## **Principles of Implementation**

To make available to suppliers accompanying a Supplier Code of Conduct.

[X Hotel] understands that improving social and ethical standards in the supply chain is a challenging process that requires the cooperation of its employees, suppliers, business partners and other stakeholders. We also recognise that compliance to the Supplier Code of Conduct may not be immediately achievable, but we are committed to working collaboratively towards this goal. The principles of implementation herewith recognise this challenge and set out a process of continuous improvement with the ultimate objective of achieving compliance to the Supplier Code of Conduct.

## A. To drive continuous improvement, we commit to the following principles:

- a. Work to fair, transparent and mutually agreed terms and conditions.
- b. Make payments for services provided on time and in full.
- c. Work collaboratively with suppliers to improve social and ethical standards where our support is needed and is appropriate.
- d. Acknowledge specific national, regional or cultural challenges.
- e. Protect the confidentiality of information entrusted to us.
- f. Recognise suppliers' own standards where they are comparable to our own.
- g. Ensure that all relevant employees are aware of the Business Partner Code of Conduct.
- h. Include transparent environmental, social and ethical performance criteria in our supplier selection processes.
- i. Cease trading with suppliers demonstrating persistent disregard for this Supplier Code of Conduct.
- j. Give appropriate consideration to the impact of ceasing trading on suppliers and the communities in which they operate.
- k. Comply with the UK Bribery Act Legislation.
- I. Work to integrate the UN Guiding Principles on Business and Human Rights throughout our supply chain and in our own operations.

## B. In conjunction with the principles of implementation, we will:

- a. Allocate the resources required in order to fully implement the Supplier Code of Conduct.
- b. Communicate the Supplier Code of Conduct to all relevant employees.
- c. Assign responsibility for the implementation of this Supplier Code of Conduct to specific individuals who will provide the Board, suppliers and other stakeholders with compliance updates and implementation performance as required.
- d. Provide appropriate training and key performance measures to all employees with specific sourcing and business partner responsibilities in order to enable them to support the implementation of the Supplier Code of Conduct.
- e. Communicate this Supplier Code of Conduct to all suppliers and seek formal acceptance and commitment to its implementation.
- f. Require all suppliers to report their level of compliance to this Supplier Code of Conduct and the corrective actions being taken towards improvement.
- g. Maintain an internal system to record and monitor the level of compliance to this Supplier Code of Conduct.

- h. Actively engage with all suppliers to support continuous improvement towards compliance with this Supplier Code of Conduct.
- i. Annually communicate the progress towards compliance with this Supplier Code of Conduct to our employers, suppliers and public.
- j. Review the Supplier Code of Conduct on an annual basis and whenever necessary and appropriate.

## C. [X Hotel] requires its suppliers to advise and keep us updated on all suppliers used for the production and processing of our hotel goods and services and, further, to commit to:

- a. Communicate the Supplier Code of Conduct to all employees, suppliers, sub-contractors, home workers, and temporary and contract staff engaged in their supply chain.
- b. Ensure this Supplier Code of Conduct complies with all applicable laws in the countries in which they operate and all relevant ILO conventions, UN Guiding Principles on Business and Human Rights and the UK Bribery Act. Where standards differ, the standard which offers the greater degree of protection to workers shall apply.
- c. Establish management systems for delivering compliance with this Supplier Code of Conduct.
- d. Maintain records demonstrating compliance. An individual in a senior management position should be given responsibility for compliance with the Supplier Code of Conduct.
- e. Train relevant staff on social, ethical, environmental and human rights standards to support compliance with this Supplier Code of Conduct.
- f. Allow hotel representatives access to documentation, management and workers to determine progress against compliance with this Supplier Code of Conduct.
- g. Report any serious breaches of this Supplier Code of Conduct to the relevant hotel representative.

In addition, suppliers may be required to comply with additional sub-policies or standards relevant to the products that we source from that supplier and specific risks or issues associated.