# HILTON OCCUPATIONAL HEALTH AND SAFETY POLICY 2024

### **OUR VISION**

At Hilton, we are a business of people serving people, and because people are at the heart of what we do, so is safety. We recognize the importance of creating a safe environment for our Team Members, guests, contractors, and other visitors. Safety requires a commitment from everyone. Each Team Member is responsible for understanding and complying with all applicable safety and health laws and guidelines. We support a proactive culture of risk management to ensure accidents or incidences of ill health remain as low as is reasonably practicable.

## **OUR RESPONSIBILITIES**

As a global company, Hilton's legal responsibilities for the safety of Team Members, guests and others varies depending on local regulations and ownership/management structures. Hilton as a management company retains responsibility for implementing occupational health and safety programs in leased and managed hotels and corporate offices, while these responsibilities sit with franchisees (separate legal entities) for franchised hotels. The management of occupational health and safety in our leased, and managed hotels and corporate offices is incorporated into everyday business practices, and we regularly measure and review performance, focusing on the development of a proactive safety culture. Hotels operate occupational health and safety ("OHS") programs relevant to their regions and local legislative requirements. We are committed to continually improving the performance of our OHS program, and corporate Safety and Security leaders meet regularly alongside hotel-based leaders to update and refine guidance, training, and procedures.

### OUR LEADERSHIP

General Managers are ultimately responsible for driving a positive safety culture in our leased and managed hotels, and some larger hotels also have dedicated safety and security teams on property to assist. Above property level, a dedicated team of regional corporate safety and security directors provides expert guidance, assistance, and auditing to help deliver on our vision. Regional Safety and Security Directors are overseen by Regional Senior Directors/Vice Presidents who in turn report into the Global Vice President of Safety and Security. At a global level, a Director of Global Safety and Compliance ensures that regional teams have the necessary guidance and training resources to deliver in their regions, and monitors accident, incident, and audit data to gauge compliance. The Safety and Security function reports into a Senior Vice President - Hilton's Chief Risk and Accounting Officer.

## **OUR 2024 PRIORITIES**

Each year the Corporate Safety and Security team prioritizes initiatives to drive occupational safety forward across the estate. Below are examples of initiatives that each region is advancing this year:

• The Americas region is relaunching a simplified and upgraded safe hands initiative aimed at reducing work related accidents through raising awareness of safe working practices.

- The EMEA region is implementing monthly educational webinars with hotels to raise awareness of safety and security resources and initiatives.
- The APAC region is implementing a serious accidents mitigation strategy.

# **CONSULTING WITH OUR EMPLOYEES**

Managed hotels and corporate offices consult with Team Members at all levels to identify safety concerns and opportunities for improvement by hosting regular Health and Safety Committee meetings. Hotel management are encouraged to take an active role in overseeing these meetings to increase engagement and help foster a strong safety culture.

# INVESTIGATION OF WORK-RELATED INJURIES, ILL HEALTH, DISEASES AND INCIDENTS

Work related injuries, ill health, diseases and incidents are investigated on property by the relevant management. Managed hotels follow internal investigation reporting requirements, which is evidenced on an incident management platform. Brand Standards require all hotels to train Team Members in safety, which assists in the prevention of work-related injuries.

# **OCCUPATIONAL HEALTH AND SAFETY PROGRAMS**

Hilton's Managed hotels operate health and safety programs tailored by region. Regional examples of components of the OHS programs are outlined below but are not exhaustive. While Hilton's Occupational Health and Safety programs are not independently certified against international standards such as ISO 45001, our programs reflect similar levels of comprehensiveness on issues such as risk management, employee consultation and legal and regulatory compliance.

### Americas

Hotels in the United States are required to operate health and safety programs that align with the requirements of OSHA. Each hotel is provided with a template safety program and is required to customize the program to address the specific safety needs of the hotel. Examples of safety programs operated by hotels include blood borne pathogens, electrical safety, hazard communication, injury prevention, machine guarding and PPE. In addition to the safety programs, hotels can access monthly safety refresher training resources to help drive home the importance of these programs. While OSHA applies only in the US, resources are also made available to hotels in the Caribbean and Latin America regions.

Separately, a 'Safe Hands' initiative is in place to help guide hotels in reducing accidents. The Safe Hands initiative includes scorecards for evaluating the safe performance of hazardous tasks such as moving a housekeeping cart, alongside additional training resources.

Job safety analysis sheets are provided for hazardous activities such as lifting heavy objects, welding, and window cleaning. These sheets contain detailed step-by-step guidance on how to perform a hazardous task safely, thereby reducing risk to the Team Member and others in the vicinity.

Departmental job safety training packs have been produced to guide hotels through the process of inducting and training Team Members. These packs (examples include Culinary, Engineering, Laundry, etc.) are developed with the

Team Member's safety in mind and ensure proper training and instruction has been provided for regular tasks.

Hotels are provided with checklists to self-assess their compliance with various safety requirements. Checklists include ladder inspections and pool water quality checks, among other tasks. Checklists help hotels identify potential hazards and reduce risk.

### Europe, Middle East & Africa, and Asia Pacific

With more than 100 countries represented outside the Americas, exact occupational health and safety programs are influenced by local regulations, but an overarching 'Health and Safety Manual' is in place to guide managed and leased hotels through the requirements for keeping Team Members and Guests safe. The Safety Manual -- available in multiple languages -- is extensive, but examples of content include working at height, manual handling, chemical safety, electrical safety, and slips, trips and falls. The manual contains a variety of guidance, checklists and appendices that enable hotels to apply the content directly to their properties.

In addition to the safety manual, hotels are provided with a suite of Safe Systems of Work. Safe Systems of Work are provided for hazardous activities such as chemical dosing, cleaning bodily fluid spills, and using ladders. They contain detailed step by step guidance on how to perform a hazardous task safely, thereby reducing risk to the Team Member and others in the vicinity.

Where required by local law (such as in the UK), hotels conduct workplace safety risk assessments. These assess the likelihood and severity of injury occurring due to the tasks typically conducted across the operation. Hotels then implement corrective control measures where required, to ensure a satisfactory level of residual risk. Risk assessments also help to monitor the effectiveness of control measures.

Department specific eLearning courses are available in multiple languages. These bespoke Hilton courses educate Team Members on the common hazards associated with their departments and give comprehensive safety advice on how to stay safe and avoid injury to themselves and others. Examples of these eLearning courses include Kitchens Safety, Food and Beverage Safety, and Housekeeping Safety.

Quarterly audits are provided for hotels to self-assess their compliance with the contents of the safety manual. These audit requirements align with the control measures identified in risk assessments. 21 separate audits are provided to cover all aspects of hotel operations, and include examples such as fitness center, kitchen, car park and conference and events.

Team Members in all regions have access to the School of Safety and Security – our one-stop location for all safety training, available in multiple languages, and containing 11 hours of safety and security related content.

## GOVERNANCE

At a corporate level, managed and leased hotels receive periodic safety and security reviews (audits) by their Regional Safety and Security Director. These reviews provide an opportunity for the regional director to identify areas for improvement and to assess compliance with the occupational safety programs. Hotels are selected for audit by taking a risk-based approach. Audits facilitate the prioritization of remedial actions and result in action plans which hotels are required to complete. An escalation process enables auditors to raise any major concerns with senior regional leadership (Area Operations Vice President) and Corporate Safety and Security leadership (Regional Safety & Security Senior Director/Vice President). A customized audit platform is used to capture audit actions and ensure completion. Audits are a key tool for evaluating progress in reducing/preventing health issues/risks against quantified pass marks/targets at audit.

Managed and Leased hotels report accidents into corporately managed reporting systems, from which trend analysis is performed to identify areas of focus and further mitigation.

An independently operated hotline is available for Team Members at Corporate, Managed and Leased locations to report any code of conduct concerns, which may include unsafe practices.

Further to safety and security audits, hotels are inspected by Quality Assurance auditors who verify the completion of mandated safety training requirements such as health and safety, CPR, emergency procedures and fire safety, food safety and sanitation, and preventing human trafficking. These mandated requirements apply to franchised hotels in addition to managed and leased hotels globally.

All corporate members of the Hilton Safety & Security Team (in addition to certain hotel Safety & Security Directors, dependent on hotel location and size) are certified or qualified in appropriate safety standards applicable to their regions. Examples include:

- Americas OSHA 501: Trainer Course in Occupational Safety and Health Standards for General Industry, the highest certification individuals can receive for private sector OSHA training.
- EMEA NEBOSH Diploma in Occupational Health and Safety Management, BSc or MSc in Environmental Health.
- APAC Singapore National Occupational Safety and Health and Business Continuity (BCLE2000).

Safety and Security processes and programs are periodically verified where necessary, by third parties. Examples include:

- United Kingdom A primary authority arrangement with a local government body ensures safety guidance produced by the UK corporate safety team is in line with local legislative requirements.
- USA A legal firm Jackson Lewis periodically assesses the Americas OHS programs to ensure they are compliant with OSHA requirements.
- Globally Third party food hygiene inspections conducted by Ecosure and Diversey help verify food hygiene standards in kitchens.

The refinement and verification of our occupational health and safety procedures is further aided by the connections our global and regional Safety and Security corporate leaders have with peers across the industry. Such connections enable the sharing of best practice and often involve feedback directly to lawmakers. One such example is the involvement of the UK Regional Safety & Security Director on the UK Health and Safety Executive Hospitality Liaison Forum.

# TRAVEL SAFETY

As a major global company, many corporate Team Members and hotel managers are required to travel internationally as part of their roles. Hilton operates a comprehensive

duty of care program with its partner Global Guardian. This program ensures all international travellers have access to pre travel advisories, country risk ratings, and expert travel safety advice. All international travellers are required to complete bespoke Hilton international travel safety eLearning, which addresses a wide range of safety, security, medical and emergency procedures. Team Members have access to a Global Guardian mobile app which geolocates them during their travels and contains important safety features such as a panic button. Hilton also works closely with travel booking platforms to verify safe airlines and routes.