



NH | HOTEL GROUP
PART OF

MINOR
HOTELS

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PROTECTION OF
HUMAN RIGHTS

NH Collection Bogotá WTC Royal
Colombia

PROTECTION OF HUMAN RIGHTS

The principle of respect for and protection of Human Rights is integrated into the culture of NH Hotel Group and is applied to the activities carried on through the professionals, independently of the country or region where the activity is carried out. The Company is committed to complying with Human Rights and works to prevent and manage the risks associated to the breach of such rights. NH Hotel Group's international presence in countries where the defense of human rights needs to be boosted leads us to be transmitters of the concept and to ensure frameworks of relations and management are in place in which the defense of these rights is assured.

The Protection of Human Rights in NH Hotel Group

NH Hotel Group carries out its activity in a framework of commitment to the society and environment where it operates, and therefore accepts the contents of national and international agreements and treaties, undertaking to promote and comply with them. These commitments will avoid or, as the case may be, mitigate any negative consequences that its activities might cause to Human Rights.

The commitments acquired on subscribing to these international agreements guide the conduct of all the employees in the Company.

Notable among these codes voluntarily accepted by the Company are the UN Global Compact, support and contribution to the Sustainable Development Goals (SDG) and the Global Code of Ethics for Tourism, approved in 1999 by the Assembly of the UN World Tourism Organization (UNWTO). This code comprises 10 principles designed to guide key players in tourist development, aspiring to help to maximize the sector's benefits while minimizing its impact on the environment, cultural heritage and local communities.

The Company rejects any tourist activity that might constitute an attack on human rights or human dignity, paying special attention to children. Accordingly, in September 2012 NH Hotel Group joined ECPAT (End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes) for the protection of boys, girls and adolescents against sexual exploitation in tourism, also promoted by UNWTO and UNICEF.

Human Rights Policy of NH Hotel Group

In 2020, the Board of Directors approved the NH Hotel Group Human Rights Policy, a document that sets out all the principles and commitments undertaken by the Company in this regard.

The Policy establishes our commitment to respect Human Rights in accordance with the highest international standards and works to PROTECT, RESPECT AND REMEDY (prevent and manage) the risks associated to the breach of such rights.

The guiding principles on which the policy is based are as follows:



HEALTH AND SAFETY



PROTECTION OF TEAM MEMBERS' RIGHTS



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING



PROMOTION OF EQUALITY AND INCLUSION



CHILD RIGHTS AND CHILD LABOUR



RIGHT TO FREEDOM OF OPINION, INFORMATION AND EXPRESSION



RESPECT LOCAL COMMUNITIES AND THEIR ENVIRONMENT



SLAVERY, SERVITUDE OR FORCED LABOUR



CORRUPTION



INTELLECTUAL PROPERTY



PRIVACY

The policy reinforces a sound and responsible governance model, that fosters transparent and responsible management on the basis of a single corporate document with global scope that, among other aspects, will make it possible not only to manage better the risks wherever NH Hotel Group is present, but also ensure knowledge and integration of the policy in the value chain. Through this Policy, the Company undertakes to play an active role in the promotion of Human Rights and to work proactively to this end. The Policy reflects the commitments already undertaken in this regard and guarantees respect for the labor rights of all employees, customers, suppliers and partners, in all the countries where the Company is present, in accordance with ruling law in each country.

Relations with all stakeholders the Policy applies to should always be based on respect for human dignity and non-discrimination. The Company rejects all conduct, behavior or action likely to foster, promote or incite, directly or indirectly, hatred, hostility, discrimination or violence against a group for racist reasons or other reasons referring to the ideology, religion or beliefs, family situation, membership of an ethnicity, race or nation, national origin, gender, sexual orientation or identity, or due to illness or disability.

NH Hotel Group emphatically prohibits any kind of hostile or humiliating actions against people, the abuse of authority and any type of harassment, whether physical or psychological, as well as any other conduct that could generate an intimidating, offensive or hostile working environment. Furthermore, no child labor or forced labor is tolerated.

The Company also recognizes that the principle of equality of treatment and opportunities for addressees of the Code of Conduct is a principle that inspires its Human Resources policies and is applicable both to the hiring of employees and to training, career opportunities or salary levels, as well as all other aspects of labor relations with employees.

The Code of Conduct also prohibits the imposition on employees of health and safety conditions at work that damage, suppress or restrict their rights as recognized by legal provisions, collective agreements or individual contracts. No form of illegal traffic of labor or fraudulent emigration is permitted, and applicable legislation will be respected at all times with regard to the entry and transit of foreign nationals.

The Code also explicitly states that the exercise of the rights of protest, association, organization and collective bargaining in the framework of the rules regulating each of these fundamental rights and in accordance with international law and practice, in particular, the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labor Organization, will not be unduly limited.



Compliance in relation to Human Rights

As described above, in order to guarantee compliance with the Human Rights Policy, the Internal Audit department undertakes to supervise the principles and rules reflected in the Policy and, therefore, is responsible for analyzing any irregularity related to it.

NH Hotel Group has a whistleblowing channel, in order to make it easy to report any possible irregularity, breach or behavior contrary to ethics, law and the rules that govern the Company.

Possible breaches of Human Rights are handled through the Internal Audit department, which is responsible for managing the Group's Whistleblowing Channel (codeofconduct@nh-hotels.com).

The Company has also put in place a specific external communication channel to report, process and manage incidents reported by suppliers (codeofconduct@coperama.com).

The procedure for reporting and dealing with possible breaches of the Code of Conduct will be managed by the Group's Senior Vice President of Internal Audit.

In 2022, there were no reports relating to a possible breach of human rights.

Training on Human Rights

Respect for Human Rights is one of the principles on which the activity is based in all the countries where NH Hotel Group is present. It is also materialized in the development and implementation of a Policy dedicated to respect for Human Rights that strengthens and extends the commitment already established in the Company's Code of Conduct.

In order to publicize this commitment and raise awareness about Human Rights and the actions that NH Hotel Group carries out to respect these rights, the "Human Rights" online course is available to all employees and is mandatory for them.

Throughout 2022, 7,878 training hours have been completed in Human Rights

Through this course, the Company promotes commitment to and knowledge, not just of its Human Rights policy, but also the due diligence process to identify, prevent, mitigate and report potential risks and consequences deriving from the daily actions of employees, suppliers or guests.



Human Rights Due Diligence

NH Hotel Group continues with its Human Rights Risk Management project which has been implemented in different phases.

- Initially, in 2020, it carried out a process to identify the inherent human rights risks of its global operations; and the subsequent publication of the Policy that includes the commitment to respect and protect the rights identified in the Company.
- In 2021, a Corporate Due Diligence Guide for Human Rights was drawn up, as a support tool in applying the Protocol to all the Company's operations. This Guide serves as an instrument to increase the control over and the efficiency of processes, mitigate the risk of reputational damage and favor the correct public positioning of the Company. In December 2021, training in Human Rights was launched, to consolidate knowledge on human rights among all the Company's employees:
 - Initially, it was sent to the Company's General Managers and Front Office Managers, as these are the groups of employees whose job needs them to be more familiar with possible breaches of Human Rights, both to identify possible situations of risk and to know how to proceed when faced with an incident of this nature.
 - Training was then shared with all the Company's employees, providing access to the course through NH University.
- This year, an evaluation of the residual risk of breach of Human Rights in NH Hotel Group was carried out by assessing the level of compliance of the hotels with the commitments formalized in the Policy.

86% hotels assessed

Through this assessment, some more sensitive aspects were identified and will be monitored in more detail.

As part of this assessment, NH Hotel Group is analyzing the principal adverse impacts related to human rights through its own operation. Being this a starting point to draw up specific action and mitigation plans where applicable.

In addition, those Human Rights risks have proved to be the most significant in this analysis are included in the Company's risk map in the "Compliance" category, in order to monitor and control the pertinent mitigation or resolution processes.

