



FOUR SEASONS

## FOUR SEASONS HUMAN RIGHTS POLICY

Updated 18 March 2022

### INTRODUCTION

Four Seasons Hotels and Resorts (“**Four Seasons**” or the “**Company**”) is committed to respecting human rights in each and every one of the markets in which we operate. As a responsible company, we believe that our goals, beliefs, and principles are the foundation of the work that we do every day. We are committed to complying with the laws and regulations of the countries and jurisdictions in which we operate, and implementing best practices for managing human rights risks in our operations and our supply chain.

As of year-end 2021, Four Seasons manages 122 hotels and resorts and 48 residential properties in major city centres and resort locations in 47 countries, with more than 50 projects under planning or development. The hotels and residences managed by Four Seasons engage over 43,500 individuals globally (“**Field Colleagues**”). Field Colleagues are employed by the owners of the hotels and residences, rather than Four Seasons. Four Seasons employs around 600 own staff across our corporate offices, hotels, and residences (“**Corporate Colleagues**”).

Our approach to human rights is informed by the principles contained in the *Universal Declaration of Human Rights*, the *International Labour Organisation (ILO) Standards*, the *UN Guiding Principles on Business and Human Rights*, the *UN Global Compact*, and the *Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD)*. The *Four Seasons Human Rights Policy* reflects the Company’s commitment to conduct its business in a manner consistent with these principles and to respect human rights within the Company’s sphere of influence. Where local human rights laws exceed the requirements of these international human rights instruments, Four Seasons will abide by the requirements of local human rights laws in the jurisdictions where these apply.

Four Seasons is committed to demonstrating global leadership in responsible workplace practices, and conducting our business operations in a manner that avoids complicity in human rights abuses. The Company strives to ensure that our business operations do not impact basic human needs such as access to food, water, sanitation, or the healthcare of local communities. Our culture embodies a commitment to ethical business practices and good corporate citizenship.

Our commitment to respecting human rights applies globally to all aspects of Four Seasons business operations. We require all Corporate Colleagues to abide by the principles outlined in this policy. In addition, we expect Field Colleagues, our suppliers and their employees, contractors, and business partners to abide by the principles outlined in this policy and our *Supplier Code of Conduct*. For clarity, this policy does not substitute or supplant the individual obligation of all suppliers, employees, contractors, and business partners to comply with their own obligations as may arise under any applicable local laws, independently of and in addition to this policy.

## **OUR COMMITMENT**

### **Ethical business conduct**

Four Seasons requires that our business be conducted with honesty and integrity, and in compliance with all applicable international human rights norms and local laws. Our *Code of Business Conduct and Ethics* establishes clear ethical standards for how we do business. Corporate Colleagues and Field Colleagues are required to complete annual training on our Code.

### **Responsible sourcing**

Four Seasons is committed to responsible sourcing practices. Our *Supplier Code of Conduct* sets out principles and expectations as to how organizations who supply goods and services to Four Seasons are expected to conduct business. Our *Supplier Code of Conduct* confirms that our suppliers are expected to comply with this *Human Rights Policy* and the commitments set out in it.

### **Forced labour**

Four Seasons works to ensure that forced labour in all its forms, as defined by the International Labour Organization (ILO), is prevented from occurring as a result of our business activities. This includes modern slavery, practices similar to slavery, bonded labour and debt bondage, trafficking in persons, prison labour, compulsory labour, military work, unlawful recruitment of children, and domestic servitude. We are also committed to ensuring protection for those categories of worker who are most vulnerable to exploitation.

We fully endorse the [Sustainable Hospitality Alliance's Principles on Forced Labour](#), namely that:

- Every worker should have freedom of movement;
- No worker should pay for a job; and
- No worker should be indebted or coerced to work.

### **Human trafficking**

Four Seasons works to ensure that human trafficking in all its forms is prevented from occurring across our operations, in line with the *UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children*. A training and awareness program has been developed for Colleagues to be able to identify and report suspected instances of human trafficking. All Field Colleagues are expected to undertake equivalent training on an annual basis.

To mitigate instances of human trafficking, and as part of our commitment to employee and guest safety, Four Seasons has pledged support to the American Hotel and Lodging Association (AHLA) *5-Star Promise*, a voluntary commitment by AHLA members to enhance policies, trainings, and resources to strengthen safety and security for Four Seasons Corporate Colleagues, Field Colleagues, and guests.

## **The rights of children**

Four Seasons works to ensure that exploitation of children in any form does not take place in its business operations. The Company is committed to complying with all applicable local laws for the protection of children's rights, not recruiting child labour, and supporting the elimination of all forms of exploitative child labour, as defined by the International Labour Organisation and requires Corporate Colleagues to adhere to this commitment. We expect Field Colleagues to share this commitment.

## **Prevention of sexual exploitation**

Four Seasons abides by and supports laws and measures to prevent and punish the crime of sexual exploitation against children and adults, and supports the enactment of further laws and legislation in that respect.

Four Seasons will work to raise awareness concerning such exploitation and will cooperate with law enforcement authorities as and where required by applicable local laws should the Company become aware of any such instances of sexual exploitation.

We require Corporate Colleagues to adhere to these commitments and expect Field Colleagues to share this commitment.

## **Freedom of association and collective bargaining**

Four Seasons respects rights to freedom of association and collective bargaining, in accordance with the requirements of applicable local laws.

Four Seasons Corporate Colleagues have the right to organize or join associations, and bargain collectively, if they so choose and to the extent that such rights are exercised in a manner consistent with local laws. Four Seasons encourages our business partners and suppliers to adhere to this commitment.

## **Health and safety**

Four Seasons is committed to the health and safety of our guests, Corporate Colleagues, Field Colleagues, and business partners. The Company is committed to complying with all occupational health and safety laws and does not tolerate violent conduct or threats of violence among or towards our Corporate Colleagues and Field Colleagues.

## **Diversity, Inclusion and Belonging**

Four Seasons promotes and embraces diversity in all aspects of our business operations. We support and uphold the elimination of discriminatory employment practices.

We are committed to creating an environment of inclusion and equal opportunity for all people regardless of their race, ancestry, place of origin, color, ethnic origin, disability, creed, sex, sexual orientation, gender identity, same-sex partnership, age, immigrant status, political affiliation, religious affiliation, socioeconomic status, and trade union or workers association affiliation including without limitation any prohibited grounds of discrimination as defined by local

laws. We believe inclusion and diversity are required to create true belonging. We must do more than welcome diversity, we must create an environment of inclusion, and foster a sense of belonging for our people.

We commit to non-discrimination and fairness in all labour practices and through all aspects of the employment relationship, including but not limited to, recruiting, selection, training, development, transfers, promotions, performance management, discipline, compensation, benefits, separation, and all other matters of employment. These commitments are further described in our *Workplace Violence, Workplace Harassment and Discrimination Policy*.

We require Corporate Colleagues to adhere to these commitments, and expect Field Colleagues to share this commitment.

### **Coercion**

Four Seasons does not tolerate coercion at any point in the employment process – during the recruitment phase, term of employment or post-employment, in alignment with International Labour Organisation principles.

We require Corporate Colleagues to adhere to these commitments, and expect Field Colleagues to share this commitment.

### **Violence and harassment in the workplace**

Four Seasons will not tolerate workplace violence or workplace harassment of any kind, as set out in the Company's *Workplace Violence, Workplace Harassment and Discrimination Policy*. To further our commitment in this area, Four Seasons is a signatory to the *AHLA 5-Star Promise*, to strengthen safety and security for Four Seasons Corporate Colleagues, Field Colleagues, and guests.

## **GOVERNANCE**

The Four Seasons *Human Rights Policy* is a component of our company's commitment to Environmental, Social and Governance (ESG).

The ESG Committee of our Board of Directors advises and guides the company on our ESG programs. The ESG program is overseen by the ESG Steering Committee, which is comprised of members of the company's Executive Leadership Team.

This *Human Rights Policy* is reviewed and, if necessary, updated annually. It should be read in conjunction with the following Four Seasons policies:

- *Workplace Violence, Workplace Harassment and Discrimination Policy*
- *Code of Business Conduct and Ethics*
- *Supplier Code of Conduct*
- *Environmental Policy*

**The Four Seasons Board ESG Committee approved this statement on 18 March 2022.**