

THE WAY WE WORK AT **PREMIER INN**



3	Message from Simon Leigh, Managing Director
4	Our guests
5	Our values
6	About our Business Practices and Standards of Behaviour
7	Speaking out
8	Our people
9	Human rights
10	Respect in the workplace
12	Equal opportunities
13	Staying safe at work
15	Developing our people
15	Listening to your views
16	Our business
17	Complying with laws
18	Open and fair competition
19	Marketing and advertising
20	Conflicts of interest
21	Political activities
22	Gifts and hospitality
23	Bribery and corruption
24	Fraud and theft
25	Tax evasion
26	Inside Information
27	Our company property, records and information
28	Protecting company property
29	Complete and accurate accounting records
30	Confidential information
31	Data protection and privacy
32	Our environment and communities
33	Business practices and standard of behaviour decision-making framework
34	Frequently Asked Questions



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.

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

OUR VALUES

IT'S NOT JUST ABOUT WHAT WE DO, **IT'S HOW WE DO IT.**

Our behaviour is what people see and we will strive to create a culture that reflects the highest standards of behaviour, based on our core values. Each one of us takes personal responsibility for it.

GENUINE REALLY CARING ABOUT OUR CUSTOMERS

We are true to ourselves and honest to others. We make customers and teams feel special. We do good in the community.

CONFIDENT STRIVING TO BE THE BEST AT WHAT WE DO

We welcome change and new ways of doing things. We appreciate that feedback is important. We speak up when there's a better way.

COMMITTED WORKING HARD FOR EACH OTHER

We step up to get things done. We work well with others. We are always looking to improve the customer experience.



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:

- 1

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.
- 2

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.
- 3

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.
- 4

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.

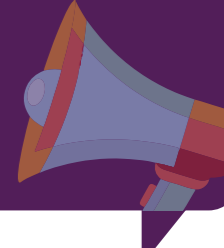
Open communication with your line manager is critical to ensure a successful working relationship and so the best way to deal with most issues or concerns is to talk to your line manager, or another person responsible for your area. Any genuine issues, or concerns raised in good faith, will be taken 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



Scan to
Speak Out





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.

Q

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.

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**.

Q

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?

A

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.

Q

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

A

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.

A

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.

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.



Q

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?

A

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.

Q

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

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

A

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.

Q

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?

A

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.

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 refer to the Speaking Out Policy straight away.



Q

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?

A

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.

Q

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

What should I do to stay safe?

A

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.

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.



OUR
BUSINESS

- COMPLIANCE WITH LAWS
- MARKETING AND ADVERTISING
- CONFLICTS OF INTEREST
- OPEN AND FAIR COMPETITION
- BRIBERY AND CORRUPTION
- POLITICAL ACTIVITIES
- GIFTS AND HOSPITALITY
- FRAUD AND THEFT



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.



Q

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?

A

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 competitors mutually 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.

Q

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?

A

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.

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 team.



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.

Q
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?

A
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.

A
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.

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.



Q
I am keen on participating in local politics.
Is this OK?

A
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.

Q
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?

A
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.

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.

Q

A guest is offering me a tip for my services.

Is that OK?

A

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

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

What should I do?

A

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.



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

Q

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?

A

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.

Q

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?

A

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.

OUR COMPANY PROPERTY, RECORDS AND INFORMATION

COMPLETE AND ACCURATE
ACCOUNTING RECORDS
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 accommodation, 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.



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.

Q

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?

A

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.

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.



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 guidance documents for further guidance. If you are unsure, please discuss with your line manager or the information technology team before you send the list.

OUR ENVIRONMENT AND COMMUNITIES

Force for Good



Our strategy is split into three pillars...



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



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?

- › 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.

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

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 feedback about the business?

- › 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.



www.premierinn.ae