

# HUMAN TRAFFICKING & ABUSIVE ACTS PREVENTION POLICY



## 1. SCOPE

This policy applies to Northland Properties Corporation Hotel's ("NPC") corporate offices and owned, leased and managed hotels. NPC expects its suppliers and business partners to comply with all laws and regulations and is committed to working with and encouraging its owners, partners, and others in its value chain to uphold these principles in their own operations and business relationships.

NPC strictly prohibits the use of modern slavery, human trafficking, and any abusive acts in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that none of these acts take place anywhere within our organization or in any of our supply chains.

## 2. COMMITMENT

Human rights are the basic rights and freedoms inherent to all human beings. NPC is committed to complying with the U.S. federal law and state laws, Canadian federal law and provincial laws, and United Kingdom federal laws in which we operate. We shall be a company that expects everyone working with us or on our behalf to support and uphold these standards. Prohibited conduct under this policy includes, but is not limited to, the following:

- Using forced or slave labor, including prison, bonded, or debt labor. This prohibition includes transporting, receiving, trafficking, harboring, recruiting or transferring, of persons by means of threat, force, coercion, abduction, or fraud.
- Employing individuals who are under 14 years of age or the lawful age of employment (whichever is higher).
- Failing to comply with applicable laws and regulations regarding compensation, hours of work, overtime and benefits.
- Failure to respect the right of freedom of opinion and expression, including the freedom to hold opinions without interference provided,



however, that the exercise of such rights does not interfere with the safe and efficient performance of work by persons on working time.

- Failure to respect employees' and guests' privacy rights. NPC is committed to safeguarding information gathered for legitimate business purposes in a reasonable manner and in accordance with laws.

### 3. INDICATORS

Human Trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Abusive Acts are inclusive of human trafficking, but also related to forced and compulsory labour, child labour, and inappropriate childcare (babysitting, day care, day camp). These are crimes and violations of fundamental human rights.

Human Trafficking is inclusive of sex trafficking, labor trafficking, and drug trafficking. All departments (front desk – guest services, food and beverage, housekeeping, security / engineering, and amenity attendants) within our company must be aware of these indicators:

- Individuals showing signs of fear, anxiety, tension, submission, and/or nervousness.
- Individuals have few or no personal items – such as no luggage or other bags.
- Individuals avoid eye contact and interaction with others. Appear to lack freedom of movement or are constantly monitored.
- “Do Not Disturb” sign used constantly.
- The same person reserving multiple rooms or excessive number of people staying in the room.
- Room paid for with cash or pre-loaded credit card.
- Individuals leaving room infrequently, not at all, or at odd hours.

*Each indicator alone may not necessarily mean a person is being trafficked.*

### 4. PREVENTION METHODS & GOALS

NPC addresses these human rights impacts in the following ways:

- NPC requires all employees to take training on detection, reporting, and



documentation of Human Trafficking & Abusive Acts Prevention.

- NPC strives to conduct human rights due diligence to determine actual and potential human rights impacts in our value chain and seeks to mitigate these impacts through reasonable measures.
- NPC seeks to continually strengthen its due diligence processes by tracking and integrating findings back into its policies and procedures.
- NPC seeks to establish and strengthen mechanisms to report and investigate known or suspected human rights violations.

## 5. REPORTING REQUIREMENTS

Employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately in accordance with the internal procedure. Timeliness of reporting any suspected violation is critical due to the nature of the acts. Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment.

In order to report any information or violations, please contact management directly at the hotel.

Additional resources for reporting human trafficking crimes are listed below:

**Canada:** The Canadian Human Trafficking Hotline may be contacted to make a confidential, anonymous report by dialing 1-833-900-1010. Local law enforcement may be contacted to make a confidential report by dialing 911 or calling the local non-emergency number.

**USA:** The National hotline (toll-free 1-888-373-7888) and text line (233733) to report human trafficking. Local law enforcement may be contacted to make a confidential report by dialing 911 or calling the local non-emergency number.

**UK:** To report any suspected violations in the UK, call 999, 101 or the Modern Slavery helpline at 0800 012 1700. In addition, be sure to complete the internal Human Rights Incident Report Form.