK Stop Slavery Hotel Industry Network, led by Shiva Foundation, which brings together hotel brands, operators and owners, providing tools to help procurement teams address forced labor and modern slavery risks in the supply chain.
- Hilton President and CEO Chris Nassetta, who served as Chair of the World Travel and Tourism Council (WTTC) from 2018 through 2020, supported the launch of the ECPAT/WTTC Call for Action for the Protection of Children in Travel and Tourism in 2018 and co-founded the WTTC Anti-Trafficking Task Force in 2019.
- We are co-founders of the International Tourism Partnership (ITP), now known as the Sustainable Hospitality Alliance, and an active member of their Human Rights working group which helped make Hilton's training on modern slavery risks in labor sourcing publicly available to the hospitality industry at no cost starting in December 2019.
- In 2019, Hilton proactively participated in a series of workshops for the hotel industry in Qatar on fair recruitment organized by the ITP, the International Labour Organization, the Qatar Ministry of Administrative Development, Labour and Social Affairs and the Institute for Human Rights and Business, sharing best practices and contributing to the creation of industry-wide tools.
- We are members of the Global Business Initiative on Human Rights, a coalition that works to advance human rights in a business context through cross-industry peer learning, outreach and capacity building.
- In 2019, Hilton collaborated with the It's a Penalty campaign to raise awareness about human trafficking with Super Bowl stakeholders, including Team Members, guests and NGOs. We continued our collaboration during the 2020 Super Bowl and the 2021 Euro Football tournament.

## GOVERNANCE OF HILTON'S HUMAN RIGHTS STRATEGY

Hilton's human rights strategy is part of our overall ESG strategy. Our Board of Directors works with the business to set Hilton's strategic direction and ensure the business is managed ethically and responsibly. The Nominating and ESG Committee reviews and assesses our ESG strategy, practices and policies and makes recommendations to the Board as appropriate. Our Executive Committee approves major ESG programs and monitors progress towards our Travel with Purpose 2030 goals. The Chief ESG Officer oversees Hilton's ESG strategy and reporting efforts and reports directly to our CEO, who is accountable for ESG-related issues and decisions.

For the latest information about the company's structure, please refer to [www.ir.hilton.com](http://www.ir.hilton.com).

*\*Team Members include employees at Hilton corporate offices and its owned and managed properties, and employees of franchisees who work on-property at independently owned and operated franchise properties in the Hilton portfolio.*

*Hilton reserves the right to amend or modify these Human Rights Principles. Last updated May 2021.*

