

HILTON SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial Year 2023

This statement is published by Hilton, in compliance with the UK Modern Slavery Act 2015. It details the actions taken by Hilton to identify and prevent modern slavery and human trafficking in all parts of its business and supply chains across its global operations during Financial Year 2023.

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 International Entities Holding Limited, Hilton International Master Holding Limited, Hilton International IP Holding Limited, Hilton International IP Holding 2 Limited, Adda Hotels, Hilton Worldwide Services Limited, Hilton Worldwide Holding LLP, HIC First LLC, and HIC Second LLC, 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", "we," "us" or "our".

OUR COMMITMENT TO HUMAN RIGHTS

At Hilton, we have a shared purpose to drive responsible travel and tourism globally. 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 approach to human rights is informed by the United Nations Guiding Principles for Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

OUR BUSINESS STRUCTURE

Hilton is a global hospitality company with a portfolio of 22 brands comprising more than 7,500 properties with nearly 1.2 million rooms in 126 countries and territories as of December 31, 2023, supported by more than 460,000 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 reported as a segment based on (a) delivering a similar set of products and services and (b) being managed separately given its distinct economic characteristics. The management and franchise segment includes all of the hotels we manage for third-party owners, as well as all franchised hotels that license our intellectual property, including our brand names, trademarks and service marks, and to which we provide other contracted services, 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 and employment.

As of December 31, 2023, Hilton employed or managed approximately 178,000 individuals at our owned, leased and managed properties¹ and our corporate offices. We refer to these individuals below as “Hilton Employees.” The individuals who are employed by the owners (or their designees) of franchised properties are referred to below as “Franchise Employees.” There are approximately 288,000 Franchise Employees who work on-property at independently owned and operated franchise properties in the Hilton portfolio. We refer to both Hilton Employees and Franchise Employees collectively as “Team Members.”

This chart depicts the number of Hilton properties by type and as a percentage of the Hilton enterprise as of December 31, 2023:

	Owned / Leased / Joint Venture	Managed	Franchised / Licensed	Total
Operating properties	51	800	6,679	7,530
Share of total operating properties	0.7%	10.6%	88.7%	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 17,000 properties across the world, including more than 7,000 non-Hilton branded hotels and more than 1,500 non-hotel businesses. 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 food and beverage, property operations, 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 energy includes establishing programs that secure bids from energy suppliers to achieve favorable terms on the purchase of electricity, natural gas, renewables, and other energy sources and subsequently reduce the associated cost and carbon footprint, while 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, and our own internal due diligence process to assess third parties’ practices with respect to human rights. We

¹ Certain individuals at managed hotels are employed by the hotel owner and managed by Hilton

require identified suppliers within select regions to respond to a human rights questionnaire. We also require suppliers to acknowledge 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 the risks of 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. Our Code of Conduct and Human Rights Principles apply to all Hilton Team Members, while our Responsible Sourcing Policy outlines the minimum ESG standards we require of our suppliers. These policies 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 as a resource on Hilton's business principles. We also encourage them to develop their own policies and procedures for their 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 are also shared with all owners and suppliers during Legal Compliance's Due Diligence Process.

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

Hilton's efforts on human rights are part of our overall Environmental, Social and Governance (ESG) strategy, [Travel with Purpose](#). Our Board of Directors works with the business to set Hilton's strategic direction and ensure the business is managed ethically and responsibly. Our Executive Committee approves major ESG programs and receives at least quarterly updates on our ESG programs and progress towards our 2030 Goals. The Nominating & ESG Committee, one of the three standing committees of Hilton's Board of Directors, also receives quarterly reports on this progress, reviews and assesses our related strategy and makes recommendations to the Board and management as appropriate. The Board of Directors also receives annual updates on progress towards our 2030 Goals.

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 could be at risk 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.

To evaluate human rights risks in our operations, we map more than 10 external human rights risk indices against our operating properties. These indices by Verisk-Maplecroft – a global risk and strategic consulting firm – cover issues such as child labour, forced labour, indigenous people's rights, freedom of assembly and access to remedy. Using the same risk indices, we also conduct a human rights risk review whenever we look to open new properties in countries where we do not yet operate.

Based on data from these human rights risk indices, we estimate 16.1 percent of properties in our portfolio are located in countries or regions with higher risks of modern slavery.

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

Our dynamic risk identification and continuous monitoring processes help inform our approach to human rights 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 is also 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 review and 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

Leased and managed hotels are required to escalate potential situations of modern slavery to the corporate Safety and Security team. The Safety and Security team triages each matter, involving all necessary stakeholders to respond appropriately. Identified trends inform our 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 within 90-days of hiring and on an annual basis (see relevant sections below). The process is managed by the ESG, Legal Compliance, Corporate Learning and Human Resources teams, with the support of Safety and Security. A list of signs to identify risks of human trafficking for sexual exploitation and forced labour is required to be 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 resources and trainings with franchised hotels via our internal corporate website. We also monitor evolving state, regional, and national legislation relating to trafficking to ensure compliance with all rules and regulations.

Orphanage Tourism: We recognize “orphanage tourism” may take place in certain countries where we operate. We provide resources for our hotels to educate them on the issue and remind them not to offer or promote any tour that would include orphanages.

Safe And Ethical Recruitment: We understand unscrupulous organizations may use the Hilton name to fraudulently recruit individuals and we specifically warn against [recruitment fraud](#) on our careers website. 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 undergo deeper due diligence as appropriate. The process is managed by the HSM and the ESG teams.

We use a labour sourcing management process for our leased and managed hotels in Europe, 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. 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 also strengthened 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.

4) Development and construction

We carry out due diligence reviews 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.

OUR DUE DILIGENCE PROCESSES – TRAINING AND AWARENESS

We signed [The Code](#) (formerly known as the ECPAT Code of Conduct) 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. The training course, '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 also includes a section on human rights and is mandatory for all Hilton Team Members.

In addition to these trainings and awareness efforts, other notable training events in 2023 included:

Human Trafficking Training around Major

Events: Our Safety and Security teams and external partners routinely train hotel Team Members in-person on identifying and combatting human trafficking on a risk basis, such as during major events. In 2023, we provided training to hotel teams to mitigate risks of human trafficking during the Formula 1 race in Florida and the Super Bowl in Arizona, in partnership with It's a Penalty. The non-governmental organization, which works to end abuse, exploitation, and human trafficking, has been our partner since 2019.

Development: Through our new country development process, 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.

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 is mandatory for all Hilton Employees in EMEA who are key decision-makers in recruitment and outsourcing decisions (i.e., General Managers, Human Resources, Procurement, Finance). From 2017 through the end of 2023, we achieved more than 9,200 course completions for 'Risks of Modern Slavery in Labour Sourcing' 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.

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 aims to support industry players to identify and mitigate those risks.

Performance Indicators

We recognize the importance of tracking and measuring the progress towards meeting our goals to mitigate modern slavery, forced labour, and human trafficking risks in our operations. The chart below details our goals, key performance indicators (KPIs) associated with each goal, and our progress to date.

2030 Travel with Purpose Goal	KPI	Progress to date
Operate through best-in-class measurement, governance, and oversight.	Embed human rights in Hilton policies and governance	• Human Right Principles details company approach. • Code of Conduct includes commitment to respect human rights and to prohibit employees or contractors from paying recruitment fees. • Responsible Sourcing Policy includes human rights commitments for our suppliers.
	Provide mandatory annual training on preventing human trafficking to all hotel Team Members globally	Signs of Human Trafficking: • ‘Preventing Human Trafficking: Recognizing the Signs’ is a required training course for hotel Team Members globally. • In 2023, an estimated 407,000 Team Members at both our managed and franchised properties completed our training on preventing human trafficking. This is based on reported completion rates of 99% at our managed properties and 92% at our franchised properties. This is an estimated 101,750 training hours. Modern Slavery in Labour Sourcing: • From 2017 to 2023, there were more than 9,200 course completions of our ‘Risk of Modern Slavery in Labour Sourcing’ training course by corporate and operations Team Members, with focus on procurement roles.
	Map operating hotels and pipeline countries against human rights risks and information embedded in operations and development processes	• Map more than 10 external human rights risk indices against our operating hotels to evaluate human rights risks in our operations. • Conduct a human rights risk review whenever we are seeking to open properties in a new country where we do not yet operate. We have completed close to 100 country-level human rights reviews and developed action plans accordingly. • Integrated human rights criteria in our annual internal Global Enterprise Risk Survey completed by more than 300 Hilton leaders. • Developed human rights support material for owners on identified salient issues.

Embed ESG due diligence across our supply chain and partner with suppliers to advance positive impact.	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	• Training on 'Risks of Modern Slavery in Labour Sourcing' made available to all TMs and is mandatory for all Hilton Employees in EMEA directly involved in recruitment and outsourcing (i.e., General Managers, Human Resources, Procurement, Finance). • More than 9,200 course completions were logged from Corporate and Operations Team Members, with a focus on procurement roles (2017-2023).
Create and partner with cross-industry networks to advance Travel with Purpose objectives.	Support Sustainable Hospitality Alliance human rights actions	• Made our training on 'Risks of Modern Slavery in Labour Sourcing' freely available to industry via the The Alliance.
	Other partners	• Partnered with It's a Penalty campaign to raise awareness with Team Members, guests and other participants to the 2023 Super Bowl in Arizona and the Formula 1 race in Florida. • Contributed to the American Hotel and Lodging Association (AHLA) Foundation's No Room For Trafficking program in 2022 which unites the hotel and lodging industry around collective anti-trafficking efforts.

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 Code (formerly known as the ECPAT Code of Conduct) to fight the sexual exploitation of children in travel and tourism, and we have been providing their course, 'Preventing Human Trafficking: Recognizing the Signs', as required training for all our hotels.

In 2023, Hilton co-founded the [Hospitality Alliance for Responsible Procurement \(HARP\)](#) with peer hospitality companies. Powered by EcoVadis, HARP aims to bring together hospitality companies committed to improving the sustainability performance of hospitality suppliers, including on human rights.

In 2022, the Hilton Global Foundation announced a donation commitment of \$500,000 toward the AHLA Foundation's No Room for Trafficking's Survivors Fund over the next three years, growing

the fund by 50% at the time. 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.

We are co-founders of the [Sustainable Hospitality Alliance](#), and a 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 made [publicly available to the whole industry at no cost](#) since December 2019.

In 2019, we started our collaboration with the organization [It's a Penalty](#) to leverage the Super Bowl in Atlanta, Georgia, to continue raising awareness about human trafficking with all participants attending the game – Team Members, guests, local stakeholders, NGOs, etc. 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; Formula 1 race in Florida and 2023 Super Bowl in Phoenix, Arizona.

OUR ONGOING COMMITMENT

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

- Continuing to update 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;
- 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 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 the markets 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.

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 International Entities Holding Limited, Hilton International Master Holding Limited, Hilton International IP Holding Limited, Hilton International IP Holding 2 Limited, Adda Hotels, Hilton Worldwide Services Limited, Hilton Worldwide Holding LLP, HIC First LLC, and HIC Second LLC with respect to compliance with the reporting obligations under section 54 of the UK Modern Slavery Act 2015 for the period 1 January 2023 to 31 December 2023.



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

Relevant policies and resources:

1. [Statement for the UK Modern Slavery Act – FY 2016](#)
2. [Statement for the UK Modern Slavery Act – FY 2017](#)
3. [Statement for the UK Modern Slavery Act – FY 2018](#)
4. [Statement for the UK Modern Slavery Act – FY 2019](#)
5. [Statement for the UK Modern Slavery Act – FY 2020](#)
6. [Statement for the UK Modern Slavery Act – FY 2021](#)
7. [Statement for the UK Modern Slavery Act – FY 2022](#)
8. [Code of Conduct](#)
9. [Human Rights Principles](#)
10. [Responsible Sourcing Policy](#)
11. [Annual 2023 ESG Report](#)