

## THE WAY WE WORK AT

### PREMIER INN







BUSINESS PRACTICES AND STANDARDS OF BEHAVIOUR

Middle East Version 2023

Premier Inn Code of Conduct 2023

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#### **FOREWORD**

## DOING THE RIGHT THING FOR OUR SHAREHOLDERS, EMPLOYEES AND GUESTS



Simon Leigh Managing Director

At Premier Inn MENA, we are proud to build our business on three key pillars: trade brilliantly, invest in our business and profitable growth. By applying these pillars in everything we do, we can realise our vision of being the Middle East's hotel brand renowned for high value and high quality, expand our footprint in our existing locations and new markets, and be recognised as the employer of choice in the region's ever-growing hospitality sector.

It's our people who make Premier Inn great. Our team members are pivotal to our vision, which is why we are committed to investing in our people and, in turn, our business, through training and development, enhanced benefits and remuneration, and employee wellbeing schemes.

Every day, our teams do a fantastic job delivering brilliant customer service to thousands of customers in the Middle East. Their incredible passion, and our business philosophy, is captured in our One Team, One Heartbeat focus which, together with our values, forms the bedrock of our business.

As with any company, our reputation is built on trust; the trust of our customers, our people, our partners and suppliers, our investors and the communities we serve. Trust is hard to win, but easy to lose. Creating a culture where people trust, respect and look out for each other requires everyone to work and behave to the highest standards. Our business conduct is very important to me.

Doing the right thing is sometimes obvious and sometimes it's not. This statement of our business practices and standards of behaviour is designed to help give you guidance to deal with situations when it's not always obvious what is the right thing to do. It explains what to do if you spot something that you feel is unethical, dishonest or unacceptable, and could be putting other people or our business at risk. We cannot describe every situation you may come across but it's important you fully understand our values, business practices and standards of behaviour so that you can apply them to any situation. Everyone who works at Premier Inn MENA has a part to play in upholding our values and protecting our brand and reputation. I urge you to speak out if you see or hear of anything which doesn't follow or meet our high standards. If you are in any doubt, please ask your line manager or approach the HR team. Rest assured, your concern will be treated in complete confidence.

By following these practices and standards, we will continue to do business in the right way, ensuring we are always ethical and transparent in our approach, with a fair and open culture to build an even better business.

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#### OUR **GUESTS**

#### WE HAVE A BRILLIANT BUSINESS, THAT OUR GUESTS LOVE!

Our winning teams delight guests so they come back time and again which, along with our focus on everyday efficiency, drives profitable growth.

We are passionate about being a Force For Good in our business, communities, and the wider environment, helping everyone to live and work well.



We will achieve even greater things and continue to delight our guests by all working as one team. #OTOH



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## ABOUT OUR BUSINESS PRACTICES AND STANDARDS OF BEHAVIOUR

It's not always obvious what's right or what's legal in any given situation. This guidance provides an overview of some of the standards each team member is expected to respect every day.

If you want to be sure that what you're doing or planning to do is appropriate, then use this document and our supporting policies to guide you.

You can find our supporting policies on the 'People Policies' page on the intranet. They give you more detail in various areas, ranging from human rights and diversity, to data privacy and information security.

It is each and every team member's responsibility to follow these business practices and standards of behaviour so it is very important to understand what is expected of you.

If in doubt, talk to your line manager, or another person responsible for your area, or refer to the Speaking Out Policy straight away.

If you are a line manager, it is your responsibility to make sure your team understands our business practices and standards of behaviour set out in this guidance and supporting policies and how to apply them in practice.

### IF YOU'RE NOT SURE ABOUT SOMETHING, ASK YOURSELF THESE KEY QUESTIONS BEFORE YOU ACT:



Is the approach consistent with our values, standards and any applicable law or regulation? You can deliver great customer experiences and conduct business with integrity knowing that Premier Inn supports you in doing the right thing.



Could your approach compromise you or Premier Inn?

You play a critical role in protecting our values, our brands and our reputation and in ensuring that Premier Inn has a great work environment.



How would your approach look if published in the newspaper or online?

If you are unsure of what to do in a situation, you have guidance available to you including our Business Practices and Standards of Behaviour.



Would you be comfortable with the example it sets for future decisions?

When you believe something isn't right, it probably isn't. Please speak up and share your genuine concerns, knowing that Premier Inn wants to hear them.

#### **SPEAKING OUT**

IF SOMEONE IS BEHAVING IN A
WAY THAT'S NOT IN LINE WITH
OUR BUSINESS PRACTICES OR
STANDARDS OF BEHAVIOUR OR
IN A WAY THAT'S HARMFUL TO
OUR TEAM MEMBERS,
CUSTOMERS, OR PREMIER INN'S
REPUTATION, WE'D LIKE TO KNOW
ABOUT IT.

YOUR CONCERNS WILL BE TAKEN SERIOUSLY AND DEALT WITH IN A FAIR AND BALANCED WAY. Open communication with your line manager is critical to ensure a successful working relationship and so the best way to deal with most issues or concerns is to talk to your line manager, or another person responsible for your area. Any genuine issues, or concerns raised in good faith, will be taken seriously and will always be investigated.

If you feel uncomfortable talking to your line manager. You can scan the QR code below which will take you through our speaking out policy where you can submit your concerns confidentially online.

You don't have to leave your name, but you will be encouraged to do so if it will help to resolve the problem





# OUR PEOPLE EQUAL OPPORTUNITIES RESPECT IN THE WORKPLACE **DEVELOPING** OUR PEOPLE PROTECTING HUMAN RIGHTS STAYING SAFE AT WORK LISTENING TO YOUR VIEWS

#### **HUMAN RIGHTS**

#### **OUR PRINCIPLE:**

EVERYONE DESERVES THE RIGHT TO LIVE AND WORK WITH DIGNITY. IN LINE WITH THE UNGPS (UN GUIDING PRINCIPLES FOR BUSINESS AND HUMAN RIGHTS), WE ARE COMMITTED TO RESPECTING HUMAN RIGHTS ACROSS OUR BUSINESS.

#### WHAT DO WE MEAN?

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.

Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

We recognise our responsibility to respect the human rights of people within our own operations, and we expect our business partners to respect these rights too. These expectations are made clear to them at the start of any business relationship, and are monitored and measured on an ongoing basis.

If you have any concerns, please speak to HR or report it to your line manager, or refer to the Speaking Out Policy straight away.



Lately, my place of work has been very busy and it has been hard to find time to do routine cleaning. At this morning's meeting, our manager told everyone that if they don't complete their tasks before they finish their shift, they will have to stay on, on an unpaid basis to do so.

Is it okay for our manager to ask this of us?

A

No. This type of behaviour is not acceptable or endorsed by Premier Inn . Premier Inn is committed and legally obligated to ensuring that all team members are paid for the hours they work. Any requests to work "extra hours" must be reported to the senior line manager or another person that has overall responsibility for your area.

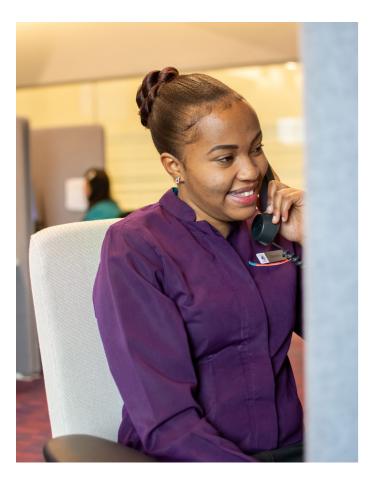
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#### **RESPECT IN THE WORKPLACE**

#### **OUR PRINCIPLE:**

WE TREAT EVERYONE FAIRLY, WITH RESPECT AND KINDNESS.

## WE HAVE ZERO TOLERANCE FOR DISCRIMINATION.



#### WHAT DO WE MEAN?

At Premier Inn, we all have the right to be treated respectfully and with kindness, and have an obligation to create an environment for others where everyone feels this way. This extends to our guests and customers as well as outside contractors and members of the public. This includes how you treat others, and how you react to how others are treated.

Respecting your colleagues, guests and customers means you never:

- Make assumptions about people, based on your own biases, experiences and/or personal views.
- Make jokes or comments that could be offensive or derogatory.
- Bully, harass or victimise anyone, including based on their personal characteristics.
- Use physical or verbal abuse or threats.
- Share any offensive, derogatory or sexually explicit materials by any communication tool including social media. Make sure you read Premier Inn's Social Media policy, as failure to follow it may result in disciplinary action, so it is very important you understand what is expected of you.
- Use any unwelcome behaviour towards a team member or person doing business with Premier Inn.

If you believe that you or your colleagues aren't being treated with respect and kindness, talk to your line manager or another person responsible for your area in the first instance Premier Inn's Grievance policy also sets out positive steps to take to resolve the situation. You can also refer to the Speaking Out Policy straight away.

We must all treat every team member, customer, supplier and anyone else we work with, with **respect.** 



I heard someone in my team say to another colleague that they don't want to work with a colleague who has a different religious belief. I disagree.

What should I do?



Every individual has a responsibility to speak out when they witness something that is inappropriate, regardless of whether it was aimed at you. Firstly, speak to the person, explain how it made you feel and why you think it is inappropriate. If you feel that the issue hasn't been resolved, escalate it to your line manager.

(J)

A colleague made a joke about how they are attracted to me, and went to touch me inappropriately.

1

We take any instances of sexual harassment really seriously at Premier Inn.

You should raise this with your line manager immediately so that they can offer you the appropriate wellbeing support and discuss what next steps they will take to investigate the incident.

Q

My manager told me I should straighten my hair as it would look 'neater'. I am African, and this really offended me.

Δ

We have zero tolerance for any type of racism, as this incident is about your line manager, please speak to their line manager in the first instance.

Q

I have a long term health condition and was ill last week. One of my team messaged on a work-related social media platform sharing a screenshot of me from Facebook while I was absent, saying I didn't 'look' unwell.

A

You should raise this incident with your line manager to investigate further. We strive to educate everyone on unconscious biases such as making judgements about hidden disabilities and illnesses.

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#### **EQUAL** OPPORTUNITIES

#### **OUR PRINCIPLE:**

WE BELIEVE IN EQUAL
OPPORTUNITIES FOR ALL,
WITH NO BARRIERS TO ENTRY
AND NO LIMITS TO AMBITION.

#### WHAT DO WE MEAN?

At Premier Inn, we all have equal access to opportunities for growth and development, regardless of our personal characteristics or background.

It is important that we don't make assumptions about people, based on our own biases, experiences and/or personal views.

- Opportunities for progression are open to everybody interested, to ensure all team members have an equal chance to compete and develop, and we will always appoint jobs to the best person for the job.
- We do not make decisions based on behalf of the individual, even if the intent is positive. These decisions include, but are not limited to, pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.





I have a vacancy in my team. I've informed all my team except for one team member who is currently on maternity leave.
I assume they wouldn't be interested in progression right now.

Is this ok?



No, this is not ok. All team members have equal rights to access any opportunities to progress, including those employees on maternity leave. The assumption that they wouldn't want to progress would be deemed as discriminatory. Also, if the team member is unlikely to be aware of the opportunity, you should contact them to make them aware.



I am hiring. I think the best candidates have university degrees.

Is it ok to use this as a filter for candidates?



We believe in no barriers to entry and no limits to ambition at Premier Inn. Simply put, greater diversity makes us a better business. In narrowing your talent pool to university graduates, you are narrowing the amount of diverse thinking you will have in your team, and creating barriers for some communities to apply. Whilst some roles might require specific qualifications, we would still encourage our teams to be open minded about different experiences, regardless of where or how they have been gained.



I am about to do half year reviews for my team.
There is someone in my team who works in a really similar way to me, perhaps because they have a similar background. They just get the job a bit better, so their performance rating will be higher than the rest of my team.

Is this ok?



It is important that you are fair and factual in your half year performance ratings. You may be experiencing similarity bias in your current assessment. Instead, think about the factual evidence for each individuals' performance over the six months, in terms of what they have achieved and how they have worked. Discuss your proposed ratings with a trusted peer to make sure you are mitigating your own biases and being fair.

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#### **STAYING SAFE** AT WORK

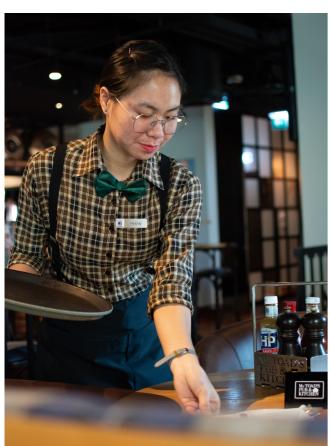
#### **OUR PRINCIPLE:**

WE WILL OPERATE A SAFE
WORKPLACE FOR OUR TEAMS
AND CUSTOMERS. WE GIVE
OUR TEAM MEMBERS THE
TRAINING AND INFORMATION
THEY NEED TO KEEP THEMSELVES,
THEIR COLLEAGUES AND OUR
CUSTOMERS SAFE.

#### WHAT DO WE MEAN?

We must keep everyone safe. We'll give you the safety training and information you need to keep you and your environment safe, but if you're not sure about anything, check with your line manager. As well as our policies and procedures, there are a number of important laws and regulations that affect how we work. If you need more information, ask your line manager or take a look at Premier Inn's Health and Safety policy.

An important part of keeping a safe working environment is working without the influence of alcohol, illegal drugs or other substances that might alter your judgement and abilities. If you're aware of any behaviour like this that might cause a safety or environmental hazard, then you must tell your line manager or or refer to the Speaking Out Policy straight away.





G

I saw a member of the Kitchen team using out of date food, but I didn't feel confident to challenge them or tell my line manager.

What should I do?

4

We hope that you feel comfortable talking about any worries or problems with your line manager or another responsible person at work. However, we realise that speaking out can be difficult.

Our Speaking Out process has been put in place so that we all know what to do if we witness something we believe is wrong, and so that you know you're safe and supported if you decide to speak out.



My line manager has asked me to turn the bed mattress during my shift.

What should I do to stay safe?

4

We take the safety and security of our team members very seriously. To make sure you stay safe during your shift, we have health and safety training conducted regularly.

If you have not had this training, please reach out to your line manager who will provide you with the appropriate support.

If you are ever concerned about health and safety, please speak with your line manager.

If you are asked to do something that is a risk to your health and safety, please refer to the Speaking Out Policy straight away.

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## DEVELOPING OUR PEOPLE

#### **OUR PRINCIPLE:**

WE ARE COMMITTED TO HELPING TEAM MEMBERS ACHIEVE THEIR BEST AND STRIVE TO BUILD WINNING TEAMS.

#### WHAT DO WE MEAN?

All of our decisions about recruitment, hiring, development and promotion should be made on ability, skills, experience, behaviour, performance and potential to do the job. By employing the best people and creating an environment in which they can flourish and develop, we will achieve our business goals including our strong desire to build winning teams.

Your line manager is always there to listen to any suggestions or issues you might have. They'll also hold regular development reviews to talk to you about how you're getting on and how we can help with your personal development.

## LISTENING TO YOUR VIEWS

#### **OUR PRINCIPLE:**

IT'S IMPORTANT THAT OUR TEAM MEMBERS FEEL ENGAGED WITH WHAT THEY'RE DOING AND MOTIVATED TO DO A GREAT JOB.

#### WHAT DO WE MEAN?

We regularly ask for your opinions and feedback. We use what you tell us to create an action plan and make improvements across the company.





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#### **COMPLYING WITH LAWS**

#### **OUR PRINCIPLE:**

WE ALWAYS ACT WITHIN THE LAWS OF THE COUNTRIES WE WORK IN.

#### WHAT DO WE MEAN?

We make sure that our policies and procedures comply with the law of any country in which we work, and we expect you to comply with those policies and procedures and with the law at all times. We don't condone law breaking and we will help the authorities deal with any offenders.





I am a line manager and I have hired a new person who is currently on a visit visa but I have been told they cannot start work until they receive their employment visa.

Is this really necessary?



Yes. No one can start employment unless they have the correct paperwork. If you don't then you could be held personally liable and could result in you or the company being prosecuted with significant fines. Failure to do these things may result in disciplinary action being taken against you, which could result in your dismissal.

#### **OPEN & FAIR COMPETITION**

#### **OUR PRINCIPLE:**

WE BELIEVE IN OPEN AND FAIR COMPETITION AND ONLY SEEK COMPETITIVE ADVANTAGE THROUGH FAIR AND LAWFUL MEANS.

#### WHAT DO WE MEAN?

Competition law is designed to ensure that businesses are competing fairly and are protected from others acting unfairly. It is unlawful for competing businesses to make arrangements amongst themselves that could undermine open and fair competition. For example:

 Setting prices at which competitors will each sell their products or services to customers;

- By agreeing not to compete for each other's customers or agreeing which business will trade in which particular territory; and
- Exchanging commercially sensitive information with competitors such as business plans, future pricing strategy, marketing plans, or supply chain costs.

Arrangements do not have to be in writing to break the law; they can be agreed in a meeting, at a corporate event or during a telephone call. Illegal arrangements can also arise within a specific arrangements where competitiors mutally align their behaviours in light of what others are doing. All team members must take great care when dealing with our competitors, whether as part of your role or socially.

Non-compliance with competition law can have extremely serious consequences for our businesses, including significant financial penalties and legal claims from competitors and customers, as well as the resulting damage to our reputation. Individuals involved in deliberate breaches will face disciplinary action up to and including dismissal, and in some cases possible criminal proceedings leading to imprisonment and fines.



One of our local competitors suggested we agree to set a minimum price for our hotel rooms for an event taking place where we both have hotels.

Is that OK?



No. Agreeing to this sort of activity is anti-competitive which could lead to you and Premier Inn facing fines or even criminal charges. You should report the conversation to your line manager straight away and get them to involve the Premier Inn legal team, who will advise on next steps.

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#### **MARKETING AND ADVERTISING**

#### **OUR PRINCIPLE:**

OUR COMMUNICATIONS WITH
OUR CUSTOMERS OR POTENTIAL
CUSTOMERS MUST BE HONEST,
TRUE AND ACCURATE. WHEN
WE SAY SOMETHING ABOUT
OUR PRODUCTS OR SERVICES
WE MUST BE ABLE TO
SUBSTANTIATE IT.

#### WHAT DO WE MEAN?

It's against the law to mislead customers with our sales or marketing material. Any statement that sells or markets our products and services must be honest, true and accurate and we must be able to substantiate it. Claims we make for our products and services must comply with applicable advertising and marketing laws and regulations.

If you require any further information on compliance with advertising or marketing laws and regulations, please speak to your line manager or to the Marketing



#### **CONFLICTS OF INTEREST**

#### **OUR PRINCIPLE:**

WE SHOULD AVOID OR MANAGE SITUATIONS WHERE OUR PERSONAL INTERESTS COULD CONFLICT WITH THE INTERESTS OF PREMIER INN.

#### WHAT DO WE MEAN?

We want all of our business decisions to be made fairly and objectively. You should always act in Premier Inn's interests, rather than your own, when you're making business decisions.

Conflicts between your interests and Premier Inn's can hurt our business and reputation even when you don't intend to do anything wrong. Ask yourself how your actions and relationships might appear to others. You need to tell your line manager if you think you might have a conflict of interest.

Conflicts of interest could include:

- Activity outside work that might affect your work at Premier Inn:
- Use of Premier Inn's suppliers or contractors for personal use;
- Any financial interests you have in other companies Premier Inn deals with: or
- A situation where you're dealing with someone as part of your work who is also a close friend or a member of your family.

If any of these situations arise, then tell your line manager straight away. Someone else should be given the responsibility for dealing with the matter and making any decision.



My sister is looking for a job and I have a vacancy in my team. She is trained to do this type of work. Is it okay if I hire her?

Q

My partner runs a small printing company, and I'm sure they could make our leaflets for a lot less than the current supplier.

Can I give them the contract?

4

Premier Inn does not wish to place any team members in a difficult situation at work, through any potential conflict of interest that may occur. In this example, your relationship could be seen by others to impact on performance, judgement or decision making.

You should avoid entering into any situation where your personal interests may conflict with those of Premier Inn, such as employing a relative to work in your team.

In this situation, you should review our referral policy for more information.

4

No. Imagine how it would look if people realised you had given the contract to your partner. If your partner plans to bid for Premier Inn work, you must declare your relationship to your line manager straight away. Someone with overall responsibility for this procurement area should be given the responsibility of dealing with this matter and making any decision.

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#### **POLITICAL ACTIVITIES**

#### **OUR PRINCIPLE:**

OUR PRINCIPLE: WE DO NOT PARTICIPATE IN ANY POLITICAL ACTIVITIES BUT WE DO RESPECT THE RIGHT TO HOLD DIFFERENT POLITICAL VIEWS.

#### WHAT DO WE MEAN?

We don't engage in any political activity as a company. This means we don't sponsor any political parties and we don't make any donations to political parties. But we do respect everyone's right to hold different political views. Everyone at Premier Inn has the right to hold whatever political views they want provided they do not express views in the workplace which are in breach of our principles.

It is not appropriate to use any of the company's funds for political activities.





I am keen on participating in local politics.

Is this OK?



Yes, you're allowed to participate in the political process as long as it's voluntary, in your own personal time and it does not create a conflict of interest with your role at work.

#### **GIFTS AND HOSPITALITY**

#### **OUR PRINCIPLE:**

WE MUST ENSURE GIFTS AND HOSPITALITY ARE REASONABLE AND DON'T IMPROPERLY INFLUENCE OUR JUDGEMENT OR DECISION MAKING. IF WE'RE UNSURE ABOUT ACCEPTING ANY GIFT OR HOSPITALITY, WE SAY NO.

#### WHAT DO WE MEAN?

We all deal with customers, suppliers or other parties we do business with regularly. This means that sometimes you might be offered a gift, hospitality or other benefit that could place you or Premier Inn in an awkward position, that is, in a position where what you are being offered might be seen as intended to persuade you to do something you shouldn't. This might be awarding a contract or doing something for the person who makes the offer which you wouldn't otherwise do.

Hospitality includes invitations to social functions, sporting events, meals and entertainment. Any gifts or hospitality should always be customary and reasonable in terms of value, frequency or timing.

Check with you manager before you accept any gift or hospitality and ask yourself the following questions:

- > Is the purpose of the offer or the timing of it, to persuade me to favour the person making the offer?
- > Could it be against the law?
- Does this offer look odd or out of place under the circumstances?
- > Does the offer seem high in value?
- Has this person tried to give me more than one gift recently?
- Would the company or I be embarrassed if the offer became public?

If the answer to any of the above is "Yes", then please don't make or accept the offer. Also, if you're not sure whether it's OK to accept a gift, then talk about it with your line manager. If you are in any doubt at all, it's best to say no.

Many people working directly with customers or guests are offered tips for their services. Receiving tips from customers for doing your job well is fine, but don't ask for tips as these must be completely voluntary. Also be careful not to accept any tip from someone who is offering it in exchange for you or them to break the rules. This would be a bribe.



We have a supplier who has invited several team members to dinners and events. There doesn't seem to be any hidden motives or expectations behind it, other than to build a good working relationship.

What should I do?

4

We don't want to offend but we don't want to give anyone the wrong impression either.

Before you accept any gift or hospitality, please check with your line manager.
If in doubt, politely decline.

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#### **BRIBERY AND CORRUPTION**

#### **OUR PRINCIPLE:**

WE MUST NEVER GIVE OR
ACCEPT A BRIBE OR PARTICIPATE
IN DISHONEST PRACTICES.
IT CAN SERIOUSLY DAMAGE
OUR REPUTATION.

IT IS BETTER TO MISS OUT ON A BUSINESS OPPORTUNITY THAN COMPROMISE OUR INTEGRITY AND HIGH STANDARDS.

#### WHAT DO WE MEAN?

Premier Inn is strongly opposed to all forms of bribery.

A bribe involves the promise of money, a gift or a favour to influence someone's behaviour so they don't perform their role properly. Never give or accept a bribe. Please also make sure that third parties working on our behalf understand that we do not approve of giving or accepting bribes.

Payments or gifts made to public officials to speed up or facilitate actions that offixials are dut to bound to perform are not permitted. Even if such payments are for small amounts, such payments are illegal in most countries and Premier Inn makes no distinction between such payments and bribes.

Likewise, we must not get involved in any dishonest practices including activities such as fraud, deception or collusion.

Any allegation of bribery or dishonest practice can have extremely serious consequences for Premier Inn and its businesses as well as serious damage to our reputation.

Individuals involved in bribery or corrupt practices will face disciplinary action up to and including dismissal, as well as possible criminal proceedings leading to imprisonment and fines.

It is better to miss out on a business opportunity than compromise our integrity and high standards.

4

Yes. However, it's not OK to accept cash or cash equivalent (e.g. vouchers) from someone who then might expect you to favour them or their company.

Q

Is that OK?

I'm being asked for a payment from a public official in order to speed up matters.

A guest is offering me a tip for my services.

What should I do?

4

This is illegal and you should refuse. Please also raise it with your line manager straight away and if you have any doubts or concerns about their response, please contact the Speaking Out helpline.

#### **FRAUD AND THEFT**

#### **OUR PRINCIPLE:**

WE LOOK AFTER PREMIER INN'S PROPERTY AS IF IT WERE OUR OWN, AND WORK TOGETHER TO SAFEGUARD IT TO PREVENT FRAUD OR THEFT.

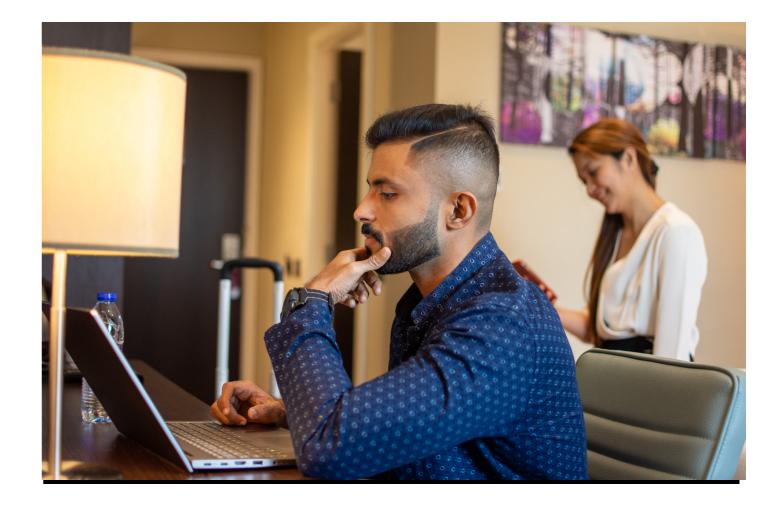
#### WHAT DO WE MEAN?

We all work hard to make Premier Inn successful, so it is important that we work together to safeguard the company's property and assets and prevent fraud or theft.

Premier Inn has comprehensive policies and procedures in place to protect its finances and takes any breaches of those procedures very seriously. This extends beyond taking money from the till, to claiming expenses, the payment of bonuses and the use or giving of vouchers.

Fraud or theft could either be committed by people within Premier Inn or by external organisations or individuals. In all cases it impacts Premier Inn's performance and counteracts the hard work and commitment of everyone else. Premier Inn will refer all matters of suspected fraud to the police.

If you believe that fraud or theft is taking place, it is important that you talk to your line manager or refer to the Speaking Out Policy straight away.



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#### **TAX EVASION**

#### **OUR PRINCIPLE:**

PREMIER INN IS FIRMLY
COMMITTED TO MEETING ALL OF
ITS STATUTORY TAX OBLIGATIONS,
WHEREVER IN THE WORLD
THEY MIGHT ARISE. EQUALLY,
PREMIER INN AND ITS EMPLOYEES
SHOULD NOT FACILITATE OTHERS
TO EVADE TAX.

#### WHAT DO WE MEAN?

Tax evasion is a crime and Premier Inn can be criminally liable for acts committed by an employee, agent or consultant which facilitate others to evade tax. Common risks include requests for payment in cash or redirected payments. If tax evasion takes place, a business could face an unlimited fine as well as criminal convictions.

If you have any concerns that any team member, supplier or other person connected with Premier Inn may have entered into any transaction to evade tax or to assist any other person to evade tax, please speak to your line manager immediately and if in doubt, please contact the Premier Inn Finance team

I work in finance and have been asked by a supplier to pay into an off shore bank account. Payments normally go to a UAE bank account.

What should I do?

4

If a supplier has asked you to do something unusual, this may require further investigation as it may involve tax evasion.

Please speak to your line manager straight away and if in doubt, please contact the Premier Inn Finance team.

#### **INSIDE INFORMATION**

#### **OUR PRINCIPLE:**

INFORMATION ABOUT THE
COMPANY WHICH MAY AFFECT
WHITBREAD'S SHARE PRICE IF
IT BECAME PUBLIC KNOWLEDGE
MUST NOT BE USED FOR BUYING
OR SELLING WHITBREAD SHARES
FOR YOUR OWN OR ANYONE
ELSE'S BENEFIT.

#### WHAT DO WE MEAN?

Whitbread is a company listed on the London Stock Exchange. There are rules and regulations that apply to listed companies preventing individuals buying or selling Whitbread shares on the basis of inside information.

Anyone working for or with Whitbread may become aware of inside information about Whitbread or its businesses. Inside information may include:

- > Financial information;
- > Development of new products or services;
- A proposed business opportunity like buying or selling a business or entering or ending a joint venture;
- Government or regulatory body investigation into the company;
- > Changes in senior personnel.

It makes no difference whether you deal in the shares yourself or someone else does it for you, whether it's for your own or anyone else's benefit. This applies even after you've stopped working for Whitbread.

It is a criminal offence to buy or sell Whitbread shares on the basis of inside information.



It is not public knowledge yet, but I know from my work that our profits could be higher than expected so now would be a good time to buy Whitbread shares.

Can I buy Whitbread shares? If I can't, can I tell my family and friends?

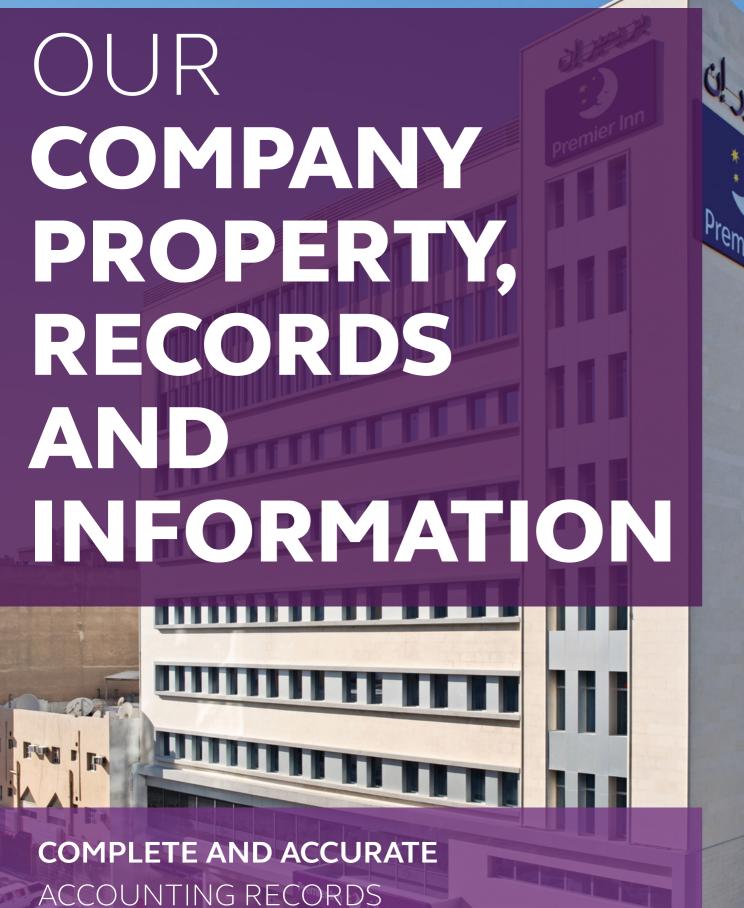


Absolutely not. It's called 'insider dealing' and it is a very serious criminal offence.

If in doubt, speak to the most senior member of the Finance team.

Premier Inn Code of Conduct 2023

**Premier Inn** Code of Conduct 2023



DATA PROTECTION AND PRIVACY

PROTECTING COMPANY PROPERTY

**CONFIDENTIAL** INFORMATION

#### PROTECTING COMPANY PROPERTY

#### **OUR PRINCIPLE:**

WE SHOULD LOOK AFTER
PREMIER INN PROPERTY AS IF IT
WERE OUR OWN; WE SHOULD
USE IT CAREFULLY AND PROTECT
IT FROM ANY MISUSE.

#### WHAT DO WE MEAN?

We all use company property in order to carry out our jobs. This includes owned and operated buildings, team member accomodation, vehicles, equipment, supplies, computers, networks, e-mail and voicemail systems. Likewise, as part of our jobs we will create or develop things like brands, trade marks, designs, ideas, software, inventions as well as being privy to corporate opportunities, trade secrets and business information, all of which is company property too. This principle extends to third parties we may work with.

Please look after all Premier Inn property as if it were your own. We understand that from time to time our employees may use company equipment to access the internet for personal reasons but we should always protect it from misuse.



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## **COMPLETE AND ACCURATE**ACCOUNTING RECORDS

#### **OUR PRINCIPLE:**

WE SHOULD ENSURE ALL FINANCIAL AND OTHER REPORTS AND RECORDS ARE HONEST AND ACCURATE.

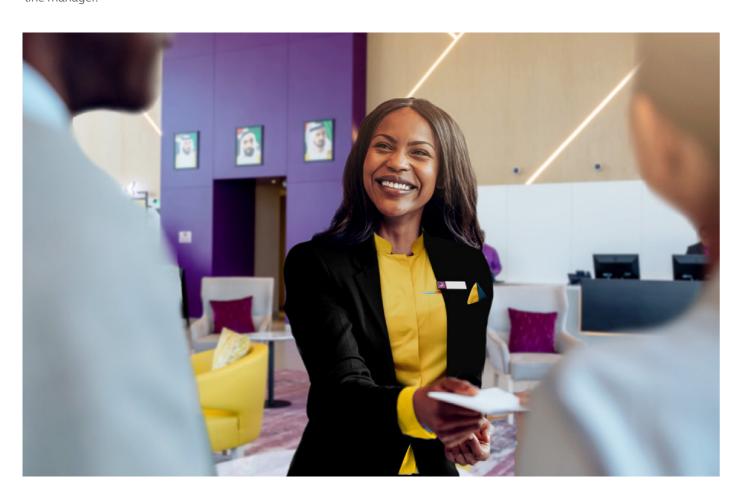
#### WHAT DO WE MEAN?

Honest and accurate records help our shareholders see how their investments are being looked after. They're also a legal requirement.

Creditors, government officials, partners and people from across Premier Inn all need to access books, records and statements about our financial performance. These must give fair and accurate information and be protected from unauthorised viewing, damage and loss. It's important that you keep all documents safely and for the right length of time.

All people who work regularly with our reports and records need to follow our guidelines and procedures. If you are unsure of anything, always check with your line manager.

It's **important** that you keep all documents safely and for the right length of time.



#### **CONFIDENTIAL INFORMATION**

#### **OUR PRINCIPLE:**

WE SHOULD KEEP ALL NON-PUBLIC INFORMATION SAFE AND MAKE SURE IT NEVER GETS INTO THE WRONG HANDS.

#### WHAT DO WE MEAN?

Please be aware of where you are when you are discussing or working on company matters.

Premier Inn's business information is one of our most valuable possessions and we expect all team members to keep this information confidential and safe, only share it internally on a "need to know" basis and only disclose it to a third party on a confidential basis and with legal or company permission to do so.

Confidential information may include:

- Financial information, business plans, business strategies, business practices and relationships, processes, systems or methods of operation;
- Specifications, pricing policies, marketing plans, costs or promotional activities;
- > Inventions, innovations, know how or trade secrets;
- Information relating to customers, suppliers and partners.

If you're unsure whether company or business information is confidential, speak to your line manager before telling anyone else. Also let your line manager know if any such information has been shared or used without permission. If in doubt, you should speak to the most senior Finance team member before information is shared or disclosed.

We have designated people who are solely responsible for talking to the media. This is to make sure that no confidential data or business information can accidentally be made public. So, please don't talk to the media, even if they approach you.



On some days I work from home but when I feel the need to get out, I take my laptop with me and go for a coffee at a coffee shop.

Is this a problem?

4

You must be very careful when working in public areas not to discuss company or business information where other people may overhear you or view your laptop screen.

If it is necessary to conduct a call in a public place, be mindful of your surroundings and inform the person you are speaking to of your whereabouts to manage their expectations.

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#### **DATA PROTECTION AND PRIVACY**

#### **OUR PRINCIPLE:**

WE MUST RESPECT EVERYONE'S PRIVACY AND ENSURE THAT WE COLLECT, USE, STORE AND DISPOSE OF ALL PERSONAL DATA IN COMPLIANCE WITH ALL APPLICABLE DATA PROTECTION LAWS.



#### WHAT DO WE MEAN?

Data protection and privacy laws regulate how we collect, use and manage personal data (such as names, addresses, dates of birth, national insurance numbers, passport numbers and other data which can identify an individual). This data may relate to our employees, guests or customers, suppliers and partners.

We must comply with data protection laws whilst also complying with our own standards and policies on personal data.

We only collect personal data in accordance with data protection laws. We must protect personal data and keep it secure at all times and in addition, we must take particular care when dealing with sensitive personal data (such as sickness records and health questionnaires).

Please make sure all personal data is managed or handled in accordance with the permissions given by the individual to whom the data relates.

We should anonymise data where and when necessary. This means removing names, contact details or any other information that could identify an individual. You should also protect personal data by using privacy enhancing techniques such as encryption where this is possible. Please read the Information Technology policies on the various security techniques that can be used.

If you're unsure whether data should be disclosed, speak to your line manager straight away. Likewise, you must inform your line manager if any personal data has been accessed, shared used or deleted without permission. Line managers must report any data breach to the Premier Inn Information Technology Director.

Please refer to Premier Inn's Information Security policies and Group Data Protection policy and guidance documents as these will give you more information on who to contact and what to do when handling personal data, or in the event of a breach.

We must all treat every team member, customer, supplier or anyone else we work with, with **respect.** 



I have lost my laptop.

What should I do?



You may have stored employee or customer details (such as guest contact details) or other data incident email address, personal information on your laptop. This is personal data and it is important that it does not fall into the wrong hands so please ensure that you inform your line manager and in any event, you must report your lost laptop to Premier Inn's Information Technology team straight away.

Q

I want to send a list of customer names and addresses by email.

Is this OK?



Customer names and addresses are personal data and we must ensure these are kept secure at all times. Before sending the list via email or other means, please ensure that the appropriate security measures are applied. Please read the Information Technology policies as well as the Group Data Protection policy guidence documents for further guidance. If you are unsure, please discuss with your line manager or the information technology team before you send the list.

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#### **OUR ENVIRONMENT AND COMMUNITIES**

#### **Force for Good**



Our strategy is split into three pillars...

#### **OPPORTUNITY**

A team where everyone can reach their potential and fulfil their career ambitions

#### **COMMUNITY**

Making a meaningful contribution to the customers and communities we serve.

#### **RESPONSIBILITY**

Always operating in a way that respects people and the plane

#### Enabling people to live and work well

Premier Inn has always been about people, and we always will be. So, it makes sense that our sustainability programme is all about people too. It's called Force for Good; it's about helping everyone – our customers, team members and those we work with – to live and work well.

We focus on three areas to make this happen. First, we're committed to being a place where everyone can reach their potential with no barriers to entry and no limits to growth. We're committed to making a meaningful contribution to the customers and communities we serve. And we treat our people and planet with respect. How we treat people and the impact we have on our communities and environment

is just as important as the experiences we provide. Force for Good supports us to create an even better place to work. It helps us serve customers today, and tomorrow, better than before. It helps us build brands that our customers love and trust. And helps us create a forward looking, sustainable and successful business.

Force for Good starts with people. **It starts with you.** 



## BUSINESS PRACTICES OR STANDARDS OF BEHAVIOUR DECISION-MAKING FRAMEWORK

Identify the business conducted or ethical problem

List possible solutions (what could you do?) and any obstacles to resolving the problem.

Determine the best approach (what should you do?)

Seek input from others, if appropriate

Is it consistent with our values, standards and any applicable law or regulations?

Would your approach embarrass you at Premier Inn?

How would your approach look if published in the newspaper or online?

Would you be comfortable with the example it sets for future decisions?

If the path isn't clear

Ask for guidance

Follow through on your decision

You can deliver great customer experiences and conduct business with integrity knowing that Premier Inn supports you in doing the right thing.

> You play a critical role in protecting our values, our brands and our reputation and in ensuring that Premier Inn has a great work environment.

If you are unsure of what to do in a situation, you have guidance available to you including our Business Practices and Standards of Behaviour.

When you believe something isn't right, it probably isn''t. Please speak up and share your genuine concerns, knowing that Premier Inn wants to hear them.

#### **FREQUENTLY ASKED QUESTIONS**

## DO YOU HAVE AN ISSUE YOU WOULD LIKE TO RAISE BUT YOU ARE NOT SURE OF THE BEST ROUTE?

#### USE THE BELOW FLOWCHART TO HELP YOU.

If you are nervous about raising any of the below, please be assured that you as an employee will be treated fairly and we take all concerns and feedback very seriously.

Is your concern about our own employment or how you have been treated?

Do you have a serious concern which has affected a number of different people?

Do you have feedback about the business?

- Has a team member or manager treated you unfairly?
- Has someone not followed the correct process which has negatively impacted you?
- > Have you been discriminated against?
- Has there been an unfair change to your pay, shifts or hours?

If you answered yes to one of the above a resolution to your concerns should be looked into informally in the first instance. If your concerns have not been resolved through an informal process you should raise the details of your concerns to your line manager or to the HR team or refer to our Speaking Out Policy.

If you are aware of another team member who has concerns similar to the above, we ask that you encourage them to follow this process. Has someone committed a criminal offence or failed to comply with the law relating to:

- > Human rights;
- > Open and fair competition;
- Bribery and corruption;
- > Fraud or theft;
- > Tax evasion;
- Accurate accounting records;
- Data protection
- Is someone's health and safety in danger?
- Is the company causing risk or actual damage to the environment?
- > Is someone covering up any of the above?

If you answered yes to one of the above, you should refer to our **Speaking Out Policy** 

Please note that a report to Speaking Out can be raised anonymously but must include as much detail as possible or any relevant evidence.

- Do you have an idea to improve the companies' current structure, processes, systems or policies?
- Do you have a possible solution to a challenge the business faces?
- > Do you have a question about a recent business decision or change?

Raise to your line manager and/or share your comments on our Pulse Survey and we will take your suggestions into consideration.



## Premier Inn Middle East Supplier Code of Conduct







#### PREMIER INN MIDDLE EAST

#### SUPPLIER CODE OF CONDUCT

#### Foreword – Simon Leigh, Managing Director

At Premier Inn, building and maintaining trust is integral to every interaction, whether within our teams or with our suppliers, investors or guests. We've worked hard to earn it, and we must protect it.

We choose our suppliers carefully because we value integrity, respect and a commitment to doing the right thing. These principles are at the core of our trusted relationships with our suppliers and contribute to the success of our brand, helping us to maintain strong loyalty among our customers and guests.

We expect our suppliers to uphold the same high standards that we set for ourselves. The way our suppliers conduct business reflects on Premier Inn and the value that we place on long-term, mutually beneficial partnerships. We maintain a culture of zero tolerance for unethical practices, and we expect all of our suppliers to operate at the highest level of professionalism and ethical behaviour.

This Supplier Code of Conduct outlines the business practices and standards of behaviour that we expect from our suppliers.

We cannot anticipate every situation that you may come across, but by understanding our values, business practices and standards of behaviour, you can apply them to any situation.

#### 1. The Code

1.1. Corporate integrity, responsible sourcing, environmental sustainability and the safety and wellbeing of the Workers of the Suppliers with whom we do business are of paramount importance to Premier Inn. These core principles are reflected in this Supplier Code of Conduct (the "Code"), which establishes the minimum standards and behaviours that must be met by any entity that supplies products or services to Premier Inn. This Code sits alongside Premier Inn's Responsible Sourcing Policy.

#### 2. Definitions and Scope

#### 2.1. In this Code:

**Representative** means the Supplier's suppliers and any subcontractors, vendors and agents who form part of Premier Inn's supply chain.

**Supplier(s)** means a body corporate, partnership or individual that provides goods or services to Premier Inn or one or more members of the Premier Inn group of companies and includes, where relevant, their contractors or agents.

**Worker** means any individual whom the Supplier employs, hires, engages or otherwise uses to conduct its business

#### 2.2. Who does the Code apply to?

This Code applies to and must be complied with by all Suppliers (which includes subcontractors, service providers, professional service providers, consultants, intermediaries and agents) to Premier Inn and their Workers in their work with Premier Inn and throughout their supply chains.

#### 3. Supplier's Commitment and General Requirements

- 3.1. The Supplier agrees that:
  - 3.1.1. it will comply with the requirements set out in this Code;
  - 3.1.2. it has appropriate systems in place to ensure its continuous compliance with this Code and to demonstrate to Premier Inn such compliance;
  - 3.1.3. it shall comply with all of the relevant laws, regulations and standards of the countries in which it operates;
  - 3.1.4. any breach of this Code will allow Premier Inn to terminate its relationship with the Supplier with immediate effect; and
  - 3.1.5. if there is a conflict between any applicable laws or regulations or the provisions of an agreement with Premier Inn and the provisions of this Code, it shall meet the most stringent standard.

#### 4. Principles

#### 4.1. Health and Safety

- 4.1.1. The Supplier must ensure a safe working environment for its Workers, contractors, partners or others who may be affected by its activities in accordance with international standards and national laws.
- 4.1.2. The Supplier must have in place mechanisms to ensure that health and safety obligations are communicated and applied to parties under its control.
- 4.1.3. The Supplier must ensure that it meets general principles of health and safety risk prevention. General principles include identifying, minimising and preventing hazards, using competent and trained people and providing and maintaining safe equipment and tools, including personal protective equipment as required.
- 4.1.4. The Supplier must have mechanisms and must implement them to ensure that all of its Workers are competent to carry out the health and safety aspects of their responsibilities and duties. This must include the nomination and training of persons at an appropriate level who are responsible for discharging the Supplier's health and safety obligations.
- 4.1.5. The Supplier must have systems and training in place to prepare for and respond to accidents, health problems and foreseeable emergency situations. The Supplier must have means and procedures in place for recording, investigating and implementing learning points from accidents and emergency situations.

4.1.6. The Supplier must ensure that all of its Workers work without the influence of alcohol, illegal drugs or other substances that might alter their judgement and abilities.

#### 4.2. Slavery, Human Trafficking and Forced and Child Labour

4.2.1. The Supplier must comply with all applicable anti-slavery and human trafficking laws and statutes in any part of its supply chain. This includes, but is not limited to, not supporting, engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour.

#### 4.3. Human Rights

4.3.1. The Supplier must comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of its supply chain.

#### 4.4. Working Hours

4.4.1. The Supplier must ensure that the working hours of its Workers do not exceed the maximum set by local law.

#### 4.5. Wages and Remuneration

- 4.5.1. The Supplier shall ensure that its Workers understand their employment conditions and give its Workers fair and reasonable pay as well as any legally entitled or agreed benefits.
- 4.5.2. The Supplier must compensate all of its Workers with wages, including overtime, and benefits that, at a minimum, meet the higher of:
  - (a) the minimum wage and benefits established by applicable law;
  - (b) collective agreements; or
  - (c) industry standards.
- 4.5.3. The Supplier shall not use deductions from wages as a disciplinary measure. Workers must be paid in a timely manner, and the Supplier must clearly convey to its Workers the basis on which they are paid.

#### 5. Disciplinary Practices

5.1. The Supplier will treat all of its Workers with respect and dignity. The Supplier shall prohibit physical or verbal abuse or other harassment and any threats or other forms of intimidation.

#### 6. Confidential Information

- 6.1. The Supplier must keep all non-public/confidential information in respect of Premier Inn safe.
- 6.2. The Supplier must ensure that all confidential information is only shared with third parties on a confidential basis with Premier Inn's permission.

- 6.3. Confidential information may include (but is not limited to):
  - 6.3.1. financial information, business plans, business strategies, business practices and relationships, processes, systems or methods of operation;
  - 6.3.2. specifications, pricing policies, marketing plans, costs or promotional activities;
  - 6.3.3. inventions, innovations, know-how or trade secrets; and
  - 6.3.4. information relating to customers, Suppliers and partners.
- 6.4. The Supplier must not talk to the media, if approached, to ensure that no confidential data or business information is accidentally made public. If approached by the media, the Supplier must report this to Premier Inn as soon as possible.

#### 7. Speaking Out

- 7.1. The Supplier must report any major business wrongdoings via the Speaking Out helpline email <u>SpeakingOut@mena.premierinn.com</u>
- 7.2. Major business wrongdoings may relate to an individual, a site, a department, the whole organisation or any of Premier Inn's Suppliers and concern unethical, illegal or unsafe business practices such as:
  - 7.2.1. bribery/corruption;
  - 7.2.2. theft/fraud;
  - 7.2.3. mismanagement of funds;
  - 7.2.4. misuse of corporate assets;
  - 7.2.5. serious health and safety violations;
  - 7.2.6. serious environmental concerns;
  - 7.2.7. misleading marketing/advertising; and
  - 7.2.8. data privacy breaches.
- 7.3. Any reports can be made by the Supplier anonymously and in confidence; Premier Inn will investigate all reports made and feed back to the Supplier.

#### 8. Data Protection and Information Security

- 8.1. The Supplier shall comply with all data protection laws and requirements when using, processing, or storing any personal data on Premier Inn's behalf.
- 8.2. The Supplier shall have in place appropriate measures to:
  - 8.2.1. protect the integrity and confidentiality of information (including information belonging to or supplied by Premier Inn) held on its systems (which include physical and online or electronic systems); and
  - 8.2.2. ensure that there is no unauthorised access to the information by third parties, including its Representatives.

#### 9. Environmental Responsibility and Communities

- 9.1. Premier Inn's Force for Good strategy is split into three pillars: opportunity, community and responsibility. The Force for Good strategy is about helping everyone, including Premier Inn's customers, team members and others who Premier Inn works with, to live and work well.
- 9.2. As Premier Inn is, the Supplier shall be committed to helping everyone reach their potential with no barriers to entry and limits to growth. The Supplier shall be committed to making a meaningful contribution to the customers and communities that it serves.
- 9.3. The Supplier must treat all people and the planet with respect.
- 9.4. The Supplier shall ensure that:
  - 9.4.1. its operations comply with all applicable environmental laws and international standards;
  - 9.4.2. the goods it manufactures (including the inputs and components that it incorporates into its goods) comply with all applicable environmental laws and treaties; and
  - 9.4.3. it will only use packaging materials that comply with all applicable environmental laws and treaties.
- 9.5. The Supplier shall have in place a suitable environmental management system for managing its environmental risks. As a minimum, the system should include and address the following:
  - 9.5.1. an assessment of the environmental impact of all historical, current and likely future operations;
  - 9.5.2. steps to continuously improve environmental performance and reduce pollution, emissions and waste;
  - 9.5.3. measures to reduce the use of all raw materials, energy and supplies; and
  - 9.5.4. raising awareness and training Workers in environmental matters.
- 9.6. The Supplier shall identify, minimise, monitor, control and treat all hazardous air pollutants and should avoid all emissions in accordance with international standards and applicable laws.
- 9.7. The Supplier shall promote recycling and reduce wastage in material sourcing, handling, transport and disposal.
- 9.8. The Supplier shall seek to promote energy and carbon efficiency where appropriate.
- 9.9. The Supplier shall embrace and promote sustainability initiatives.

#### 10. Bribery and Corruption

- 10.1. The Supplier must comply with all applicable laws, statutes, codes and regulations relating to the prevention of bribery and corruption. To that end:
  - 10.1.1. the Supplier shall not accept, offer, promise, pay, permit or authorise:
    - (a) bribes, facilitation payments, kickbacks or illegal political contributions;

- (b) money, goods, services, entertainment, employment, contracts or other things of value in order to obtain or retain improper advantage; or
- (c) any other unlawful or improper payments or benefits.
- 10.1.2. The Supplier shall not evade or facilitate the evasion of tax by another person anywhere in the world.
- 10.2. The Supplier must have an anti-bribery policy that sets out the principle of zero tolerance to any form of bribery or corruption within their organisation, including facilitation payments.
- 10.3. The Supplier must not give, promise, receive or request any bribes (financial or otherwise), including, but not limited to, relations with public officials.
- 10.4. The Supplier must ensure that its Workers, contractors and subcontractors are aware of its anti-bribery policy and comply with the requirements set out in it.

#### 11. Fraud and Money Laundering

#### 11.1. The Supplier must:

- 11.1.1. act in accordance with all applicable international standards and laws on fraud and money laundering;
- 11.1.2. not do or omit to do anything likely to cause any party to be in breach of any such international standards and laws; and
- 11.1.3. maintain an effective anti-fraud and (where appropriate) anti-money laundering compliance programme that is designed to ensure its compliance with the law, including the monitoring of compliance and detection of violations.

#### 12. Conflict of Interest

- 12.1. Premier Inn's principle is to avoid or manage situations where personal interests could conflict with the interests of Premier Inn.
- 12.2. The Supplier must act in Premier Inn's interests and avoid all conflicts of interest or situations that may be interpreted as conflicts of interest.
- 12.3. The Supplier must promptly report to Premier Inn any instances involving actual or apparent conflicts of interest between the Supplier's interests and the interests of Premier Inn.
- 12.4. The Supplier shall not, without prior written notification, enter into any business relationship with any director, employee, or representative of Premier Inn (in a personal capacity) that may create a conflict of interest with their fiduciary obligations or the interests of Premier Inn.

#### 13. Unfair business practices

13.1. The Supplier must comply with all applicable competition laws (including, but not limited to, the Competition Act 1998), including, but not limited to, those relating to information sharing with competitors, price fixing and rigging bids or any other mechanism that limits fair competition.

#### 14. Protecting Premier Inn Property

- 14.1. Premier Inn's principle is that everyone should look after Premier Inn's company property as if it were their own.
- 14.2. The Supplier must use Premier Inn's company property carefully and protect it from any misuse, which includes theft, damage or unauthorised copy.
- 14.3. The Supplier must only share Premier Inn's company property with prior consent from an authorised representative of Premier Inn.
- 14.4. The Supplier must maintain appropriate processes to manage the use and sharing of Premier Inn's company property by any Worker.
- 14.5. Premier Inn's company property includes things such as brands, trade marks, designs, ideas, software and inventions, corporate opportunities, trade secrets and business information.

#### 15. Procuring and Managing Representatives

- 15.1. The Supplier must carry out appropriate due diligence on prospective Representatives that may form part of Premier Inn's supply chain. As a minimum, the due diligence must include the following:
  - 15.1.1. investigations into prospective Representatives' stances, public statements, compliance with applicable laws and other actions on human rights, the treatment of workers, bribery, ethical behaviour and the environment;
  - 15.1.2. risk assessments for countries from which materials, components or finished goods are sourced by prospective Representatives; and
  - 15.1.3. investigations into the prospective Representatives' abilities to meet the requirements and principles that are set out in this Code.
- 15.2. In its dealings with Representatives, the Supplier must:
  - 15.2.1. ensure that agreements with Representatives include provisions that require the Representatives to comply with applicable provisions of this Code; and
  - 15.2.2. ensure that it has measures in place to monitor whether Representatives are complying with the applicable provisions of this Code and that it has systems in place to address any deficiencies or breaches.

#### 16. Certifying Compliance and Audit

16.1. The Supplier shall provide any additional third-party or self-certifications that are reasonably required to demonstrate its compliance with all applicable laws and frameworks within 14 days of a written request from Premier Inn.

#### 17. Self-Monitoring and Reporting Breaches

- 17.1. The Supplier must monitor its compliance with this Code and report any breaches (actual or suspected) of this Code as soon as possible to its Premier Inn contract manager.
- 17.2. The Supplier must not retaliate or take disciplinary action against any Worker that has, in good faith, reported breaches of this Code or questionable behaviour or sought advice regarding this Code.

#### 18. Training

- 18.1. The Supplier must implement a system of training for its Workers to ensure that they are aware of the requirements set out in this Code.
- 18.2. The Supplier must keep a record of all training offered and completed by its Workers and make a copy of such record available to Premier Inn on request.

#### 19. Compliance

- 19.1. The Supplier acknowledges and agrees that it is entirely responsible for its full compliance with this Code.
- 19.2. Premier Inn is exempt from monitoring and ensuring the Supplier's compliance with this Code.
- 19.3. Should any paragraphs of this Code conflict with any of the Supplier's contractual terms that are more explicit than this Code, the Supplier must abide by the contractual terms.

#### 20. Breach, Remediation and Termination

- 20.1. Where Premier Inn becomes aware of a material breach of this Code by the Supplier or its Workers or Representatives, Premier Inn may either:
  - 20.1.1. immediately terminate its business relationship with the Supplier (including any contracts); or
  - 20.1.2. require the Supplier to produce a remediation plan specifying the actions that it will take that will lead to its compliance with this Code and present it to Premier Inn within 7 working days of being requested to do so. If the Supplier fails to produce the remediation plan within this timeframe or fails to implement it within a reasonable timeframe, Premier Inn may immediately terminate its business relationship with the Supplier (including any contracts). Premier Inn may also suspend its business relationship with the Supplier while remediation is ongoing.

