

# POLICY

## Kempinski Human Rights Policy



### Preamble

Kempinski enacts its strong commitment to acknowledge and respect human rights for all people. Our Human Rights Policy provides fundamental standpoints in relation to the company's business conduct and adherence to human rights international guidelines. As a multinational key luxury hospitality player, with an ever-growing sphere of influence, Kempinski seeks to manage its direct and indirect impact on human rights, alleviate potential risks, and facilitate an environment where human rights thrive and live up to the expectations of the general public and of our stakeholders, among which are governmental entities and local community.

Kempinski's understanding of "human rights" is based on the definition provided by the Human Rights Office of High Commissioner of the United Nations: "Human rights are rights inherent to all human beings, whatever the nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and indivisible."<sup>1</sup>

### Scope

The Kempinski Human Rights policy is applicable to the Kempinski Corporate and Regional Offices as well as to all Kempinski branded and affiliated hotels and residences. Moreover, Kempinski communicates its principles and encourages adoption thereof within its value chain including but not limited to suppliers, business collaborators and owners.

### Overview

Our approach to human rights is governed by internationally recognised standards. We refer to the following treaties, covenants, and global norms to guide our approach:

- **Universal Declaration of Human Rights<sup>2</sup>** and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights

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<sup>1</sup> <https://www.ohchr.org/en/issues/pages/whatarehumanrights.aspx>

<sup>2</sup> <https://www.un.org/en/universal-declaration-human-rights/>

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- **International Labour Organization's (ILO) Core Conventions<sup>3</sup>**
- United Nations Guiding Principles on Business and Human Rights<sup>4</sup>
- OECD Guidelines for Multinational Enterprises<sup>5</sup>

## Policy Statement

This policy expresses Kempinski's commitment as an international company towards the observance of Human Rights. Kempinski commits to conduct its business and operations by respecting a strong set of values and ethical practices, consistent with international human rights principles and standards.

### Key areas of impact

#### **Human Rights of our employees**

At Kempinski, we believe that all our employees should be treated with respect and dignity, worldwide. Respecting employees' Human Rights is the solid foundation of our business and everyone at Kempinski is expected to observe and honour such fundamental rights, individually and collectively. To safeguard Human Rights, Kempinski has in place a Code of Conduct and Business Ethics, as well as a Whistle Blowing Policy.

#### **Human Rights of employees in the Kempinski value chain**

Kempinski recognises that all people part of our value chain must be treated in the same way that Kempinski employees are treated. Kempinski has a zero-tolerance approach to human rights abuses, including forced labour, any form of modern slavery or human trafficking or the exploitation of children. We require our suppliers and business partners' commitment to sustainable employment and human practices through the implementation of our Policy Regarding Labour Standards by Third Party Providers, consisting in a comprehensive set of standards that we expect our providers to strictly adhere to.

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<sup>3</sup> <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

<sup>4</sup> [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>5</sup> <http://mneguidelines.oecd.org/mneguidelines>

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### **Workplace Diversity**

Kempinski places great value on the diversity within its business operations and does not condone discriminatory practices. As a multinational company, Kempinski embraces and promotes workplace diversity, and does not discriminate on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status, in line with the Universal Declaration of Human Rights. Particularly, strong emphasis is placed on gender equality, and we remain committed to fairness in terms of pay and advancement opportunities, independently from the gender of an employee.

### **Kempinski tools, workplace policies and practices**

At Kempinski, we operate under the conviction that success is not only defined by profits but also by the mark we leave on our people and society. We are therefore consistent in our approach of acting responsibly and committed to observing sensible and conscientious workplace practices, with ethical business conduct and good corporate citizenship serving as foundations.

### **Code of Conduct & Business Ethics<sup>6</sup>**

Kempinski strongly believes that maintaining high standards of ethics, integrity and professionalism across the organisation and running the business in accordance with all applicable laws and regulations is an integral part of its identity. Above all else, we act with integrity, keep high standards and use good judgment. We define success as achieving our goals while conducting our business with the highest moral and ethical standards.

### **Kempinski Modern Slavery and Human Trafficking Statement**

In accordance with the UK Modern Slavery Act<sup>7</sup>, Kempinski issues a Modern Slavery and Human Trafficking Statement, in recognition of our responsibility as a business to avoid slavery and human trafficking taking place in our business and in our supply chain.

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<sup>6</sup> [https://kempinski-dev.s3.amazonaws.com/34377791/code-of-conduct-and-business-ethics\\_final.pdf](https://kempinski-dev.s3.amazonaws.com/34377791/code-of-conduct-and-business-ethics_final.pdf)

<sup>7</sup> <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

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### **Whistle Blowing Policy<sup>8</sup>**

This Policy provides employees with a channel to raise concerns related to breaches of the Code of Conduct and Business Ethics directly to the highest management level within the organisation. At Kempinski, we believe that all such concerns are of utmost importance and we conduct thorough investigations, while remaining committed to protect, where needed, the identity of the complainant. This way, we create an environment where employees feel safe to come forward and trust the organisation to care for their rights and interests.

Moreover, we provide all our stakeholders with the opportunity to share concerns via [sustainability@kempinski.com](mailto:sustainability@kempinski.com).

This can be found on our public domain at <https://www.kempinski.com/en/hotels/about-us/sustainability/our-sustainability-approach/>

### **Policy Regarding Labour Standards by Third Party Providers<sup>9</sup>**

This policy outlines the principles that have to be complied by contractors regarding the provision of external temporary staff working in our properties. The policy is addressed to all those who are involved in the negotiation and supervision of our contractors. It furthermore addresses a mandatory review of supplier agreements regarding the provision of contracted staff / casual labour and due diligence related to the compliance with basic Kempinski standards.

### **Internal Training & Awareness**

Kempinski makes sure to thoroughly communicate and explain our commitment to human rights and related global compliance policies to all employees upon them joining the organisation, as part of their mandatory onboarding process. These policies are also communicated to our third-party employees, in accordance with the Policy Regarding Labour Standards by Third Party Providers. Although not directly employed by our hotels, Kempinski encourages them to share concerns and grievances they might have in relation to their employer, and conducts random interviews as part of the audit on compliance with the Policy Regarding Labour Standards by Third Party Providers.

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<sup>8</sup> [https://kempinski-dev.s3.amazonaws.com/34377789/policy\\_whistleblower\\_final.pdf](https://kempinski-dev.s3.amazonaws.com/34377789/policy_whistleblower_final.pdf)

<sup>9</sup> <https://kempinski-dev.s3.amazonaws.com/34394674/policy-regarding-labour-standards-for-third-party-providers-2020-version.pdf>

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### **Human Rights breaches and remedy**

In cases where human rights are not properly acknowledged, we engage ourselves to take immediate corrective action that may ultimately lead to the termination of the relationship between Kempinski and the individual or party breaching our Human Rights Policy.

At the same time, we remain committed to conducting our due diligence to identify existing or prospective human rights breaches within our organisation and value chain and mitigate such risks through adequate measures. To this end, Kempinski will continue to strengthen its policies, diligence processes, investigation practices and communication mechanisms.

Moreover, we anticipate an increased risk of running into human rights breaches in various geographical areas of our business operations where cases of such practices are publicly known. In these particular cases, Kempinski will encourage and strongly recommend practices that correspond to international human rights standards, in line with our policies.

### **Governance / Responsibility**

All Kempinski stakeholders are expected to uphold and abide by our Human Rights Policy and related compliance policies.

Executive oversight and responsibility of the Human Rights Policy lies with our Chief Executive Office, Management Board Members and Vice President Sustainability.

Our corporate Human Resources Department is responsible for establishing policies and regulations related to the respect of human rights throughout the organisation in relation to labour, and ensures the process is in place to establish compliance with the related corporate regulations.

Corporate functions cooperate with corresponding functions on regional and hotel level to ensure a uniform understanding and implementation of human rights practices.