

# Radisson Hotel Group Slavery and Human Trafficking Statement 2024

Our aim is to combat and eliminate any form of modern slavery and to operate hotels free of any child exploitation as well as any kind of forced, bonded, or compulsory labor. We apply these principles to our operations and in our supply chain. This is our 8th Slavery and Human Trafficking Statement.

Previous Slavery and Human Trafficking Statements can be found [here](#).

## ORGANIZATIONAL STRUCTURE, OUR BUSINESS AND SUPPLY CHAINS

### ABOUT RADISSON HOTEL GROUP

Radisson Hotel Group (RHG/Radisson) is a leading international hotel group with 10 distinctive hotel brands and more than 1,340 hotels in operation and under development in +95 countries. RHG is rapidly expanding with a plan to significantly grow the portfolio. Radisson's overarching brand promise is Every Moment Matters with a signature 'Yes I Can!' service ethos.

The Radisson family of brands portfolio includes Radisson Collection, art'otel, Radisson Blu, Radisson, Radisson RED, Radisson Individuals, Park Plaza, Park Inn by Radisson, Country Inn & Suites by Radisson, and prizeotel brought together under one commercial umbrella brand Radisson Hotels.

Radisson Rewards is Radisson's loyalty program, which delivers an elevated experience that makes 'Every Moment Matter'. As the most streamlined program in the sector, members enjoy exceptional advantages and can access their benefits from day one across a wide range of hotels in Europe, Middle East, Africa, and Asia Pacific.

More than 70,000 team members work at RHG and at the hotels licensed to operate in its systems. RHG is directly involved in the operation of leased and managed hotels, while franchise owners and their managers have control over the operations of the franchised hotels. This statement applies to RHG hotels in Asia Pacific, Europe, the Middle East, and Africa. RHG is headquartered in Brussels, Belgium.

### GOVERNANCE AND RECOGNITION

At RHG, we believe that people are at the core of everything we stand for. RHG's vision is to become the brand of choice for guests, owners, and talent. Our people-centric culture plays an important role in our business transformation and our business success. RHG

acknowledges the United Nations Guiding Principles on Business and Human Rights, which are embedded in our policies and procedures. They are consistent with our core beliefs and commitment to be an ethical business.

RHG endeavors to conduct its business operations in a manner that seeks to promote and enhance human rights within its sphere of influence. RHG is committed to raising awareness and mitigating human rights risks in its own operations as well as risks arising in the wider labor supply chain. This commitment is aligned with, and supported by, our Code of Business Ethics ("the Code") and the principles of the United Nations Global Compact. RHG has been a signatory to the Global Compact since 2009.

RHG aims to bring positive benefits to the communities in which its hotels and offices operate, through high-quality services, economic growth, employment opportunities, environmental protection initiatives, and community involvement. Our commitment to ethical excellence is our heartbeat, and we are recognized as a trusted global leader and a world leading responsible business.

### EMPLOYMENT AND EMPLOYABILITY

In 2023, RHG accounts for 146 nationalities amongst its team members. Women comprise 33% of its team members, 66% are men, and 1% chose not to select a gender. 2% of team members have a disability. 81% team members have a full time or part time contract, while the remaining 19% have a contract without a fixed number of hours. Of our total workforce, 19% is outsourced labor, mainly for housekeeping, security, food & beverage, and gardening services.

### WORKPLACE COOPERATION

Collective bargaining agreements cover 36% of our team members. Of the hotels operating in countries where this is not possible, 88% of hotels practice other forms of workplace cooperation. This allows management and team members to consult with each other to improve team members' welfare and develop mutually acceptable solutions for common challenges.

### COMMITMENT TO COMBAT MODERN SLAVERY

RHG is committed to combatting modern slavery and human trafficking, educating team members on the slavery and trafficking issues, and encouraging its partners, stakeholders, and the broader business community to take a stand against slavery and human trafficking.

We operate to very high standards and advocate socially and environmentally sustainable business practices. Our aim is to identify and address vulnerabilities in the hospitality industry, combat and eliminate any form of modern slavery, and to operate our business without modern slavery, sexual exploitation, exploitation of children, as well as without child labor, servitude, or any forced, debt bonded, or compulsory labor.

RHG strives to ensure that:

- Every team member has a worker contract
- No team member is forced to work
- No team member is forced to handover government-issued identification, passports, work permits, or bank cards to a third party
- No team member is required to pay any fees in exchange for work
- No excessive deductions are made from any team member's wages

These expectations are also applied and included in the practices of schools, labor agencies, and outsourced labor suppliers which RHG utilizes.

### TEAM INVOLVEMENT

Team members from different countries across the organization are involved in our anti-slavery and anti-trafficking initiatives. Strategy development and follow-ups are coordinated by the corporate responsible business department and corporate human resources team, working closely with the procurement team, both centrally and in the various geographical areas in Asia Pacific, Europe, the Middle East, and Africa.

### STRUCTURE OF OUR SUPPLY CHAIN

RHG actively advocates for supply chain sustainability. RHG carefully selects suppliers who offer purchased goods or services. RHG's supply chain consists of suppliers who provide goods and services to leased, managed, and franchised hotels. Our supply chain has three types of supplier categories: local, regional, and corporate. Corporate and regional suppliers are managed by our corporate procurement team via centralized and regional procurement agreements. These suppliers provide a variety of products and services, including staffing, operational supplies, equipment, furniture, fixtures, food, drinks, amenities, linen, and cleaning supplies. Local suppliers are managed at the individual hotel level.

## POLICIES AND PRINCIPLES

### CODE OF BUSINESS ETHICS

The Code enables all RHG team members to take positions and act on key issues of business ethics with a single voice. It is a commitment to do what is right as well as to demonstrate and live our values, rules of conduct, behavior, and principles of action. The Code applies to all hotels owned, leased, and managed by RHG, as well as the director officers, team members, agents of RHG, its subsidiaries, and associated companies. The Code is distributed to all team members.

It's paramount that all team members know and understand the Code, act consistently with the Code and, if in doubt, seek guidance from their team manager, human resources manager, or the legal department. Management teams must be a role model, lead by example, and maintain, promote, and act in accordance with the Code in all daily operations.

All team members are trained in the Code, its implications, and reporting processes. The training, which is part of the immersion and induction program for new starters at RHG, is mandatory for all team members and includes a reference to the RHG's ethics platform. The latest version of the Code is aligned globally and incorporates recent legislative needs and changes.

### HUMAN RIGHTS POLICY AND COMMITMENTS

RHG is committed to maintaining a high standard of business ethics, honesty, and integrity. The key human rights and employment principles are grouped into three documents.

Our Human Rights Policy and Human Rights Commitments cover RHG's engagement on issues such as ethical business conduct, protection of children's rights, combating modern slavery and human trafficking, protection of migrant workers, and protection of team member rights.

Our Employment Principles cover RHG's commitments to its team members such as non-discrimination, freedom of association, team member well-being, positive working environment, and internal development of talent.

These policy documents are publicly available, compliment the Code, and clarify the principles we live and work by in our hotels and offices.

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## SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct contains obligations for suppliers and sub-suppliers and the broader business community. It requires them to take a stand against modern slavery and human trafficking. The Supplier Code of Conduct supplements the Code. Its principles represent the minimum social and environmental sustainability standards that RHG expects its suppliers to achieve.

The Supplier Code of Conduct prohibits the use of any form of modern slavery, human trafficking, exploitation of children or forced or compulsory labor. All work must be voluntary, and in no case should workers be mandated to relinquish government-issued identification, passports, visas, or work permits. Suppliers and sub-suppliers must ensure that the Employer Pays Principle is applied and that workers are not required to pay any recruitment fees or expenses as a condition of receiving work.

The Supplier Code of Conduct has been seamlessly integrated into the supplier agreements and must be signed by all suppliers at the corporate and regional levels. The Supplier Code of Conduct is included in the digital repository module for contract management in the procurement system. This process is monitored by the corporate procurement team.

Local hotel suppliers are required to follow the RHG Supplier Code of Conduct. However, we do not actively register which suppliers have signed at the local level.

## RESPONSIBLE BUSINESS POLICY

The Responsible Business and Environmental Policy covers compliance with all applicable legislation regarding labor, health and safety, human rights, and the environment. It requires our hotels and offices to operate free of slavery, exploitation of people, or forced, bonded, or compulsory labor. The policy strives to follow best practices in each of these areas.

## DUE DILIGENCE PROCESSES

### AUDITS

Every hotel undergoes an internal audit every second year. Elements of the audit include control of background checks for all positions that handle cash as a part of their role, or other sensitive positions. The background check must be done by an external company. Other verified checks include supplier contract approval, work permits for team members from outsourced companies, reference checks on other partners of suppliers, and background checks on outsourced team members in accounting & finance, human resources, security, IT, front office, and food & beverage. An outsourced company cannot sub-contract any activities delivered to the hotel without written approval from RHG. In 2023, 47% of our managed and leased hotels in EMEA were audited.

### RESPONSIBLE RECRUITMENT AND EMPLOYMENT

Hotels aim to apply responsible recruitment and employment practices when recruiting and employing outsourced team members. 71% of hotels undertake background checks on recruitment agencies. To mitigate the risk of modern slavery and human trafficking, RHG uses the responsible recruitment and employment framework. The framework includes the use of a toolkit which supports our recruitment practices.

### TOOLKIT FOR RESPONSIBLE RECRUITMENT AND EMPLOYMENT

The toolkit for responsible recruitment and employment provides guidance on how to prevent modern slavery and promote ethical recruitment practices as well as details of how to engage with recruits and team members using worker interviews, how to increase awareness of modern slavery amongst team members, how to approach a recruitment agency, and what due diligence must be completed.

The toolkit also supports hotel management teams in their efforts to prevent modern slavery, especially concerning outsourced labor. The toolkit has been rolled out on our digital platform to all geographic areas in Asia Pacific, Europe, the Middle East, and Africa. In 2023, 69% of our hotels actively used the toolkit. The Leading Responsible Business training for all heads of departments and general managers includes a specific training module on how to use the toolkit. The toolkit for responsible recruitment and employment has been reviewed by the United Nations International Organization of Migration and recommendations were implemented in 2022.

## SELF-ASSESSMENT QUESTIONNAIRE

The toolkit includes a hotel self-assessment questionnaire (SAQ). RHG has created this assessment tool in association with the specialized human rights consultancy Verité. The SAQ allows our hotels to identify potential gaps and vulnerabilities in the recruitment process. The SAQ is designed to gather information on risks of forced labor and human trafficking that hotels may be facing, and ultimately to help hotels and its third-party intermediaries to detect, remediate, and mitigate risks of labor abuse. It assesses the risk of forced labor or human trafficking in the business processes of third-party intermediaries which provide services related to the recruitment, selection, hiring, transportation, training, and management of migrant workers.

### MIGRANT WORKER INTERVIEWS

The toolkit also includes a migrant worker interview template. This document provides a set of interview questions to use when conducting targeted migrant and foreign contract worker interviews. This tool is used to guide the hotel and help identify possible cases of abuse or recruiter-induced human trafficking.

### REMEDIATION PLAN

Additionally, the toolkit includes guidance on how to implement a remediation plan for human rights risks and abuses that may be identified during the course of these assessments. It provides the team with guidance on what actions to take when certain risks are identified, and when cases of forced labor are uncovered or reported during assessments.

### ETHICS PLATFORM

A cornerstone of the Code implementation is ethics.radissonhotels.com, a platform run by an independently operated third-party organization. Team members can use this site to report concerns anonymously. Any team member with concerns or questions about the Code is encouraged to raise these directly with their supervisor or person of trust in the hotel or regional organization. If this is not possible, the team member can report the issue online. The Ethics Leadership Group will investigate any specific report in an independent role. The site is available in 11 languages and can be utilized by all team members, outsourced team members, and agency workers. Of the 41 reports made in in 2023, none involved allegations concerning modern slavery and human trafficking.

## SUPPLY CHAIN DUE DILIGENCE

### SUPPLY CHAIN VISIBILITY

For RHG to understand and control the business risk to our supply chain, we use a range of tools to increase supplier and supply chain visibility, from first contact with a supplier to ongoing annual reviews.

RHG has an overarching accountability for the standards of its supply chain, the treatment of team members, and the safety of guests. The products, services, and activities of RHG's suppliers may impact its reputation and affect its level of trust with other stakeholders. It is imperative that RHG's suppliers follow the Supplier Code of Conduct and request the same from their supply chain, including third-party labor agencies.

In addition to compliance with the supplier agreement, we expect our suppliers to comply with the laws and regulations which apply in the countries and jurisdictions where they conduct business or deliver goods and/or services. All current corporate suppliers recognize RHG's Supplier Code of Conduct.

### TENDERING PROCESS

The first engagement process a supplier goes through is the Request for Information (RFI) tendering process. This allows RHG to evaluate new and potential suppliers during the first phase of the tender process. The RFI contains multiple criteria, including a set of knock out criteria, allowing RHG to evaluate the supplier's financial, environmental, labor, and human rights status before signing a contract. We request all suppliers to register into EcoVadis or a similar supply chain assessment solution and provide reasonable evidence of compliance with RHG's Supplier Code of Conduct on request. The provided supplier information is assessed and non-compliance is discussed with the individual supplier accordingly.

### SUPPLIER CONTRACT

RHG is committed to advancing the United Nations Global Compact's ten universally accepted principles as well as the United Nations Sustainable Development Goals. This is reflected in the Supplier Code of Conduct which is integrated in RHG's standard supplier contract. The contract also refers to obligations for suppliers, sub-suppliers, and the broader business community, including a clause against modern slavery and human trafficking.



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## RISK MAPPING ANALYSIS

RHG uses a risk mapping analysis as part of its supplier due diligence to enable the Radisson to understand supplier performance. Input from the hospitality risk-rating tool was used for the analysis. The industry risk rating tool created by RHG and other members of the Sustainable Hospitality Alliance allows hotels to obtain a more complete overview of each supplier risk profile. The rating weighs various criteria including geographic risk, industry, spend, volume, workforce risk, resources, impact, and likelihood of success. The framework allows RHG to prioritize its focus and to address low-level involvement of risk management with suppliers.

RHG partners with EcoVadis to assess RHG's corporate and regional suppliers on environmental, social, ethical, and sustainable supply criteria, and to foster a continuous improvement process. The criteria are based on international sustainability standards such as the Global Compact Principles, the International Labor Organization conventions, the Global Reporting Initiative standard, the ISO 26000 standard, and the Coalition for Environmentally Responsible Economies principles. In 2023, 40% of global suppliers were assessed or in the process of being assessed by EcoVadis. The average labor and human rights performance of all suppliers reviewed is 58.5%, above the average ethics performance which is 53.1%.

## VIOLATIONS OF OUR SUPPLIER CODE OF CONDUCT

Suppliers are expected to comply with the standards of the Supplier Code of Conduct and with all applicable laws and regulations. In cases where modern slavery, human trafficking, exploitation of children, or forced and compulsory labor are discovered in the supply chain, they must be reported to RHG without delay. A specific email address is provided for this purpose. RHG encourages any stakeholder with concerns about the Supplier Code of Conduct and its implementation to discuss this directly with the supplier.

If RHG receives such a report, the supplier is requested to comment and if required, RHG may request the supplier to implement an improvement plan to correct the issue. If the supplier does not act or respond to the report or concern and is not willing to work on correcting the issue, they can be subjected to disciplinary action. This can include termination as a supplier, and/or review by local authorities.

Best practice suggests we try to work with the supplier to improve their practices rather than terminating their contract. Suppliers are requested to notify their employees and any sub-contractors who work for RHG, that they may report serious or sensitive concerns, or possible breaches of the Supplier Code of Conduct.

## TRAINING

### RESPONSIBLE BUSINESS TRAINING

We endeavor to educate and enable our team members to make conscious decisions in favor of environmental, ethical, and social issues every day, both in their private and professional lives. RHG's award-winning Responsible Business training program equips team members in its hotels and offices with expertise and skills on an array of topics, including a special emphasis on the roles which hotels play in tackling modern day exploitation. We train all our team members to recognize the risks of modern slavery, sexual exploitation, and human trafficking in our operations and the supply chain. We explain the benefits of strong measures to tackle slavery and human trafficking, as well as the consequences of failing to combat these problems. Training compliance is measured on an ongoing basis.

### COMBATTING MODERN SLAVERY TRAINING

As part of the responsible recruitment toolkit, a specific training module is used to increase awareness of modern slavery. It provides guidance on due diligence processes. The training includes information on responsible practices and the use of the toolkit by Area and Hotel human resource teams and recruiters.

Additionally, RHG offers an online e-learning focused on risks in the labor supply chain. The 'Risks of modern slavery in labor sourcing' training, made available through the membership network of the Sustainable Hospitality Alliance, is designed to support human resources, procurement, and legal teams to identify and address the risks of modern slavery in hotel operations and the supply chain. The training also includes real-life case studies to underpin the learnings.

## INDUSTRY PARTNERSHIPS

### SUSTAINABLE HOSPITALITY ALLIANCE

The hospitality industry can be a force for good and make a positive contribution to tackle modern slavery and human trafficking. RHG is a "hospitality donor" member of the Sustainable Hospitality Alliance and works together with them to address challenges, share expertise, and develop practical solutions to enable the whole industry to operate responsibly and grow sustainably.

As part of the Sustainable Hospitality Alliance, we collectively work to raise awareness of human rights risks, embed human rights into corporate governance, and address risks arising in the labor supply chain and during construction. RHG is committed to the industry's Principles on Forced Labor which addresses human rights risks in the labor supply chain. These state that every worker shall have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work. RHG participates in the Human Rights working group as an active member.

### CHILD PROTECTION AND ANTI-TRAFFICKING

Protecting victims of human trafficking is imperative to RHG. Through our partnership with ECPAT and as a signatory of the Tourism Child Protection Code of Conduct, we have taken a public stand and continue to work to prevent human trafficking, sexual exploitation, and the exploitation of women and children. We ensure all team members are trained in our human trafficking module. This module is part of our mandatory, classroom based, Living Responsible Business training. The module includes various case-based scenarios to train team members to identify suspicious behavior and how to report forced sexual exploitation to police. It encourages discussion amongst participants on what actions to take.

## FUTURE STEPS

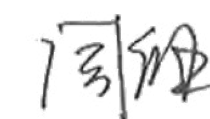
The risks of modern slavery and human trafficking in our operations and our supply chain need our constant attention. Because of the significant growth of our operations, we must monitor, manage, and mitigate risk in our operations and our supply chain continuously. We will continue to fight modern slavery and human trafficking to minimize and manage risks and develop better ways to increase the visibility of our actions in our operations and supply chain.

Over the coming year we plan to:

- Continue the refresher training for hotel teams on how best to use the toolkit for responsible recruitment and employment.
- Continue supplier engagement, evaluations, and risk mapping analysis for all suppliers of outsourced labor, all corporate suppliers, and all high-risk and high-volume regional suppliers to ensure they comply with our Responsible Business, Human Rights, and Preventing Modern Slavery policies.
- Continue our cooperation with other hospitality industry partners via the Sustainable Hospitality Alliance network and the human rights working group to identify and share best practices and participate in projects.
- Continue to review existing manuals, contracts, standards of operation, and audits to strengthen our aim to combat and eliminate any form of modern slavery.

## SIGNED BY THE BOARD

This annual statement for the full financial year 2023 was approved by the Board of Directors of Radisson Hotel Group.



**Zhou Wei**  
Chairperson