



NH | HOTEL GROUP  
PART OF

MINOR  
HOTELS

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PROTECTION OF  
HUMAN RIGHTS

NH Bern The Bristol  
Bern, Switzerland

# 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 out through all its 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 that frameworks of relations and management are in place in which the defense of these rights is assured.

## Protection and Promotion of Human Rights

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 Company's team members.

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

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 scope of which encompasses not only team members but also customers, partners and other stakeholders.

The Policy establishes the commitment to respect Human Rights in accordance with the highest international standards<sup>1</sup> and works to PROTECT, RESPECT AND REMEDY (prevent and manage) the risks associated to the breach of such rights.

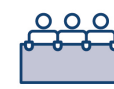
The guiding principles on which the policy is based are as follows:



Health and Safety



Protection of team members' rights



Freedom of association and collective bargaining



Promotion of equality and inclusion



Child rights and child labor



Right to freedom of opinion, information and expression



Respect for local communities and their environment



Slavery and forced labour



Corruption



Intellectual Property



Privacy

<sup>1</sup> For further details, please see the section "Regulatory Framework of the NH Hotel Group Human Rights Policy [Human Rights Policy](#). Notable among such standards are the United Nations Guiding Principles on Business and Human Rights, as well as the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights and the OECD Guidelines for Multinational Enterprises 2011 and the ILO Declaration on Fundamental Principles and Rights at Work.

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 team members, 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 labour or forced labour 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 team members and to training, career opportunities or salary levels, as well as all other aspects of labour relations with team members.

The Code of Conduct also prohibits the imposition on team members 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 labour 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 will not be unduly limited.

NH Hotel Group establishes its commitments to assure compliance with human rights in its Human Rights Policy. These commitments are developed in line with the UN International Charter of Human Rights, the declaration of the International Labor Organization (ILO) as well as the fundamental charters (freedom of association and trade union freedom, the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour; and the elimination of discrimination in work and occupation) and conventions on indigenous and tribal peoples, the OECD Guidelines for Multinational Enterprises and the European Convention on Human Rights.



NH Collection Amsterdam Flower Market  
Amsterdam, Netherlands

## Compliance in relation to Human Rights

NH Hotel Group has been working for years on governance in relation to Human Rights. This started with the publication of the Human Rights Policy and with a first self-diagnosis on this matter carried out in 2022.

The company is developing a governance model to ensure due diligence on sustainability, with a focus on human rights and the environment, both in its own operations and in those of the value chain, with a particular focus on investee companies and the supply chain. In this regard, NH has consulted its stakeholders through various mechanisms to identify potential impacts on human rights. In this regard, it should be noted that the company has carried out a self-assessment process of the main suppliers identified for each region during the financial year 2023, evaluating aspects related to compliance and non-violation of Human Rights (for more details, see the [Corporate Sustainability Due Diligence Directive](#)). B2B customers and associations with which the company works were also consulted and asked about their perception of human rights. No critical human rights issues were identified among the stakeholders consulted.

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 analysing 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 behaviour contrary to ethics, law and the rules that govern the Company.

Possible breaches of Human Rights are handled through the [Group's Whistleblowing Channel](#) managed by an independent third party. The Company also has a [Procedure for notifying, processing and resolving breaches of the code of conduct](#) under the responsibility of the Group's Senior Vice President of Internal Audit.

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

NH Hotel Group has not received any confirmed complaints through the aforementioned channels regarding human rights non-compliance, and consequently, none of the complaints received have been related to violations of indigenous peoples' rights or operations involving child labour.

As a result, in 2023 the Company has not recorded any significant impacts from a criminal, economic or reputational point of view in terms of compliance and human rights violations. Consequently, NH Hotel Group has not had to take timely corrective measures and actions in this regard during 2023, specially related to violations of indigenous peoples' rights and operations involving child labour.

## 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.
- Subsequently, 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 favour the correct public positioning of the Company.
- An assessment of risks in relation to human rights was carried out in all the hotels under ownership, lease and management, through an assessment questionnaire. Thanks to this, it was observed that all hotels are aware of the human rights policy and commitments, including the Code of Conduct or the specific policies concerning human rights, although in some cases it is necessary to keep moving forward in this regard to reinforce these commitments, making them public and providing training to team members.

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

*86% of hotels assessed*

In the assessments carried out, NH Hotel Group considers that the level of risk of breach is low in all hotels. Thanks to this assessment, a low likelihood of situations of breach of human rights in the hotels in the portfolio was identified, and the most sensitive aspects identified are related to the workplace environmental and work conditions.

NH Hotel Group also considers that this exercise has generated a very positive effect in the hotels, where most of them have implemented improvement projects and have promoted training for all team members in the hotels.

In addition, the most significant risks in relation to Human Rights that came to light 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 resolutions processes.

In 2024 NH Hotel Group will review the Due Diligence processes in relation to third parties, focused on protecting Human Rights, in line with the proposal of the new European Corporate Sustainability Due Diligence Directive (CSDDD). The regulation sets out new lines of work and NH Hotel Group is working to align the Company's management activity to the new regulatory environment. .

## Training on Human Rights

Respect for and protection of Human Rights are part of the culture of NH Hotel Group. The Company is committed to respect for the dignity and rights of all persons and works proactively to avoid any abuse related to its activity or that of its collaborators.

This commitment is reflected in the Code of Conduct, in the Human Rights Policy and in different internal regulations and procedures as well as training on these matters which is mandatory for all team members. This training promotes knowledge not only of the Company's Human Rights policy, but also of the due diligence process to identify, prevent, mitigate and report potential risks and consequences deriving from the daily action of team members, suppliers or customers.

*"In 2023, 4,422 training hours have been completed on Human Rights"*

