Human Rights Strategy Statement

I. Introduction

We recognise our responsibility to ensure sound social, ethical, and environmental practices within our operations and across our supply chain.

Premier Inn Holding GmbH, the holding company of the Premier Inn hotel operations in Germany, is part of the Whitbread Group, headquartered in Dunstable, United Kingdom. As Whitbread's German Premier Inn business, we are committed to fulfilling the human rights and environmental due diligence obligations pursuant to the German Supply Chain Act (GSCA). We are working closely together with our UK shareholder to ensure a thorough implementation of the legal obligations in an internationally operating group structure.

Aligned with the UN Guiding Principles on Business and Human Rights, the GSCA and the UK Modern Slavery Act we acknowledge our responsibility to respect the human rights of our workforce and every worker in our supply chain. Every worker has the right to live with dignity, work in a safe environment, and earn fair wages. We take our role in ensuring these rights seriously, understanding that when workers are treated with respect and work in humane conditions, they, and the companies they work for, benefit from greater commitment and productivity.

This Human Rights Strategy Statement outlines our commitment to detecting and addressing human rights and environmental risks within our supply chain and business operations. The principles outlined here, along with our Code of Conduct and our Responsible Sourcing Policy, guide our operations. These documents represent a baseline standard, not the maximum, and we are committed ourselves and encourage our partners to exceed these standards whenever possible.

II. Supply Chain

Risk Analysis and Risk Management

We conduct annual and (if necessary) ad-hoc human rights and environmental risk analyses of our supply chain. These assessments consider both the country of operation and the associated sector risk of our suppliers. Our methodology uses open-source datasets and internal data to generate a comprehensive and objective risk score for each country, sector, and supplier. The results of the risk analyses are communicated to and reviewed by management regularly and (if required) on an ad hoc basis.

Based on the results of our risk assessment, we are prioritising labour rights to ensure we maintain the highest standards of fair treatment, safety, and respect for workers. Our commitment to safeguarding labour rights is integral to our approach to responsible business practices.

Before they are onboarded, suppliers must accept our Responsible Sourcing Policy and any relevant policies related to specific materials being procured. Our Responsible Sourcing Policy aligns with ILO conventions, the ETI Base Code, and the GSCA requirements to ensure

its robustness. We regularly monitor and assess our suppliers' adherence to our Responsible Sourcing Policy.

In addition, we have implemented a "banned countries list" within our contract management platform, which includes countries from which we do not source products directly or indirectly. Compliance with this list is mandatory for both tendering and contract renewal. The list is reviewed annually, and countries are selected based on high levels of associated risk, where human rights safety cannot be assured despite best efforts.

After assessing the inherent and actual risk of suppliers, we verify whether they have up-to-date SMETA audits (or equivalent ethical audits) in place. Where audits are absent, we work with suppliers to implement them where necessary.

Recognising local socio-economic, cultural, and traditional constraints, we are committed to collaborating with suppliers to address and mitigate detected human rights or environmental breaches. For this purpose, our standard supplier contracts included collaboration obligations to address, eliminate, or minimise any adverse effects caused by the supply of products or services to human rights or the environment. We reserve the right to terminate relationships with suppliers who fail to meet our standards and do not collaborate to remedy or reduce breaches or risks.

III. Own Business Operations

Risk Analysis and Risk Management

As a hotel operation business with hotels in Germany, we have implemented processes and structures that are aimed at ensuring compliance with laws and regulations applicable to our employees and hotels in Germany. We are committed to providing a work environment in which our employees and guests feel respected and safe.

Our Health, Safety & Security Department monitors health, safety & security concerns, with the department head informing the management of incidents monthly, enabling us to detect and address swiftly any issues in this area.

Our People Department monitors compliance with national and local laws and regulations relevant to our workforce with the department head working closely with the Managing Directors in the Germany Operating Committee, thus ensuring due consideration of human rights in management decisions. We believe in equal opportunities for all, with no barriers to entry and our People Department is committed to creating an environment where our workforce can feel this way.

All our employees are expected to adhere to and apply the principles outlined in our Code of Conduct in their day-to-day work and we have implemented regular mandatory relevant training across our hotel operations and the support centre.

Through our whistleblowing hotline we encourage our employees to report potential breaches of laws or internal policies.

It is our commitment to achieve the implementation of this Human Rights Strategy Statement across all business operations. We will continue to implement and improve internal processes across all support centre functions and hotel operations to be able to effectively detect human rights and environmental risks and breaches enabling us to appropriately address these.

IV. Complaints Procedure

We have implemented a complaints procedure that allows our employees as well as business partners, including suppliers, service providers, customers, and other third parties, to report human rights or environmental risks and violations in our supply chain or business operations.

The <u>Rules of Procedure</u> for such complaints procedure are published on our Website. As further described therein complaints can be submitted through our third-party operator, Safe-call Ltd, via the website <u>www.safecall.co.uk/whitbread</u> or via phone. Anonymous complaints are also accepted. We have implemented an internal responsibility and process matrix to ensure a swift review and investigation of complaints. To ensure efficiency, the effectiveness of this reporting channel is regularly reviewed and subject to internal audit.

V. Documentation and Reporting

In line with legal requirements, we commit to:

- Conduct annual and ad-hoc reviews of relevant risks and risk management processes, as well as our complaints procedure and this Human Rights Strategy Statement.
- Document compliance with our obligations and retaining records for seven years.
- Publish and file an annual report.

The effectiveness of the above-described processes is continuously reviewed and adapted by way of collaboration between the German and UK Whitbread teams, as required, taking into account detected risks. In addition, the German management has specifically created the role of ESG Manager Germany to supervise relevant risk management processes.

Premier Inn Holding GmbH

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