

## I. SCOPE

The Human Rights Policy applies to Hilton's corporate offices and Hilton-owned, leased and managed hotels. Hilton expects its suppliers and business partners to comply with all laws and regulations, and is committed to working with and encouraging its owners, franchise partners, and others in its value chain to uphold this Policy's principles in their own operations and business relationships. Hilton's Responsible Sourcing Policy is aligned with the expectations and commitments of this Policy.

## 2. COMMITMENT

Human rights are the basic rights and freedoms inherent to all human beings. Hilton is committed to complying with the law in every country and region in which we operate. Where national law and international human rights standards differ, or are in conflict, Hilton shall respect the law of the land, while seeking ways to advance international human rights consistent with this Policy.

As a signatory to the United Nations (UN) Global Compact, Hilton endeavors to conduct business operations in a manner that respects human rights, as defined in the Universal Declaration of Human Rights and to avoid complicity in human rights abuses. Prohibited conduct under this policy includes, but is not limited to, the following:

- Using forced or slave labor, including prison, bonded, or debt labor. This prohibition includes transporting, receiving, trafficking, harboring, recruiting or transferring, of persons by means of threat, force, coercion, abduction, or fraud.
- Requiring Team Members\* and temporary employees to pay for their employment.
- Employing individuals who are under 15 years of age or the lawful age of employment (whichever is higher).
- Failing to comply with applicable laws and regulations regarding compensation, hours of work, overtime and benefits.
- Failure to respect Team Members'\* right to freedom of peaceful assembly and association, including their right not to be compelled to belong to an association and their right to choose whether or not to be represented for collective bargaining purposes.
- Failure to respect the right of freedom of opinion and expression, including the freedom to hold opinions without interference provided, however, that the exercise of such rights does not interfere with the safe and efficient performance of work by persons on working time.
- Failure to respect Team Members'\* and guests' privacy rights. Hilton is committed to safeguarding information gathered for legitimate business purposes in a reasonable manner and in accordance with laws.

**Harassment & Non-Discrimination.** Hilton values diverse people, talent and ideas. We do not tolerate any form of harassment or discrimination based on any personal characteristic, including race, color, gender, religion or nationality.

**Safe & Healthy Work Environment.** Hilton is committed to the health and safety of our Team Members\*, our guests, and business colleagues. Each Team Member\* and business partner is responsible for understanding and complying with all applicable safety and health laws and guidelines. In addition, each Team Member is responsible for identifying and responding to health and safety hazards and security concerns.

**Prohibition Against Human Trafficking, including Sexual Exploitation.** Hilton condemns all forms of slavery, forced labor, human trafficking and commercial exploitation. As signatories of the ECPAT Tourism Child-Protection Code of Conduct, Hilton is fully committed, in each and every one of the markets in which we operate, to protecting individuals from all forms of abuse and exploitation.

Hilton expects Team Members\* as well as business partners to help us meet this commitment.

### 3. ADDRESSING HUMAN RIGHTS IMPACTS

Hilton addresses human rights impacts in the following ways:

- Hilton requires all Team Members\* to take training on our Code of Conduct, which includes a commitment to human rights as set out in this Policy.
- Hilton strives to conduct human rights due diligence to determine actual and potential human rights impacts in our value chain, and seeks to mitigate these impacts through reasonable measures.
- Hilton seeks to continually strengthen its due diligence processes by tracking and integrating findings back into its policies and procedures.
- Hilton communicates with its stakeholders both internally and externally regarding how it addresses impacts and publishes progress in its annual corporate responsibility report.
- Hilton seeks to establish and strengthen mechanisms to report and investigate known or suspected human rights violations.

### 4. GOVERNANCE

Hilton operates at a global scale, with a complex supply chain. For the latest figures of the company's structure, please refer to [www.ir.hilton.com](http://www.ir.hilton.com)

For the latest updates on risk mapping and actions taken, please refer to Hilton's annual corporate responsibility report: [www.cr.hilton.com](http://www.cr.hilton.com)

This statement should be read in conjunction with all relevant Hilton policies and guidance, including but not limited to the following ones:

- Code of Conduct
- Responsible Sourcing Policy

This policy statement has been developed by Hilton in consultation with external stakeholders, including government, non- governmental organizations, industry bodies, academia and key business partners.

\*Team Members include employees of Hilton at corporate offices, owned, managed, leased and timeshare properties. Franchise employees include employees at independently owned and operated franchised properties. While franchisees and their employees are not employed by Hilton, they are a large part of Hilton's brands and culture of hospitality.

Hilton reserves the right to amend or modify this Human Rights Policy. Last updated December 2017.

