

# HILTON SLAVERY AND HUMAN TRAFFICKING

FINANCIAL YEAR 2022

# Statement

This statement is published by Hilton, in compliance with the UK Modern Slavery Act 2015. It details the steps taken by Hilton to identify and take steps to prevent modern slavery and human trafficking in all parts of its business and supply chains across its global operations during Financial Year 2022.

Hilton manages, leases and franchises hotels, provides hospitality services, and carries on business in the United Kingdom largely through Hilton Worldwide Manage Limited and Hilton Worldwide Limited, as well as Hilton International Hotels (U.K.) Limited, Hilton HHC Limited, Hilton HIH Limited, Hilton Worldwide Holding LLP, Hilton International Entities Holding Limited, Hilton International Master Holding Limited, Hilton International IP Holding Limited, Hilton International IP Holding 2 Limited, HIC First LLC, HIC Second LLC, and Adda Hotels, each of which is an indirect wholly-owned subsidiary of Hilton Domestic Operating Company Inc. For the purposes of this statement, the companies carrying on business within the United Kingdom, listed above, on behalf of whom this statement is published, are collectively referred to as "Hilton."

## OUR COMMITMENT TO HUMAN RIGHTS

At Hilton, we have a shared purpose to be the most hospitable company in the world by positively impacting our guests, Team Members\*, hotel owners and communities. As a business of people serving people, respecting human rights is a core part of our mission. Hilton is committed to implementing human rights due diligence across our global operations and working with suppliers to eradicate any form of forced labor or human trafficking across our value chain. Hilton has also created and partnered with cross-industry networks to advance international human rights as part of our [2030 Travel with Purpose Goals](#). Hilton is a proud signatory of the United Nations Global Compact, and our human rights strategy is informed by the United Nations Guiding Principles for Business and Human Rights.

## OUR BUSINESS STRUCTURE

Hilton is a global hospitality company with a portfolio of 19 brands comprising over 7,100 properties with more than 1.1 million rooms in 123 countries and territories, supported by more than 400,000 Team Members.

Hilton Worldwide Holdings Inc. (HWHI) is publicly traded in the United States (NYSE: HLT) and is incorporated in the state of Delaware. HWHI has no independent operations and no material assets other than its ownership of 100% of the equity interests in Hilton Worldwide Parent LLC, a Delaware

limited liability company which, in turn, owns 100% of the equity interests in Hilton Domestic Operating Company Inc. (HDOC), a Delaware corporation. HDOC is the parent company of our various operating subsidiaries.

We operate our business through: (i) a management and franchise segment and (ii) an ownership segment, each of which is managed separately because of its distinct economic characteristics. The management and franchise segment includes all of the hotels we manage for third-party owners, as well as all

*\*Team Members include employees at Hilton corporate offices and its owned and managed properties, and employees of franchisees who work on-property at independently owned and operated franchise properties in the Hilton portfolio.*

Hilton



Hilton  
HONORS

franchised hotels that license our brands and where we provide other prescribed services to third-party owners, but the day-to-day services of the hotels are operated or managed by someone other than us. Franchised properties make independent decisions regarding their hotel operations, including procurement, employment, and training practices.

The 159,000 people employed at our managed properties, leased hotels, and our corporate offices are referred to below as “Hilton Employees.” The people who are employed by the owners (or their designees) of franchised properties are referred to below as “Franchise Employees.” There are approximately 259,000 Franchise Employees who work on-property at independently owned and operated franchise properties in the Hilton portfolio.

This chart depicts the number of Hilton hotels by type and as a percentage of the Hilton enterprise as of December 31, 2022:

	<b>Owned / Leased / Joint Venture by Hilton</b>	<b>Managed by Hilton</b>	<b>Franchised</b>	<b>Total</b>
<b>Operating hotels</b>	52	778	6,255	7,165
<b>Share of total operating hotels</b>	1%	11%	87%	100%

A more detailed description of our business model can be found in our [public filings](#).

## OUR SUPPLY CHAIN

Hilton Supply Management (HSM) is the global procurement and supply chain arm of Hilton. HSM supports more than 14,000 hotels across the world, approximately 6 percent of which are Hilton-leased or managed properties, 48 percent are franchises and 45 percent are independent businesses unaffiliated with Hilton. HSM develops and negotiates product and service supply programs with more than 4,000 suppliers to make available goods and services at the best combination of price, quality, and service.

HSM provides strategic sourcing for both furniture, fixtures, and equipment and operating supplies and equipment:

- Food and beverage sourcing includes everything customers need to complete the construction, renovation and replenishment of their kitchens, from supplies and equipment to consumable products;
- Sourcing for guest rooms and public spaces includes everything customers need for in-room, public space, and fitness and wellness areas, from housekeeping carts and uniform apparel to bedding and bath amenities to fitness and spa equipment and flooring.
- Sourcing for property operations includes service agreements for maintenance, repair and operations, equipment and supplies such as tools, hardware and electronics, and print and promotional items such as key cards and on-property marketing materials.
- Sourcing for power includes sourcing for electricity and natural gas in regulated and deregulated markets, providing renewable energy and related utilities programs, offering programs for efficiently reducing the cost and carbon footprint associated with the

**Hilton**



**Hilton**  
HONORS

consumption of required utilities, and managing supplier relations for purchasing energy-related hotel services and products.

Hilton conducts human rights due diligence across our global operations and in our supply chains to identify, address and mitigate adverse human rights impacts. We utilize the EcoVadis platform, Exiger platform, third-party due diligence consultants, and our own internal due diligence process to assess third parties' practices with respect to human rights. We require suppliers to provide specific human rights certifications and we provide suppliers with a copy of Hilton's Responsible Sourcing Policy, which outlines the fundamental social, environmental, and economic principles that are required of all suppliers. The results of our due diligence efforts inform updates to our policies and procedures to strengthen our human rights approach. HSM also makes available to suppliers training on modern slavery in labour sourcing.

While we strongly encourage hotel owners across our global portfolio to use HSM services, not all hotel owners choose to participate. In addition, hotel owners are responsible for establishing their own supply chain during the development stage of hotels, including construction.

## OUR HUMAN RIGHTS POLICIES AND GOVERNANCE

Our commitment to respecting human rights is enshrined in our [Code of Conduct](#), [Human Rights Principles](#), and [Responsible Sourcing Policy](#), including the prohibition of forced labour, bonded labour, child labour, slave labour, human trafficking and recruitment fees, and the prohibition for any Hilton property, product, or service from being used in any manner that supports or enables any form of abuse or exploitation. The Code of Conduct, Human Rights Principles, and Responsible Sourcing Policy apply to Hilton Team Members and are reviewed and updated periodically.

We also make the Code of Conduct, Human Rights Principles, and Responsible Sourcing Policy available to our franchisees and our business partners to educate them on Hilton's business principles and to encourage them to develop similar policies and procedures for their own operations and to share those policies and procedures with their respective business partners. The Responsible Sourcing Policy, which incorporates our Human Rights Principles, is attached to all new contracts with suppliers and is part of the contractual requirements. The Human Rights Principles

also are shared with all new owners and referred to as part of the new country development mitigation plan brand standard.

In addition, our human rights-related trainings, guidance, tools, and network of partners are available to franchisees. We encourage franchisees to leverage these resources through regular internal communications. We review and update these materials periodically.

Hilton's human rights strategy is part of our overall Environmental, Social and Governance (ESG) strategy. Our Board of Directors works with the business to set Hilton's strategic direction and ensure the business is managed ethically and responsibly. The Nominating and ESG Committee reviews and assesses our ESG strategy, practices and policies and makes recommendations to the Board as appropriate. Our Executive Committee approves major ESG programs and monitors progress towards our Travel with Purpose 2030 Goals. During 2022, the Chief ESG Officer oversaw Hilton's ESG strategy and reporting efforts and reported directly to our CEO, who is accountable for ESG-related issues and decisions.

Hilton



Hilton  
—HONORS—

## OUR DUE DILIGENCE PROCESSES – RISK IDENTIFICATION AND MONITORING

In 2015, we completed a global human rights impact assessment across our business activities, including managed and franchised hotels, corporate offices, and business relationships. This assessment focused on the risk our business operations may pose to individuals' rights in terms of severity and likelihood, based on external research and experience. Our assessment identified the following salient modern slavery risks:

- 1) Operations: Hotel Team Members may be in situations of forced or bonded labour. Hotels may also be used by criminals to traffic victims for sexual exploitation.
- 2) Supply chain: Individuals employed by Hilton hotels via a recruitment agency or a labour outsourcing agency, or by other goods or services suppliers may be in a situation of forced / bonded or child labour as a result of a range of potential factors, from excessive recruitment fees to inappropriate monitoring of workers' ages.
- 3) Development phase: Construction workers employed by owner-appointed contractors may pose situations of forced / bonded or child labour as a result of a range of potential factors, from excessive recruitment fees to restrictions on freedom of movement or failure to monitor workers' ages.

We identified potential higher vulnerability for certain groups across these risk areas, including children, women and migrant workers.

We also conducted a mapping exercise of our global supply chain across a range of economic, environmental, and social risks, including human rights, based on external indicators and spend. We refreshed the analysis in 2019, focusing on modern slavery issues, and identified the following categories for additional attention: meat, seafood, produce, garments and textiles, and services.

We mapped our operating hotels against 11 external human rights risk indices in both operations and supply chain. For example, the Modern Slavery Index assesses the risk to business in any industry of the possible association with or exposure to practices of slavery, servitude, trafficking in persons and forced labour by state and non-state actors within its supply chain, as defined by global risk and strategic consulting firm Verisk-Maplecroft. Based on this analysis, we estimate 12.7 percent of Hilton-branded hotels are located in countries with higher risks of modern slavery in the supply chain. This analysis informs the prioritization of our work, including the deployment of tools and processes at managed hotels and efforts to make such tools available for franchise business partners, particularly in higher risk areas.

We supplement our index-based mapping exercises with data collected via our internal Global Enterprise Risk Survey, which is distributed to more than 300 Hilton leaders, and includes human rights and modern slavery issues. The Global Intelligence team uses a social media-monitoring platform that identifies possible human trafficking situations based on keyword scraping and commercial ads.

---

Hilton



---

Hilton  
HONORS

Our dynamic risk identification and continuous monitoring processes help inform our human rights strategy and the prioritization of countries and issues for more detailed risk assessment, due diligence, and training across operations, supply chain and hotel development.

## OUR DUE DILIGENCE PROCESSES – RISK MITIGATION

Our mitigation response to identified risks varies based on Hilton’s relationship to the situation and the leverage we have in each context.

### 1. Reporting and monitoring

We encourage Team Members to raise concerns about potential violations of our Code of Conduct, including risks of human trafficking or modern slavery, via the [Hilton Hotline](#). The Hotline is an anonymous reporting mechanism available for anyone to report concerns regarding our corporate offices or leased and managed properties. The Hotline also is available externally to suppliers, business partners, consumers and community members. For leased and managed hotels, Hilton directly reviews and investigates Hotline reports, and tracks findings and responsive actions. For franchised hotels, Hilton ensures allegations are formally communicated to the relevant franchise owner with reminders about the franchise owner’s contractual obligations, the brand standards, and the law. Hilton’s Global Compliance team is responsible for ensuring all Hotline reports receive appropriate reviews and a response. On a quarterly basis, the Global Compliance team provides confirmation to Hilton’s Board of Directors and external auditors that all Hotline reports have received appropriate treatment. The Global Compliance team also engages in benchmarking to ensure the Hotline mechanism is functioning effectively in terms of expected volume of reports.

### 2. Operations

Hotels are required to report potential situations of modern slavery via an incident alert mobile application. Alerts are managed and triaged by the corporate Safety and Security team and the emergency operations centre, involving all necessary stakeholders to respond appropriately. Identified trends inform the strategy for training.

We also focus our attention on addressing a number of critical operations-related issues, including:

**Human Trafficking:** All hotel-based Team Members are required to complete training on how to identify and report signs of human trafficking (see relevant sections below). The process is managed by the ESG, Legal Compliance and Human Resources teams globally, with the support of Safety and Security. A list of signs to identify risks of human trafficking for sexual exploitation and forced labour is posted in Team Member areas at all managed hotels globally. In the United States, we place posters to raise awareness of the U.S. National Anti-Trafficking Hotline in guest-facing areas of our managed hotels, as required by some state laws, and we share

available resources with franchised hotels. In 2020, the Safety and Security team further enhanced our data analytics to support victim-centered anti-exploitation efforts in the United States. We also monitor evolving state, regional, and national legislation relating to trafficking to ensure compliance.

**Orphanage Tourism:** We recognize “orphanage tourism” may take place in certain countries where we operate. We regularly remind all hotels not to offer or promote any tour that would include orphanages.

---

Hilton



---

Hilton  
—HONORS—

**Safe And Ethical Recruitment:** We understand some unscrupulous organizations may use the Hilton name to fraudulently recruit individuals and we specifically warn against [recruitment fraud](#) on our careers site. We do not charge recruitment fees and we require the same of our business partners. Whenever possible, Hilton hires candidates directly. When

candidates need to relocate, Hilton issues recruitment contracts directly to the candidates before the candidates depart from their home countries. In the Middle East and Africa, Hilton covers travel expenses for employees arriving at assigned work locations from overseas.

### 3. Supply chain

Our Responsible Sourcing Policy outlines the standards required of Hilton suppliers. Suppliers are required to have appropriate management systems in place and take steps to comply with this policy. We require suppliers to acknowledge our Responsible Sourcing Policy and to undergo deeper due diligence as appropriate. The process is managed by the HSM and the ESG teams.

We utilize a labour sourcing management process for our leased and managed hotels in Europe, the Middle East and Africa (EMEA). All outsourcing and recruitment agencies are contractually required to abide by the standards laid out in our Responsible Sourcing Policy and Human Rights Principles, including the prohibition of recruitment fees. We conduct due diligence and compliance checks on outsourcing and recruitment agencies, including initial screenings on human rights, before the agencies are placed on a regional list of preferred suppliers. We intend to expand this process to other regions.

**Recruitment agencies:** As part of our continuous process improvement efforts, in 2019, we conducted an analysis of ethical recruitment in the Middle East for our managed hotels where employees are primarily hired through recruitment agencies. We enhanced our recruitment manual and processes, from recruitment agency management to candidate interviews, through induction and welcome, to align with our commitment to ethical recruitment. If there are allegations that employees may have been required to pay recruitment fees, we investigate the claims internally. If the claims are substantiated, we immediately reimburse the individuals. We then require the agencies to reimburse Hilton and we assess whether Hilton can exercise its leverage over the situation and whether Hilton should continue utilizing the agency.

**Outsourcing agencies:** In 2019, we piloted the roll-out of contractual requirements for outsourcing agencies in managed hotels in EMEA to conduct third-party audits that cover all aspects of worker welfare, from recruitment to employment conditions. To support this requirement, we created training and resources for our hotels and labour providers on the risk of modern slavery in labour sourcing. We are evaluating further opportunities to continue and build on this pilot. We also strengthened the due diligence conducted by our Southeast Asia regional HSM and Safety and Security teams on security contractors, including requiring them to conduct reviews for potential indicators of modern slavery. When potential situations of forced labour are identified, we investigate the issue and take appropriate action, from developing mitigation plans with the supplier to evaluating whether to continue conducting business with the supplier.

Hilton



Hilton  
—HONORS—



## 4. Development and construction

We carry out due diligence review on potential hotel owners, including a human rights reputational review, and we provide our Code of Conduct and Human Rights Principles to all potential owners.

Prior to agreeing to develop a hotel in a new country, we conduct country-level due diligence, which includes a review of human rights in the region. The process is overseen by our Legal Compliance department and includes review by the Executive Compliance Committee, which is comprised of representatives from the Executive Committee. We have created risk-based country-level mitigation plans for more than 100 countries. These country-specific mitigation plans are implemented through a brand standard applicable to all new managed and franchised Hilton-branded hotels in that country. To help owners and business partners comply with these brand standards, we developed a suite of tools they can use to identify and manage human rights risks in operations and supply chains.

### TRAINING AND AWARENESS

We signed the [ECPAT Code](#) to combat sexual exploitation in the travel industry in 2011 and have been providing training on human trafficking risks to all our hotels ever since. Human trafficking training, Preventing Human Trafficking: Recognizing the Signs, is now mandatory for Team Members at all hotels globally as part of our Annual Compliance Training. Our annual Code of Conduct training includes a section on human rights and is mandatory for all Hilton Team Members. Additionally, 100 percent of our hotels were mapped against modern slavery risks and women's and girls' rights.

In addition to these trainings and awareness efforts, other notable training events in 2021 included:

**Human Trafficking Training around Major Events:** Our Safety and Security teams and outside partners routinely train hotel Team Members in person on identifying and combatting human trafficking on a risk basis. Hilton has been a partner of [It's a Penalty](#) – a non-governmental organization working to end abuse, exploitation, and human trafficking – since 2019. In 2022, Hilton continued to work with It's a Penalty to advance our shared goal of protecting human rights through educational outreach at high-profile sporting events and campaigns globally. In June, Hilton Birmingham Metropole welcomed more than 100 guests including media and sports ambassadors to a launch event ahead of the start of the Commonwealth Games in Birmingham. As part of Hilton's support for the important campaign, Team Members at the

hotel completed specialized training to spot the signs of human trafficking.

**Labour Sourcing:** We continued to roll out our Risks of Modern Slavery in Labour Sourcing e-Learning training. The training module is available to all Team Members, and mandatory for all Hilton Employees in EMEA who are key decisionmakers in recruitment and outsourcing decisions (i.e., General Managers, Human Resources, Procurement, Finance). From 2017 through the end of 2022, we achieved more than 9,000 Risks of Modern Slavery in Labour Sourcing course completions from Corporate and Operations Team Members, with focus on procurement roles. We developed guidance documents that provide additional help to hotels and agencies conducting due diligence in labour sourcing. Those documents are available to all hotels, including franchises.

Hilton

In 2019, our training on the Risks of Modern Slavery in Labour Sourcing became freely available to the global hospitality industry via the Sustainable Hospitality Alliance. This training will help accelerate the industry's ability to identify and mitigate those risks, in line with the [Sustainable Hospitality Alliance Forced Labour Principles](#) (see section below).

**Development:** We require owners to distribute training in anti-human trafficking and risks of modern slavery mandatory to their contractors based on a country-risk analysis through our new country development process.

**Performance indicators:** We have set ambitious goals aimed at mitigating modern slavery, forced labour, and human trafficking risks in our operations, and we recognize the importance of tracking and measuring our progress towards meeting those goals. The chart below details our goals, key performance indicators (KPIs) associated with each goal, and our progress to date.

2030 Travel with Purpose Goals	KPI <i>Updated each target year through 2030 to align with Hilton's Travel with Purpose Goals</i>	Progress to date
Operate through best-in-class measurement, governance, and oversight	Embed human rights in Hilton policies and governance	<ul style="list-style-type: none"> <li>• <a href="#">Human Right Principles</a> details company approach</li> <li>• <a href="#">Code of Conduct</a> includes commitment to respect human rights and to not having recruitment fees</li> <li>• <a href="#">Responsible Sourcing Policy</a> includes human rights</li> </ul>
	Provide mandatory annual training on preventing human trafficking to all hotel Team Members globally.	<p>Signs of Human Trafficking:</p> <ul style="list-style-type: none"> <li>• Our Preventing Human Trafficking Training is a required training for hotel Team Members globally.</li> <li>• In 2022, an estimated 294,000 Team Members at both our managed and franchised properties completed our preventing human trafficking training. This is based on reported completion rates of 98% at our managed properties and 70% at our franchised properties. This is an estimated 73,500 training hours.</li> </ul> <p>Modern Slavery in Labour Sourcing</p> <ul style="list-style-type: none"> <li>• From 2017 through the end of 2022, there were more than 9,000 course completions of this training by corporate and operations Team</li> </ul>





		Members, with focus on procurement roles
	100% operating hotels and pipeline countries mapped against human rights risks and information embedded in operations and development processes	<ul style="list-style-type: none"> <li>• Mapped 100% operating hotels and pipeline countries against 11 human rights risk indices.</li> <li>• Integrated Human Rights criteria in our annual internal Global Enterprise Risk Survey that is taken by more than 300 Hilton leaders</li> <li>• Conducted more than 100 country-level human rights reviews and developed action plans accordingly.</li> <li>• Developed human rights support material for owners on identified salient issues.</li> </ul>
<b>Embed ESG due diligence across our supply chain and partner with suppliers to advance positive impact</b>	100% of suppliers have received the Responsible Sourcing Policy	Policy embedded in any new contract with first tier suppliers
	Provide mandatory human rights training to all EMEA Team Members involved in labour sourcing	<ul style="list-style-type: none"> <li>• 100% of Team Members in EMEA involved in recruitment and outsourcing trained in risks of modern slavery in labour sourcing</li> </ul>
	100% of labour outsourcing agencies audited in Europe, Middle East and Africa by 2030	<ul style="list-style-type: none"> <li>• To date, 24 audits have been completed in Europe, Middle East and Africa</li> </ul>
<b>Create and partner with cross-industry networks to advance Travel with Purpose objectives</b>	Support Sustainable Hospitality Alliance human rights actions	<ul style="list-style-type: none"> <li>• Aligned internal Key Performance Indicators with the Alliance's human rights actions</li> <li>• Reference the Alliance's Forced Labour Principles in human rights support material shared with business partners (suppliers, owners)</li> <li>• Made our training on Risks of Modern Slavery in Labour Sourcing freely available to the whole industry via the Sustainable Hospitality Alliance, enabling 70 organizations to access the training from a variety of backgrounds including hotels, industry associations, airlines and NGOs.</li> </ul>
	Other partners	<ul style="list-style-type: none"> <li>• Partnered with It's a Penalty campaign to raise further awareness with Team Members, guests and other participants to the 2022 Super Bowl in</li> </ul>

Hilton

		<p>California, USA, the 2022 Commonwealth Games in Birmingham, UK.</p> <ul style="list-style-type: none"> <li>• Co-founded the World Travel and Tourism Council Anti-Trafficking Task Force</li> <li>• Supported foundational collaboration with the UK Gangmasters and Labour Abuse Authority, in partnership with the UK Stop Slavery Network Framework</li> </ul>
--	--	--

## PARTNERSHIPS AND ENGAGEMENT

Human rights risks in the travel and tourism industry are complex, and we recognise we cannot solve them on our own. Accordingly, we engage proactively with industry and expert organisations to better identify challenges, develop solutions and accelerate impact. Our engagement with industry and expert organisations complements our internal systems used to measure our progress and allows us to identify challenges faced by other organisations in the travel and industry sector.

Since 2011, we have been signatories of the [ECPAT Code of Conduct](#) to fight the sexual exploitation of children in travel and tourism, and we have been providing their Preventing Human Trafficking: Recognizing the Signs as required training for all our hotels.

To combat risks of trafficking for sexual exploitation, Hilton and the Hilton Global Foundation partnered with [Vital Voices](#) from 2013 to 2022. In 2013, we co-founded the [Global Freedom Exchange \(GFE\)](#) programme to support women leaders at the forefront of global efforts to prevent and respond to human trafficking. In 2021, Hilton provided \$150,000 in support for GFE, helping to further empower 126 anti-trafficking women advocates from 50 countries. To further build capacity for the anti-trafficking leaders, GFE fellows have the opportunity to apply for grants for their projects aiming to prevent, address and reduce human trafficking. Since

2013, Vital Voices has awarded 36 grants to Fellows’ organizations for local projects advancing the GFE mission in 21 countries around the world.

In 2022, the Hilton Global Foundation announced a donation commitment of \$500,000 toward the American Hotel & Lodging Foundation’s No Room for Trafficking’s Survivors Fund over the next three years, growing the fund by 50%. The program will equip community-based organizations with the resources they need to engage and support trafficking survivors—from direct financial support of their short-term, baseline needs to career-related support that can set them up for stability and success.

In 2016, we co-founded the [UK Stop Slavery Hotel Industry Network](#), led by Shiva Foundation, which brings together hotel brands, operators and owners. We also supported the draft and launch of the [Framework to Engage with Suppliers](#), which provides tools to help procurement teams engage suppliers to address risks of forced labour and modern slavery in the supply chain. We also supported the Network’s new [Resource Hub](#). Both resources are a first for the hotel industry.

Our President and CEO, Chris Nassetta, was the Chair of the World Travel and Tourism Council (WTTC) from 2018 through 2020. In

2018, we supported the launch of the [ECPAT/WTTC Call for Action for the Protection of Children in Travel and Tourism](#), and in 2019 we co-founded the [WTTC Anti-Trafficking Task Force](#).

We are co-founders of the [Sustainable Hospitality Alliance](#), and an active member of their Human Rights working group. Building on the launch of the Sustainable Hospitality Alliance's [Human Rights Policy Statement](#), [Human Rights Goals](#) and [Forced Labour Principles](#), we shared our internal training on Risks of Modern Slavery in Labour Sourcing with the Sustainable Hospitality Alliance. This training was available for free to all Sustainable Hospitality Alliance members throughout 2019, and became [publicly available to the whole industry at no cost](#) in December 2019.

In 2019, we participated in a hospitality working group organised by the International Labour Organization Project Office in Qatar with The Ministry of Administrative Development, Labour and Social Affairs and the Institute for Human Rights and Business to promote sustainable growth and decent work in Qatar's hospitality sector. Hilton supported the development of a new tool, [Promoting Fair Recruitment and Employment - A Guidance](#)

[Tool for Hotels in Qatar](#), which includes inputs from relevant stakeholders such as the Sustainable Hospitality Alliance. The tool includes a set of resources and practical steps that hotels can take to strengthen and implement internal policies and procedures; carry out due diligence of service providers and labour recruiters; and improve workplace relations through effective grievance handling and worker representation.

We are members of the [Global Business Initiative on Human Rights](#), a coalition that works to advance human rights in a business context through cross-industry peer learning, outreach and capacity building.

In 2019, we started our collaboration with the organization [It's a Penalty](#) to leverage the Super Bowl in Atlanta, Georgia, U.S., to continue to raise awareness about human trafficking with all participants attending the game – Team Members, guests, local stakeholders, NGOs. We continued our collaboration during the 2020 Super Bowl in Miami, Florida; 2021 Super Bowl in Tampa, Florida; 2022 Super Bowl in Los Angeles, California; 2022 Commonwealth Games in Birmingham, UK.

## OUR ONGOING COMMITMENT

As we track towards our 2030 Travel with Purpose Goals, we will focus on:

- Continuing to develop and disseminate our training programs;
- Expanding key due diligence programs in labour sourcing;
- Strengthening risk identification and due diligence processes around supply chain due diligence;
- Developing measures for assessing the effectiveness of training programs;
- Deploying risk mitigation plans for opening properties in countries where we did not previously have a presence;
- Continuing to collaborate with peers in the hospitality industry and across industries to address systemic and shared modern slavery issues; and
- Continuing to support civil society in its efforts to raise awareness of human trafficking, prevent human trafficking, and support victims of human trafficking.

Hilton is steadfast in its commitment to protecting human rights in every market in which we operate. We recognize that this is an ongoing commitment, and we will continue to update the content of this statement to reflect our continuous efforts.

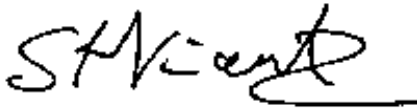
Hilton



Hilton  
HONORS

## UK MODERN SLAVERY ACT 2015

This statement was approved by the management boards of Hilton Worldwide Manage Limited and Hilton Worldwide Limited, as well as Hilton International Hotels (U.K.) Limited, Hilton HHC Limited, Hilton HIH Limited, Hilton Worldwide Holding LLP, Hilton International Entities Holding Limited, Hilton International Master Holding Limited, Hilton International IP Holding Limited, Hilton International IP Holding 2 Limited, HIC First LLC, HIC Second LLC, and Adda Hotels with respect to compliance with the reporting obligations under section 54 of the UK Modern Slavery Act 2015 for the period 1 January 2022 to 31 December 2022.



*Simon Vincent, Executive Vice President & President, Europe, Middle East & Africa; Director of the Board for Hilton Worldwide Limited (UK)*

---

### Relevant policies and resources:

- [Statement for the UK Modern Slavery Act – FY 2016](#)
- [Statement for the UK Modern Slavery Act – FY 2017](#)
- [Statement for the UK Modern Slavery Act – FY 2018](#)
- [Statement for the UK Modern Slavery Act – FY 2019](#)
- [Statement for the UK Modern Slavery Act – FY 2020](#)
- [Statement for the UK Modern Slavery Act – FY 2021](#)
- [Code of Conduct](#)
- [Human Rights Principles](#)
- [Responsible Sourcing Policy](#)
- [Annual ESG Report](#)

---

Hilton



Hilton  
—HONORS—