

POLICY

Child Labour and Forced Labour Policy

Introduction

Kempinski is adopting a Child Labour and Forced Labour policy following the principles of the International Labour Organisation (ILO) and the U.N. Convention on the Rights of the Child, to confirm the Company's continued commitment to stopping the employment of individuals aged 18 or less. This policy delivers a clear interdiction of using forced labour or engaging in exploitative working conditions and practices. At Kempinski, we believe that it is part of our social responsibility to engage in fair, legal and equitable employment practices in all the countries where we operate.

Policy Statement

Kempinski is fully committed to acting and conducting business within a legal and ethical framework and respecting the guidelines of the International Labour Organization (ILO) and the U.N. Convention on the Rights of the Child.

Kempinski does not condone child labour or forced labour practices in any way, shape or form, and refuses any association with entities that engage in such practices.

Scope

This policy is strictly applicable to all Kempinski Hotels and Residences worldwide as well as Corporate and Regional Offices. Moreover, Kempinski expects that its business partners and supply chain (vendors, contractors, etc.) uphold this policy and abide to the practices and laws applicable in the countries where they operate.

Definitions

Child Labour:

ILO defines "Child Labour" as "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work."

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Forced Labour:

ILO defines "Forced Labour" as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."

Policy Content

- Kempinski strongly believes that all children around the world have the right to live a healthy life and receive education, and strictly forbids the employment of juveniles under the age of 18 years, notwithstanding any local laws or regulations in the markets where it operates.
- Without prejudice to the rules set in this policy, Kempinski may associate with individuals aged 18 or less to support various educational requirements that these children may have. This will be done via apprenticeships, internships or work-experience schemes, in coordination with the individuals' schools, and all the terms of these programmes, such as number of working hours, days off, working conditions, etc., will follow the legal requirements applicable in the respective country and will be in line with the ILO and UN standards mentioned above.
- Moreover, Kempinski strongly believes that any individual working or providing services to the company must do so at their free will, without any type of coercion, and be compensated according to agreed terms that are in line with the local legal regulations. Kempinski is strictly against any form of employment exploitation.
- When hiring new employees, all relevant details pertaining to employment, such as age, identity, and social security must be checked via official documentation to ensure that the person considered for hiring is 18 years or older.
- In the event of child labour or forced labour occurrence, hired directly by our hotels, residences or legal entities of the Kempinski corporate group, the employment of the child / employee will be terminated with immediate effect.

At the same time, an internal investigation will be conducted to understand the circumstances of the hiring; if there is evidence that the policy has been intentionally breached, adequate disciplinary measures, that could include termination of employment, will be taken against the concerned individual(s).

- Kempinski will not associate knowingly, with any entities or organisations using child labour or forced labour. To this extent, Kempinski is communicating the company's policy to all its business partners and supply chain, making it a contractual obligation to not use child or forced labour. Business partners and supply chain must be audited regularly to ensure they are not using child or forced labour.

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In the event of an occurrence of child or forced labour from business partners or supply chain, Kempinski is committed to discontinue the business collaboration with the concerned entity(ies) and may report its findings for further investigation to the local authorities in line with local laws and regulations.

- Kempinski has zero tolerance for intentional breach of this policy.

Kempinski is committed to creating awareness regarding child labour and forced labour to its employees by ensuring relevant training takes place.

Kempinski is committed to communicating this policy to its business partners and suppliers and endeavours to ensure the contracts / service agreements with contracting parties and supply chain include provisions allowing Kempinski to enforce this policy.

Responsibility

It is the responsibility of the local management team and Human Resources department to ensure this policy is fully implemented.

It is the responsibility of every employee to report cases of suspected child or forced labour.