

July 21, 2023

Hilton is committed to promoting and protecting human rights across our operations, development pipeline and supply chain and is committed to operating with accountability and transparency, especially as it pertains to our employment and resourcing practices.

As shared previously in [Hilton's response to the Business Human Rights Resource Centre \(BHRRC\) Gulf Hotels Survey](#), provided to BHRRC on July 12, 2022, [Hilton's Code of Conduct](#), [Human Rights Principles](#) and [Responsible Sourcing Policy](#) state our opposition to any forms of modern slavery and forced labor. As stated in response to BHRRC's related July 7, 2023 inquiry, all Hilton Team Members, including temporary workers, are subject to and protected by these policies.

In 2022, we engaged approximately 10 recruitment agencies headquartered in Nepal, the Philippines, UAE, Ukraine, Kyrgyzstan, Lebanon and Macedonia to recruit temporary workers from Nepal, the Philippines, Morocco, Lebanon, Zimbabwe and Eastern Europe for our managed properties in Qatar.

Hilton's processes around the selection of business partners, including both hotel owners and suppliers, includes consideration of treatment of temporary workers. During our initial engagement with prospective suppliers, we require them to review our Code of Conduct, Human Rights Policy and Responsible Sourcing Policy and make representations regarding their reputational and legal history related to human rights while providing sufficient information to allow for vetting.

Our regular vetting process consists of due diligence conducted with the assistance of third-party experts, including consideration of human rights and modern slavery issues such as recruitment fees, wages, working/living conditions and health and safety. The nature and scope of such due diligence is adjusted depending on the particular risks of the jurisdictions at issue and other key factors.

The due diligence processes described apply equally to recruitment agencies. Recruitment agencies are required to implement the standards described in Hilton's Responsible Sourcing Policy (as incorporated into all contracts) and are expected to monitor against those standards during the life of our business relationships. No recruitment agency can be approved for a business relationship with Hilton absent these steps and considerations.

Specific to recruitment fees, Hilton takes proactive steps to prevent recruitment agents from charging recruitment fees. For each temporary worker that we hire from a recruitment agency, we pay that recruitment agency a fee for having sourced, interviewed, and presented that candidate to us. Hilton may also pay the recruitment agency fees associated with medical costs, government fees, and visa processing fees for temporary workers that Hilton hires from the recruitment agency. We also include terms in our contracts that preclude recruitment agencies from charging recruitment fees.

As part of Hilton's due diligence, we have developed a process whereby we interview candidates who are hired to ensure that no recruitment agencies required them to pay any fees to obtain the position for which they were hired. We ask these employees the same question during their interview process and during their onboarding process. Leading up to the 2022 World Cup, Hilton worked closely with the Qatari Supreme Committee for Delivery & Legacy (SC) to determine the appropriate partners for 2022 World Cup events in compliance with local laws.

For commercial purposes and the privacy of our team members, Hilton does not publicly disclose its partners or resulting fees paid as part of Hilton's due diligence process. Hilton reserves the right to review its business partners' practices through third-party audits. Hilton investigates any allegation that a business partner has violated Hilton's standards; an adverse finding may lead to action, including using our leverage to require the business partner to change its practices.

For more information on Hilton's governance efforts, please refer to Hilton's annual environmental, social and governance report at [esg.hilton.com](https://www.hilton.com/esg).