

HUMAN RIGHTS POLICY

Introduction

As a premium listed company, PPHE Hotel Group Limited, its subsidiaries, affiliates and managed hotels operating in all countries, including all Arena Hospitality Group companies (collectively “**PPHE**”, “**the Company**” or “**we**”) acknowledge its obligations to ensure comprehensive social, ethical and environmental practices within its operations, and within its supply chain, in every market in which it operates. We acknowledge that every worker deserves the right to live and work with dignity.

This Human Rights Policy (“**this policy**”) defines the basic standards of human rights that PPHE will respect at all times and which we will expect our business partners to respect at all times. These standards of human rights also form the basis of our Responsible and Ethical Sourcing Policy.

In addition to its basis in relevant local and national legislation, this policy is drawn from:

1. The United Nations (UN) Universal Declaration of Human Rights, which defines the rights every human being is entitled to, covering areas such as employment, education and dignity.
2. The International Labour Organization (ILO), a UN agency whose mission is to promote rights at work; encourage decent employment opportunities; enhance social protection, and strengthen dialogue in handling work-related issues. Its conventions create the framework for ethical labour standards.

PPHE is committed to upholding basic Human Rights and supports in full the United Nations Universal Declaration of Human Rights and the International Labour Organisation Core Conventions.

This policy was approved at a meeting of the Board on 31 August 2021. For questions and queries relating to this document, please e-mail compliance@pphe.com

1. Employment is freely chosen

- 1.1 We will not use forced, bonded, or involuntary prison labour.
- 1.2 We will ensure that all work performed by our people will be on the basis of a recognised employment relationship established through national law and practice.
- 1.3 We will take reasonable measures to ensure there are no trafficked individuals working in any PPHE locations, who have been recruited, transported, transferred, harboured or received for the purposes of exploitation.
- 1.4 We will fulfil our obligations to our people under labour or social security laws and regulations arising from the regular employment relationship. We will also use reasonable efforts to fulfil our obligations under the relevant labour or social security laws and regulations arising from the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes, in so far as these are applicable to these working arrangements.

2. Freedom of association and the right to collective bargaining are respected

- 2.1 In the regions where right to freedom of association and collective bargaining is not restricted under law, we recognise that our people, without distinction, have the right to join or form

associations of their own choosing and to collectively make representations to, or enter into negotiations over employment issues with their employer.

3. Working conditions are safe and hygienic

- 3.1 We will ensure that all PPHE locations have an up to date risk assessment to ensure working environments are mitigating the risk of infectious disease transmission (such as COVID-19). Employees must have been involved in the creation of such risk assessments and made aware of the significant findings and relevant control measures.
- 3.2 We will adhere to country and regional specific guidance and WHO guidance on the spread of infectious disease, including social distancing, enhanced cleaning regimes and self-isolation.
- 3.3 We will provide workers with (where required) adequate personal protection equipment (PPE) as outlined by local regulation and pursuant to risk assessments.
- 3.4 We will at all times provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards, local epidemics or global pandemics (such as the spread of COVID-19).
- 3.5 We will maintain a record of health and safety incidents with an action plan to improve performance by minimising the causes of hazards in the working environment.
- 3.6 We will provide regular and recorded health and safety training to our teams. This training should be updated as and when new measures are introduced (such as those to mitigate the risk of infectious disease such as COVID-19).
- 3.7 We will ensure that all PPHE facilities will undergo an environmental and safety risk assessment and have all required documentation and permits regarding structural, electrical, and fire safety.
- 3.8 We will ensure all our people have access to clean toilet facilities and potable water while at work, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.9 We will assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

- 4.1 We will comply with all relevant child labour laws and not employ workers under the legal minimum age as prescribed by the local laws in in different regions.
- 4.2 We will maintain appropriate documentation and systems to prevent taking children into our employment.

5. Living wages are paid

- 5.1 We will ensure that wages and benefits paid for a standard working week / month meet, at a minimum, national legal requirements.

5.2 We will provide all our people with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned.

6. Working hours are not excessive

6.1 We shall ensure that working hours comply with national laws and industry standards appropriate to the role and level of seniority.

6.2 We will provide reasonable annual leave to each of our people, based on a clear formal policy.

7. No unlawful discrimination is practised

7.1 We will fully comply with local laws regarding equality of employment opportunities. Subject only to local law, we will not discriminate in hiring, compensation, training, promotion, termination or retirement based on race, caste, nationality or national origin, ethnicity, religion or belief, age, disability, gender, marital status, sexual orientation, union membership, membership in reserve military forces or political affiliation and any other legally recognised grounds for discrimination in the different regions.

8. No harsh or inhumane treatment is allowed

8.1 We prohibit all forms of physical and verbal abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is also prohibited.

8.2 We will take only fair disciplinary action, proportionate and fully compliant with local laws.

8.3 All disciplinary actions must be recorded.