

WHITBREAD PLC

The way we work at Whitbread

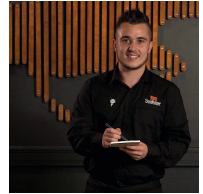
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Business Practices and
Standards of Behaviour
UK Version 2019

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Chief Executive**

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Dear Colleagues,

I'm tremendously proud to be part of Whitbread, one of the UK's most successful companies with a unique heritage.



It's our people who make our business great. Every day, our teams do a fantastic job serving millions of customers across our different brands. Their incredible passion, and our business philosophy, is captured in our Customer Heartbeat model. Together with our values, it forms the bedrock of our business.

As with any company, our reputation is built on trust; the trust of our customers, our people, our partners and suppliers, our investors and the communities we serve. Trust is hard to win, but easy to lose. Creating a culture where people trust, respect and look out for each other requires everyone to work and behave according to the highest standards.

Our business conduct matters to me. Doing the right thing is sometimes obvious and sometimes it's not. This statement of our business practices and standards of behaviour is designed to help give you guidance to deal with situations when it's not always obvious what is the right thing to do. It explains what to do if you spot something that you feel is unethical, dishonest or unacceptable, and could be putting other people or our business at risk. We cannot describe every situation you may come across but it's important you fully understand our values, business practices and standards of behaviour so that you can apply them to any situation.

Everyone that works at Whitbread has a part to play in upholding our values and protecting our brand and reputation. I urge you to speak out if you see or hear of anything which doesn't follow or meet our high standards. If you are in any doubt, please ask your line manager or you can also call the Speaking Out helpline.

By following these practices and standards we can all support each other, maintain the trust of our customers and build an even better business.

Kind regards,



Chief Executive

Our Customer Heartbeat

We will grow brands that customers love by building a strong customer heartbeat and innovating to stay ahead. Our winning teams delight customers so they come back time and again which, along with our focus on everyday efficiency, drives profitable growth. We are passionate about being a force for good in our communities, helping everyone to live and work well.

We place the customer at the heart of everything we do.



Our Values

It's not just about what we do, it's how we do it. Our behaviour is what people see and we will strive to create a culture that reflects the highest standards of behaviour, based on our core values and each one of us takes personal responsibility for it.

Genuine
Caring about
our customers
and teams



We are true to ourselves and honest to others. We make customers and teams feel special. We do good in the community

Confident
Determined to
be the best



We welcome change and new ways of doing things. We appreciate that feedback is important. We speak up when there's a better way

Committed
Passionate
about delivery



We step up to get things done. We work well with others. We are always looking to improve the customer experience.

About our Business Practices and Standards of Behaviour

It's not always obvious what's right or what's legal in any given situation. This guidance provides an overview of some of the standards each team member is expected to respect every day.

You can find our supporting policies on the 'Employee Relation Policies' page on the intranet. They give you more detail in various areas, ranging from human rights and diversity, to data privacy and information security.

If you want to be sure that what you're doing or planning to do is appropriate, then use this document and our supporting policies to guide you.

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If you're not sure about something, ask yourself these key questions before you act:

1.

Is it consistent with Our Values, Standards and any applicable law or regulation?

2.

Would your approach embarrass you or Whitbread?

3.

How would your approach look if published in the newspaper or online?

4.

Would you be comfortable with the example it sets for future decisions?

You can deliver great customer experiences and conduct business with integrity knowing that Whitbread supports you in doing the right thing.

You play a critical role in protecting our values, our brands and our reputation and in ensuring that Whitbread has a great work environment.

If you are unsure of what to do in a situation, you have guidance available to you including our Business Practices and Standards of Behaviour.

When you believe something isn't right, it probably isn't. Please speak up and share your genuine concerns, knowing that Whitbread wants to hear them.

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It is each and every team member's responsibility to follow these business practices and standards of behaviour so it is very important to understand what is expected of you.

If in doubt, talk to your line manager, or another person responsible for your area, or call the confidential Speaking Out helpline on 0808 801 0351.

If you are a line manager, it is your responsibility to make sure your team understands our business practices and standards of behaviour set out in this guidance and supporting policies and how to apply them in practice.

Speaking out

If someone is behaving in a way that's not in line with our business practices or standards of behaviour or in a way that's harmful to our team members, customers, or Whitbread's reputation, we'd like to know about it. Your concerns will be taken seriously and dealt with in a fair and balanced way.

Most of the time, the best way to deal with any issues or concerns is to talk to your line manager, or another person responsible for your area. Any genuine issues, or concerns raised in good faith, will be taken seriously and will always be investigated.

If you feel uncomfortable talking to your line manager or someone else at work, you can also call the independent and confidential helpline run by Hospitality Action which is open 24 hours a day, 365 days a year using the free phone number below. You don't have to leave your name, but you will be encouraged to do so if it will help to resolve the problem.

**Speaking Out Helpline:
0808 801 0351**

Lines are open 24 hours
a day, 365 days a year.

Our people

Equal opportunities
and diversity

Developing our
people

Respect in the
workplace

Human rights

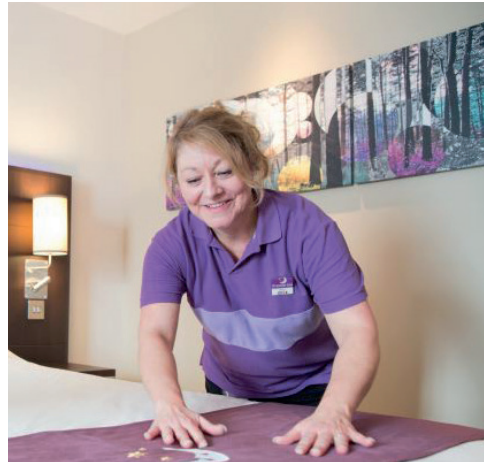
Staying safe
at work

Listening
to your views



Human rights

Our principle: Everyone deserves the right to live and work with dignity. We respect and protect human rights.



What do we mean?

We should ensure that we do not exploit anyone and that we uphold the rights of all those who work for or with us and the communities in which we operate.

There are basic standards of human rights that Whitbread will respect at all times. They relate to issues such as fair and proper pay, child labour, humane treatment and working conditions. Likewise, we do not tolerate forced, unethical employment practices, or human trafficking. We adhere to the principles of the Modern Slavery Act.

We expect our business partners to respect these standards too and these expectations are made clear to them at the start of any business relationship.

We encourage you to read Whitbread's Human Rights policy. If you see any abuses of the policy, then please report it to your line manager, or call the Speaking Out helpline straight away.

Q:

Lately my place of work has been very busy and it has been hard to find time to do routine cleaning. At this morning's meeting, our manager told everyone that if they don't complete their tasks before they clock out they will have to stay 'off the clock' to do so. Is it okay for our manager to ask this of us?

A:

No. This type of behaviour is not acceptable or endorsed by Whitbread.

Whitbread is committed to ensuring that all team members are paid for the hours they work. Any requests to work 'off the clock' must be reported to the senior line manager or another person that has overall responsibility for your area.

Equal opportunities and diversity

Our principle: Treat everyone fairly, with respect and integrity and without any discrimination, as we believe in equal opportunities for all.

What do we mean?

We aim to create and promote an environment that is inclusive of all people and their unique abilities, strengths and differences. We strongly believe that a diverse organisation encourages a full range of ideas and better decision making. We embrace diversity at Whitbread and we believe in equal opportunities for all. It is vital to our long term success.

We must all ensure that every team member, customer, supplier or anyone else we work with, is treated in a fair and unbiased way. This means that all decisions you make must be objective, free from any preconceived ideas you may have, and based solely upon business reasons.

We must all treat every team member, customer, supplier or anyone else we work with respect. Treat everyone in the way you'd like to be treated whilst respecting their individual needs and preferences.

Don't make any decisions, or treat anyone differently, because of their personal characteristics including:

- Their age, gender (including someone who identifies themselves as transgender), race, nationality, ethnicity, religion or belief;
- Their sexual orientation;
- Whether they have any form of physical or mental disability;
- Whether they are married or have entered into a civil partnership;
- If they are pregnant or on maternity/paternity leave;
- Or any other way that they are different from you.

Please make sure you have read Whitbread's Equal Opportunities policy. We expect that every team member is treated in a fair and unbiased way and this policy sets out our expectations for all team members. Failure to follow these policies may result in disciplinary action so it is very important you understand your responsibilities and what is expected of you.

We must all treat every team member, customer, supplier or anyone else we work with, with respect.

Q:

A member of my team has a long standing back problem. I've not asked them about this, but I think they must be struggling to carry out all of their duties. I think it would be a good idea to reduce their hours to support them. Is this ok?

A:

Although you are trying to do the right thing, you might not be. It is important to meet and discuss with that team member first to understand whether he or she is struggling and whether there is anything you or the company can do or whether adjustments can be made to support him or her at work. Simply reducing his or her hours would be discrimination.

If you are unsure about what to do, talk to your line manager, or another person responsible for your area, straight away.

Q:

I have been recruiting to fill a vacancy in my team and I have short-listed two candidates. One is an internal candidate who is pregnant and the other is someone external. Should I just hire the external candidate?

A:

You should base all of your recruitment decisions on ensuring you hire the right person to do the role, rather than their protected characteristics. If you make decisions based on a protected characteristic (i.e. refusing to promote someone because they are pregnant) this would be discrimination.

Effective recruitment is the process of having the right person, in the right job, at the right time.

If you are unsure about what to do, talk to your line manager, or another person responsible for your area, straight away.

Respect in the workplace

Our principle: We respect each other and are all responsible for creating a workplace free from any bullying or harassment.

What do we mean?

At Whitbread, we respect each other. All of us have important jobs to do and everyone should be free to perform their job well. We are all responsible for creating an environment of mutual respect.

Respecting your colleagues means you never:

- Use physical or verbal abuse or threats;
- Share offensive, derogatory or sexually explicit materials by any business communication tool including but not limited to email, text services or Whatsapp, on the internet or on social media. Make sure you read Whitbread's Social Media policy, as failure to follow it may result in disciplinary action so it is very important you understand what is expected of you;
- Make offensive or derogatory jokes or comments (explicit or by innuendo);
- Engage in sexual or physical harassment or bullying; or
- Use any unwelcome behaviour towards a team member or person doing business with Whitbread.

If you believe that you or your colleagues aren't being treated with respect, talk to your line manager or another person responsible for your area in the first instance. Whitbread's Grievance policy also sets out positive steps to take to resolve the situation. You can also call the Speaking Out helpline.



Q:

I feel like I am being harassed by another member of the team, but I don't want to rock the boat by telling my line manager. What should I do?

A:

You can raise genuine concerns without fear of reprisal or 'payback', even if it turns out that you are mistaken. Anything you share will be taken seriously and treated sensitively.

Our line managers are trained to deal with issues or concerns that affect their team. First of all, you should consider whether the issue is something you can raise in-formally with your line manager, or with another person responsible for your area.

If you feel uncomfortable doing that, you can also raise your concern by calling the Speaking Out helpline.

Q:

Besides bullying and harassment, what other behaviours are unacceptable?

A:

As you can appreciate, it is impossible to list every type of unacceptable behaviour. However, some examples would include:

- Rude or abusive behaviour, such as raising your voice or arguing aggressively with other team members, guests, customers or our suppliers.
- Behaviour likely to seriously damage the relationship between guests or customers and the company, and/or impact the company's reputation.
- Physical violence, assault or fighting at work.

Q:

One of the team members I work with posted an inappropriate joke in our work Whatsapp group. I find it offensive, but I don't know who I should speak to about my concern. What should I do?

A:

We each have an obligation to make Whitbread a great place to work for all team members and any offensive behaviour is not acceptable. You should speak to your line manager to discuss your concerns.

Staying safe at work

Our principle: We will operate a safe workplace for our teams and customers. We give our team members the training and information they need to keep themselves, their colleagues and our customers safe.



What do we mean?

We must keep everyone safe. We'll give you the safety training and information you need to keep you and your environment safe, but if you're not sure about anything, check with your line manager. As well as our policies and procedures, there are a number of important laws and regulations that affect how we work. If you need more information, ask your line manager or take a look at Whitbread's Health and Safety policy.

If you travel overseas for work, please ensure you read Whitbread's International Travel Security policy and if you have any concerns, please speak to your line manager in advance of your business trip.

An important part of keeping a safe working environment is working without the influence of alcohol, illegal drugs or other substances that might alter your judgement and abilities. If you're aware of any behaviour like this that might cause a safety or environmental hazard, then you must tell your line manager or call the Speaking Out helpline straight away.

Q:

I saw a member of the Kitchen Team using out of date food, but I didn't feel confident to challenge them or tell my line manager. What should I do?

A:

We hope that you feel comfortable talking about any worries or problems with your line manager or another responsible person at work. However, we realise that speaking out can be difficult.

Our Speaking Out helpline has been put in place so that we all know what to do if we witness something we believe is wrong, and so that you know you're safe and supported if you decide to speak out.

Q:

My line manager is asking me to travel overseas on business, and I'm worried about my safety whilst I'm there. What should I do?

A:

We take the safety and security of our team members very seriously. If you are concerned about your safety relating to your business travel you should refer to Whitbread's International Travel Security policy.

The policy will tell you more about how you can assess whether the country you intend to visit is regarded as safe and the precautions you should take.

For example, if the policy classifies a country as high risk, you would need to follow the instructions for signing up to the company's watch service that will monitor you whilst you're away.

You should also ensure that you have completed the International Travel Security training on Whitbread's Academy Online before you travel.

If you still don't feel comfortable travelling, speak to your line manager straight away.

Developing our people

Our principle: We are committed to helping team members achieve their best and strive to build winning teams.

What do we mean?

All of our decisions about recruitment, hiring, development and promotion should be made on ability, skills, experience, behaviour, performance and potential to do the job. By employing the best people and creating an environment in which they can flourish and develop, we will achieve our business goals including our strong desire to build winning teams.

Your line manager is always there to listen to any suggestions or issues you might have. They'll also hold regular development reviews to talk to you about how you're getting on and how we can help with your personal development.

Listening to your views

Our principle: It's important that our team members feel engaged with what they're doing and motivated to do a great job.

What do we mean?

We regularly ask for your opinions and feedback. We use what you tell us to create an action plan and make improvements across the company.



Our business

Compliance with laws

Marketing and advertising

Conflicts of interest

Open and fair competition

Bribery and corruption

Political activities

Gifts and hospitality

Fraud and theft

Inside information



Complying with laws

Our principle: We always act within the laws of the countries we work in.

What do we mean?

We make sure that our policies and procedures comply with the law of any country in which we work, and we expect you to comply with those policies and procedures and with the law at all times. We don't condone law breaking and we will help the authorities deal with any offenders.



Q:

I am a line manager and I have to carry out an annual check of the Right to Work documentation for my existing team members that don't have indefinite leave to remain in the UK. Is this really necessary?

A:

Yes, you must carry out, record and retain relevant paperwork for these checks - it's the law. If you don't then you could be held personally liable and could result in you or the company being prosecuted with significant fines and worse still, imprisonment for you.

Failure to do these things may result in disciplinary action being taken against you, which could result in your dismissal.

Open & fair competition

Our principle: We believe in open and fair competition and only seek competitive advantage through fair and lawful means.

What do we mean?

Competition law is designed to ensure that businesses are competing fairly and are protected from others acting unfairly.

It is unlawful for competing businesses to make arrangements amongst themselves that could undermine open and fair competition or disadvantage customers. For example:

- Setting prices at which competitors will each sell their products or services to customers;
- By agreeing not to compete for each other's customers or agreeing which business will trade in which particular territory; and
- Exchanging commercially sensitive information with competitors such as business plans, future pricing strategy, marketing plans, or supply chain costs.

Arrangements do not have to be in writing to break the law; they can be agreed in a meeting, at a corporate event or during a telephone call. All team members must take great care when dealing with our competitors, whether as part of your role or socially.

Non-compliance with competition law can have extremely serious consequences for our businesses, including significant financial penalties and legal claims from competitors and customers, as well as the resulting damage to our reputation. For any individuals who break the law, this may result in imprisonment and fines, and disqualification from managing a business.

Q: One of our competitors suggested we agree to set a minimum price for our hotel rooms for an event taking place in a town where we both have hotels.

Is that OK?

A: No. This sort of activity is anti-competitive. You should report the conversation to your line manager straight away. If you don't, you and Whitbread could end up facing fines or even criminal charges.

Q: A sales person who works for a competitor and I are friends. Occasionally we talk about our marketing plans.

Should I be concerned?

A: Yes. You are revealing confidential information that Whitbread has invested time and money to develop. You may be in breach of laws prohibiting anti-competitive behaviour.

If you have any concerns, please refer to Whitbread's Competition policy and if in doubt, please speak to your line manager or to the Whitbread legal team.

Marketing and advertising

Our principle: Our communications with our customers or potential customers must be honest, true and accurate. When we say something about our products or services we must be able to substantiate it.

What do we mean?

It's against the law to mislead customers with our sales or marketing material. Any statement that sells or markets our products and services must be honest, true and accurate and we must be able to substantiate it. Claims we make for our products and services must comply with applicable advertising and marketing laws and regulations.

If you require any further information on compliance with advertising or marketing laws and regulations, please speak to your line manager or to the Whitbread legal team.



Conflicts of interest

Our principle: We should avoid or manage situations where our personal interests could conflict with the interests of Whitbread.

What do we mean?

We want all of our business decisions to be made fairly and objectively. You should always act in Whitbread's interests, rather than your own, when you're making business decisions.

Conflicts between your interests and Whitbread's can hurt our business and reputation even when you don't intend to do anything wrong. Ask yourself how your actions and relationships might appear to others.

You need to tell your line manager if you think you might have a conflict of interest.

Conflicts of interest could include:

- Activity outside work that might affect your work at Whitbread;
- Use of Whitbread's suppliers or contractors for personal use;
- Any financial interests you have in other companies Whitbread deals with; or
- A situation where you're dealing with someone as part of your work who is also a close friend or a member of your family.

If any of these situations arise, then tell your line manager straight away. Someone else should be given the responsibility for dealing with the matter and making any decision.

Q: My sister is looking for a job and I have a vacancy in my team. She is trained to do this type of work.

Is it okay if I hire her?

A: Whitbread does not wish to place any team members in a difficult situation at work, through any potential conflict of interest that may occur. In this example, your relationship could be seen by others to impact on performance, judgement or decision making.

You should avoid entering into any situation where your personal interests may conflict with those of Whitbread, such as employing a relative to work in your team.

In this situation, someone with overall responsibility for your area should deal with this matter on your behalf.

Q: My partner runs a small printing company, and I'm sure they could make our leaflets for a lot less than the current supplier.

Can I give them the contract?

A: No. Imagine how it would look if people realised you had given the contract to your partner. If your partner plans to bid for Whitbread work, you must declare your relationship to your line manager straight away. Someone with overall responsibility for this procurement area should be given the responsibility of dealing with this matter and making any decision.

Political activities

Our principle: We do not participate in any political activities but we do respect the right to hold different political views.

What do we mean?

We don't engage in any political activity as a company. This means we don't sponsor any political parties and we don't make any donations to political parties. But we do respect everyone's right to hold different political views. Everyone at Whitbread has the right to hold whatever political views they want provided they do not express views in the workplace which are in breach of our principles, Whitbread's Equal Opportunities policy or are otherwise contrary to the law.

It is not appropriate to use any of the company's funds for political activities. Never offer our facilities to political organisations free of charge, or at a discounted rate.

Q: *I am keen on participating in local politics. Is this OK?*

A: *Yes, you're allowed to participate in the political process as long as it's voluntary, in your own personal time and it does not create a conflict of interest with your role at work.*

Gifts and hospitality

Our principle: We must ensure gifts and hospitality are reasonable and don't improperly influence our judgement or decision making. If we're unsure about accepting any gift or hospitality, we say no.

What do we mean?

We all deal with customers, suppliers or other parties we do business with regularly. This means that sometimes you might be offered a gift, hospitality or other benefit that could place you or Whitbread in an awkward position, that is, in a position where what you are being offered might be seen as intended to persuade you to do something you shouldn't. This might be awarding a contract or doing something for the person who makes the offer which you wouldn't otherwise do.

Hospitality includes invitations to social functions, sporting events, meals and entertainment. Any gifts or hospitality should always be customary and reasonable in terms of value, frequency or timing, and must be recorded on the gifts and hospitality log sheet (an example of which is contained in Whitbread's Gifts and Hospitality policy). Information on limits and guidance is also contained in Whitbread's Gifts and Hospitality policy.

Before you offer or accept a gift or hospitality, ask yourself the following questions:

- Is the purpose of the offer or the timing of it, to persuade me to favour the person making the offer?
- Could it be against the law?
- Does this offer look odd or out of place under the circumstances?
- Does the offer seem high in value?
- Has this person tried to give me more than one gift recently?
- Would the company or I be embarrassed if the offer became public?

If the answer to any of the above is “Yes”, then please don’t make or accept the offer. Also, if you’re not sure whether it’s OK to accept a gift, then talk about it with your line manager. If you are in any doubt at all, it’s best to say no.

Many people working directly with customers or guests are offered tips for their services. Receiving tips from customers for doing your job well is fine, but please don’t ask for tips. Tips must be completely voluntary.

You can find more information in Whitbread’s Gift and Hospitality policy.

Q: We have a supplier who has invited several team members to dinners and events. There doesn’t seem to be any hidden motives or expectations behind it, other than to build a good working relationship. What should I do?

A: We don’t want to offend but we don’t want to give anyone the wrong impression either. Appearances count as do scale and frequency of accepting gifts or hospitality, even if you’re sure there’s no hidden motive.

Before you accept any gift or hospitality, please check Whitbread’s Gifts & Hospitality policy. If in doubt, politely decline.

Also remember to get approval in advance from your line manager and make sure you complete your gifts and hospitality log.

Q: May I accept a business lunch or dinner from a supplier?

A: In most circumstances, modest and infrequent business meals may be accepted. Whenever a supplier pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised. If the meal is offered during a tender process, you must politely decline.

Bribery and corruption

Our principle: We must never give or accept a bribe or participate in dishonest practices. It can seriously damage our reputation. It is better to miss out on a business opportunity than compromise our integrity and high standards.

What do we mean?

Whitbread is strongly opposed to all forms of bribery.

A bribe involves the promise of money, a gift or a favour to influence someone's behaviour so they don't perform their role properly. Never give or accept a bribe. Please also make sure that third parties working on our behalf understand that we do not approve of giving or accepting bribes.

Payments or gifts made to public officials to speed up or facilitate actions that officials are duty bound to perform are not permitted. Even if such payments are for small amounts, such payments are illegal in most countries and the company makes no distinction between such payments and bribes.

Likewise, we must not get involved in any dishonest practices including activities such as fraud, deception or collusion.

Any allegation of bribery or dishonest practice can have extremely serious consequences for Whitbread and its businesses as well as serious damage to our reputation.

For any individuals who are involved in any form of bribery or corrupt practice, this may result in imprisonment and fines, and disqualification from managing a business.

It is better to miss out on a business opportunity than compromise our integrity and high standards.

Q: A guest is offering me a tip for my services. Is that OK?

A: Yes. However, it's not OK to accept cash or cash equivalent (e.g. vouchers) from someone who then might expect you to favour them or their company.

Q: I'm being asked for a payment from a public official in order to speed up matters. What should I do?

A: This is illegal and you should refuse. Please also raise it with your line manager straight away and if you have any doubts or concerns about their response, please contact the Speaking Out helpline.

Fraud and theft

Our principle: We look after Whitbread's property as if it were our own, and work together to safeguard it to prevent fraud or theft.

What do we mean?

We all work hard to make Whitbread successful, so it is important that we work together to safeguard the company's property and assets and prevent fraud or theft.

Whitbread has comprehensive policies and procedures in place to protect its finances and takes any breaches of those procedures very seriously. This extends beyond taking money from the till, to claiming expenses, the payment of bonuses and the use or giving of vouchers.

Fraud or theft could either be committed by people within Whitbread or by external organisations or individuals. In all cases it impacts Whitbread's performance and counteracts the hard work and commitment of everyone else. Whitbread will refer all matters of suspected fraud to the police.

If you believe that fraud or theft is taking place, it is important that you talk to your line manager or call the Speaking Out helpline straight away.



Tax evasion

Our principle: Whitbread is firmly committed to meeting all of its statutory tax obligations, wherever in the world they might arise. Equally, Whitbread and its employees should not facilitate others to evade tax.

What do we mean?

Tax evasion is a crime and Whitbread can be criminally liable for acts committed by an employee, agent or consultant which facilitate others to evade tax. Common risks include requests for payment in cash or redirected payments. If tax evasion takes place, a business could face an unlimited fine as well as criminal convictions.

If you have any concerns that any team member, supplier or other person connected with Whitbread may have entered into any transaction to evade tax or to assist any other person to evade tax, please speak to your line manager immediately and if in doubt, please contact the Whitbread Group Tax team.

Q: I work in finance and have been asked by a supplier to pay a bank account in the British Virgin Islands. Payments normally go to a UK bank account.

What should I do?

A: If a supplier has asked you to do something unusual, this may require further investigation as it may involve tax evasion.

Please speak to your line manager straight away and if in doubt, please contact the Whitbread group tax team.



Inside information

Our principle: Information about the company which may affect Whitbread's share price if it became public knowledge must not be used for buying or selling Whitbread shares for your own or anyone else's benefit.

What do we mean?

Whitbread is a company listed on the London Stock Exchange. There are rules and regulations that apply to listed companies preventing individuals buying or selling Whitbread shares on the basis of inside information.

Anyone working for or with Whitbread may become aware of inside information about Whitbread or its businesses. Inside information may include:

- Financial information;
- Development of new products or services;
- A proposed business opportunity like buying or selling a business or entering or ending a joint venture;

- Government or regulatory body investigation into the company;
- Changes in senior personnel.

It makes no difference whether you deal in the shares yourself or someone else does it for you, whether it's for your own or anyone else's benefit. This applies even after you've stopped working for Whitbread.

It is a criminal offence to buy or sell Whitbread shares on the basis of inside information.

Q: It is not public knowledge yet, but I know from my work that our profits could be higher than expected so now would be a good time to buy Whitbread shares.

Can I buy Whitbread shares? If I can't, can I tell my family and friends?

A: Absolutely not. It's called insider dealing and it is a very serious criminal offence.

If in doubt speak to a member of the Whitbread company secretariat team.

Our company property, records and information

Complete and accurate
accounting records



Data protection
and privacy



Protecting company
property



Confidential
information



Protecting company property

Our principle: We should look after company property as if it were our own; we should use it carefully and protect it from any misuse.

What do we mean?

We all use company property in order to carry out our jobs. This includes buildings, vehicles, equipment supplies, computers, networks, e-mail and voicemail systems. Likewise, as part of our jobs we will create or develop things like brands, trade marks, designs, ideas, software, inventions as well as being privy to corporate opportunities, trade secrets and business information, all of

which is company property too. This principle extends to third parties we may work with.

Please look after all company property as if it were your own. We understand that from time to time our employees may use company equipment to access the internet for personal reasons but we should always protect it from misuse.



Complete and accurate accounting records

Our principle: We should ensure all financial and other reports and records are honest and accurate.

What do we mean?

Honest and accurate records help our shareholders see how their investments are being looked after. They're also a legal requirement.

Creditors, government officials, partners and people from across Whitbread all need to access books, records and statements about our financial performance. These must

give fair and accurate information and be protected from unauthorised viewing, damage and loss. It's important that you keep all documents safely and for the right length of time.

All people who work regularly with our reports and records need to follow our guidelines and procedures. If you are unsure of anything, always check with your line manager.

It's important that you keep all documents safely and for the right length of time.



Confidential information

Our principle: We should keep all non-public information safe and make sure it never gets into the wrong hands.

What do we mean?

Please be aware of where you are when you are discussing or working on company matters.

Whitbread's business information is one of our most valuable possessions and we expect all team members to keep this information confidential and safe, only share it internally on a "need to know" basis and only disclose it to a third party on a confidential basis and with legal or company permission to do so.

Confidential information may include:

- Financial information, business plans, business strategies, business practices and relationships, processes, systems or methods of operation;
- Specifications, pricing policies, marketing plans, costs or promotional activities;

- Inventions, innovations, know how or trade secrets;
- Information relating to customers, suppliers and partners.

If you're unsure whether company or business information is confidential, speak to your line manager before telling anyone else. Also let your line manager know if any such information has been shared or used without permission. If in doubt, you should speak to a member of the Whitbread legal team before any such information is shared or disclosed.

We have designated people who are solely responsible for talking to the media. This is to make sure that no confidential data or business information can accidentally be made public. So, please don't talk to the media, even if they approach you.



- I am able to get an early start on my day by returning calls while on the train to work.

Is this a problem?



- You must be very careful not to discuss company or business information in public places where other people may overhear you. Likewise, please be careful with what you discuss when speaking with friends or on email.

If it is necessary to conduct a telephone call in a public place, be mindful of your surroundings and inform the person you are speaking to of your whereabouts to manage their expectations.

Data protection and privacy

Our principle: We must respect everyone's privacy and ensure that we collect, use, store and dispose of all personal data in compliance with all applicable data protection laws.

What do we mean?

Data protection and privacy laws regulate how we collect, use and manage personal data (such as names, addresses, dates of birth, national insurance numbers, passport numbers and other data which can identify an individual). This data may relate to our employees, guests or customers, suppliers and partners.

We must comply with data protection laws whilst also complying with our own standards and policies on personal data.

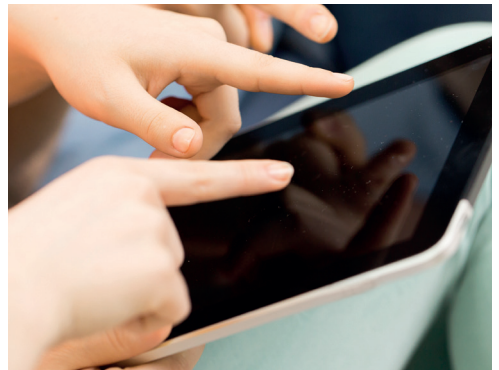
We only collect personal data in accordance with data protection laws. We must protect personal data and keep it secure at all times and in addition, we must take particular care when dealing with sensitive personal data (such as sickness records and health questionnaires).

Please make sure all personal data is managed or handled in accordance with the permissions given by the individual to whom the data relates.

We should anonymise data where and when necessary. This means removing names, contact details or any other information that could identify an individual. You should also protect personal data by using privacy enhancing techniques such as encryption where this is possible. Please refer to Whitbread's Information Security policies on the various security techniques that can be used.

If you're unsure whether data should be disclosed, speak to your line manager straight away. Likewise, you must inform your line manager if any personal data has been accessed, shared used or deleted without permission. Line managers must report any data breach to the Whitbread privacy office.

Please refer to Whitbread's Information Security policies and Group Data Protection policy and guidance documents as these will give you more information on who to contact and what to do when handling personal data, or in the event of a breach.



Q: I have lost my laptop. What should I do?

A: You may have stored employee or customer details (such as guest contact details) or other data incident email address, personal information on your laptop. This is personal data and it is important that it does not fall into the wrong hands so please ensure that you inform your line manager and in any event, you must report your lost laptop to Whitbread's Information Security team straight away.

Q: I want to email all guests to tell them about parking at one of our Whitbread sites. Is this OK?

A: Given guest email addresses are personal data, you must use the blind copy function (BCC) when sending group emails so that the guest receiving the email cannot see email addresses of the other guests on your group email. If you're unsure on how to use the blind copying function when sending group emails, please contact Whitbread's Information Security help-desk.

Q: I want to send a list of customer names and addresses by email. Is this OK?

A: Customer names and addresses are personal data and we must ensure these are kept secure at all times. Before sending the list via email or other means, please ensure that the appropriate security measures are applied. Please see Whitbread's Information Security policies as well as the Group Data Protection policy guidance documents for further guidance. If you are unsure, please discuss with your line manager before you send the list.

Please make sure you read Whitbread's Information Security policies as well as our Group Data Protection policy guidance documents.

Our environment and communities

Force for
GOOD

Enabling people to live and work well



Opportunity

A team where everyone can reach their potential
- No barriers to entry
no limits to ambition



Community

Marking a meaningful contribution to the customers and communities we serve



Responsibility

Always operating in a way that respects people and planet

Whitbread has always been about people, and we always will be. So, it makes sense that our sustainability programme is all about people too. It's called Force for Good; it's about helping everyone – our customers, team members and those we work with – to live and work well.

We've focused on three areas to make this happen. First, we're going to be a place where everyone can reach their potential with no barriers to entry and no limits to growth. We're going to make a meaningful contribution to the customers and communities we serve. And we're going to treat our people and planet with respect. How we treat people and the impact we have on our communities and environment is just as important as the experiences we provide.

Force for Good will help us create an even better place to work. It will help us serve customers today, and tomorrow, better than before. It will help us build brands that our customers love and trust. And it will help us create a forward looking, sustainable and successful business.

Force for Good starts with people. It starts with you.

For more information, please speak to a member of Whitbread's Corporate Social Responsibility team.

Business Practices or Standards of Behaviour Decision-Making Framework



Frequently asked questions

Q How am I expected to use this guidance on business practices and standards of behaviour?

A It is each team member's responsibility to follow this guidance document which outlines our business practices and standards of behaviour and supporting policies so please ensure you read them carefully and understand them. If you have any questions or concerns, please speak to your line manager, or the person responsible for your area, straight away.

Failing to follow this guidance document or any supporting policies may result in disciplinary action being taken against you, so it is very important to understand what is expected of you.

Q Where are all the policies referred to in this guidance document?

A All supporting policies can be found at <http://intranet/?p=719>

If you cannot locate the policy you're looking for, please speak to your line manager who will guide you to where it is or provide you with a copy.

Q What's the Speaking Out Helpline?

A If you feel uncomfortable speaking to your line manager or someone else at work about any issue or concern, you can also call the Speaking Out helpline.

This is an independent and confidential helpline that you can call using the free phone number 0808 801 0351 for reporting issues, concerns or behaviour that you believe is not in line with our business practices or standards of behaviour.

Lines are open 24 hours a day, 365 days a year.

Q May I call the Speaking Out helpline anonymously and will I get into trouble if I do this?

A It is absolutely fine to call the helpline anonymously and there won't be consequences if you do. You don't have to leave your name but you will be encouraged to do so if it will help to resolve the issue or concern you may have.

If someone is behaving in a way that's not in line with our business practices or standards of behaviour, we'd like to know about it. We assure you that your concerns will be taken seriously and dealt with in a fair and balanced way.

Do you have an issue you would like to raise but you are not sure of the best route?

Use the below flowchart to help you.

If you are nervous about raising any of the below, please be assured that you as an employee will be treated fairly and we take all concerns and feedback very seriously.

Is your concern about our own employment or how you have been treated?

- Has a team member or manager treated you unfairly?
- Has someone not followed the correct process which has negatively impacted you?
 - Have you been discriminated against?
- Has there been an unfair change to your pay, shifts or hours?

If you answered yes to one of the above a resolution to your concerns should be looked into informally in the first instance. If your concerns have not been resolved through an informal process you should raise the details of your concerns to employeerelations@whitbread.com or call the ER Helpdesk on **01582 844 344**

If you are aware of another Team Member who has concerns similar to the above, we ask that you encourage them to follow this process.

Do you have a serious concern which has affected a number of different people?

- Has someone committed a criminal offence or failed to comply with the law relating to:
 - Human rights;
 - Open and fair competition;
 - Bribery and corruption;
 - Fraud or theft;
 - Tax evasion;
- Accurate accounting records;
 - Data protection
- Is someone's health and safety in danger?
- Is the company causing risk or actual damage to the environment?
- Is someone covering up any of the above?

If you answered yes to one of the above, you should call the Hospitality Action Speaking Out line on **0800 801 0351**

Please note that a report to Speaking Out can be raised anonymously but must include as much detail as possible or any relevant evidence.

Do you have feedback about the business?

- Do you have an idea to improve the companies' current structure, processes, systems or policies?
- Do you have a possible solution to a challenge the business faces?
- Do you have a question about a recent business decision or change?

Raise to your Employee Representative via email.

Your rep will take forward popular topics for discussion at the Employee Forum.





