

Best Practice Commitment on Employment and Human Rights

To incorporate into HR Manuals.

[X Hotel] 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. We are committed to working towards embedding the following policy, as guided by UK employment law, into our existing policies and documents as appropriate.

1. Employment

- 1.1. We will not use forced, bonded, indentured or involuntary prison labour.
- 1.2. We will ensure that all work performed by our employees and subcontracted employees will be on the basis of a recognised employment relationship established through national law and practice.
- 1.3. We will not avoid our obligations to our employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes.
- 1.4. We specifically commit to prohibiting the following types of behaviour in our direct employment practices and in our indirect employment practices (e.g. when recruiting through an agency):
 - 1.4.1. Deceiving employees or making false promises about terms or types of work.
 - 1.4.2. Failing to provide contracted employees with a contract or a document outlining key terms, as required under Section 1 of the Employment Right Act.
 - 1.4.3. Changing the terms of employment to be less favourable to the employee without notice.
 - 1.4.4. Deducting or withholding paychecks or imposing financial penalties on employees, including employees who quit, unless specified and agreed to in their employment contract or Staff Handbook.
 - 1.4.5. Forcing employees to live in employer housing and/or charging unreasonable prices for rent or food.
 - 1.4.6. Inducing indebtedness by falsifying accounts, charging inflated prices, reducing value.
 - 1.4.7. Requiring workers to lodge financial deposits.
 - 1.4.8. Confiscating employee ID and/or travel documents such as visas or passports.
 - 1.4.9. Abusing (including sexual and psychological harassment) or threatening to abuse an employee.
 - 1.4.10. Depriving employee(s) of food, shelter, or other basic necessities during their working day.
 - 1.4.11. Restricting freedom of employee movement.
 - 1.4.12. Using the personal information of an employee inappropriately.
 - 1.4.13. Requiring child labour that prevents or interferes with school attendance.

2. Freedom of association

We recognise that our employees, without distinction, have the right to join or form trade unions or other comparable, employee organisations of their own choosing. We recognise their right to express their views and will provide reasonable opportunities for them to do so.

3. Working conditions

We will, to the best of our ability and in line with our Health and Safety Policy, endeavour to:

- 3.1.** Provide a safe and hygienic working environment at all times.
- 3.2.** 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.
- 3.3.** Provide regular and recorded health and safety training to our teams.
- 3.4.** Ensure all our employees have access to clean toilet facilities and potable water while at work.
- 3.5.** Assign responsibility for health and safety to a senior management representative.

4. Child labour

- 4.1.** We will comply with all relevant child labour laws and not employ individuals who are under age in the UK, or outside of the UK, as designated by ILO conventions.
- 4.2.** We will maintain appropriate documentation and systems to prevent taking children into our employment directly or indirectly.

5. Fair wages

- 5.1.** In the UK, we will comply with the minimum wage and outside the UK will ensure that wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards or industry benchmark standards.
- 5.2.** We will pay overtime at an overtime rate or in equivalent days in lieu.
- 5.3.** We will provide all our employees with written information in respect to wages before they enter employment.
- 5.4.** We will not make deductions from wages, except as permitted by law or in accordance with the worker's contract.

6. Working hours and annual leave

We will comply with the Working Time Regulations in the UK and outside the UK shall ensure that working hours comply with national laws and industry standards appropriate to the role and level of seniority.

7. Discrimination

We will comply with the Equality Act and will comply with all applicable laws regarding equality of employment opportunities.

8. Humane treatment

- 8.1.** We prohibit all forms of physical and verbal abuse; the threat of physical abuse, sexual harassment or other forms of intimidation is also prohibited. This includes face-to-face interactions as well as communications by phone, email, social media or Internet.
- 8.2.** We will take fair disciplinary action, proportionate and fully compliant with applicable laws.