



FOUR SEASONS

FOUR SEASONS HUMAN RIGHTS POLICY

Updated 7 November 2023

INTRODUCTION

Four Seasons Hotels Limited and its affiliates (“**Four Seasons**” or the “**Company**”) is committed to respecting human rights in all markets in which we operate. It is our policy to comply with all applicable laws of the countries and jurisdictions in which we operate. Through our Environmental, Social and Governance (ESG) program, [Four Seasons for Good](#), we are committed to implementing best practices to embed respect for human rights throughout our business operations and our supply chain.

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*, *The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (The Code)*, and the *Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD)*. Four Seasons *Human Rights Policy* reflects our Company’s commitment to conduct our business in a manner consistent with the above principles and to respect human rights within our business operations and supply chain. Where applicable human rights laws exceed the requirements of the above principles, Four Seasons will abide by the requirements of all applicable human rights laws in the jurisdictions where these apply.

Our commitment to respecting human rights applies globally to all aspects of Four Seasons business operations. We expect all Colleagues,¹ Suppliers and their employees, contractors, sub-contractors, and business partners to abide by the principles outlined in this Policy and our [Supplier Code of Conduct](#). This Policy does not substitute or supplant the individual obligation of all suppliers, employees, contractors, sub-contractors and business partners to comply with their own obligations as may arise under all applicable laws.

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 principles and applicable laws. Our *Code of Business Conduct and Ethics* establishes clear ethical standards for how we do business. Colleagues are expected to complete annual training on our Code.

¹ Four Seasons employs individuals in our Company’s offices and at the hotels and residences we manage (“Corporate Colleagues”). The hotels and residences managed by Four Seasons also employ individuals (“Field Colleagues”). Field Colleagues are not employees of Four Seasons. For the purposes of this Policy, Corporate Colleagues and Field Colleagues are collectively referred to as “Colleagues.”

Responsible sourcing

Four Seasons is committed to responsible sourcing practices. Our [Supplier Code of Conduct](#) sets out principles and expectations as to how Suppliers 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 our [Human Rights Policy](#) and our [Environmental Policy](#), and the commitments set out in them.

Forced labour

Four Seasons is committed to ensuring that forced labour in all its forms, as defined by the 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 workers 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 is committed to ensuring 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 made available to Colleagues to assist in identifying and reporting suspected instances of human trafficking.

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 Colleagues, residents and guests.

The rights of children

Four Seasons is committed to ensuring that exploitation of children in any form does not take place in our business operations. The Company is a signatory of [The Code by End Child Prostitution and Trafficking \(ECPAT\)](#) and is committed to complying with all applicable 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.

Prevention of sexual exploitation

Four Seasons will comply with and supports all applicable laws and measures to prevent and punish the crime of sexual exploitation against children and adults.

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

Freedom of association and collective bargaining

Four Seasons respects Colleagues' rights to freedom of association and collective bargaining, if they so chose, subject to and in accordance with all applicable 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, Colleagues, and business partners. Our Company is committed to complying with all applicable occupational health and safety laws and does not tolerate retaliation and other disrespectful or inappropriate behaviour in the workplace, violent conduct, threats of violence, workplace harassment, workplace sexual harassment, and any other legally prohibited form of harassment among or towards our Colleagues, residents and guests.

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 race, ancestry, place of origin, ethnic origin, colour, disability, religion, sex, sexual orientation, gender identity, gender expression, age, and any other additional prohibited grounds of discrimination as defined by all applicable 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 Colleagues.

We are committed to non-discrimination and fairness in all of our labour practices and through all aspects of the employment relationship. Our commitments are further described in our *Workplace Violence, Workplace Harassment and Discrimination Policy*.

Coercion

Four Seasons will 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.

Violence and harassment in the workplace

Four Seasons will not tolerate workplace violence or workplace harassment of any kind, as described in our *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 Colleagues, residents and guests.

Community and the environment

Four Seasons strives to ensure that our business operations do not adversely impact basic human needs such as access to food, water, sanitation, or the healthcare of local communities. Our [Environmental Policy](#) outlines our commitment to implementing best practices to embed sustainability throughout our business operations and our supply chain.

GOVERNANCE

Suspected breaches of our *Human Rights Policy* will be taken seriously by Four Seasons. We have established procedures that are described in our Code of Business Conduct and Ethics to facilitate the submission of concerns.

This *Policy* is a key component of Four Seasons commitment to achieving the objectives of our ESG program. The ESG Committee of Four Seasons Board of Directors advises and guides Four Seasons 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.

Our *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 ESG Committee of the Board of Directors of Four Seasons approved this Human Rights Policy on 7 November 2023.