Human Rights Due Diligence Framework

1. Objective

Minor recognizes that our operations have the potential to negatively impact human rights of our stakeholders. Guided by Minor's Human Rights Policy, we aim to ensure full respect for human rights in all aspects of our business and uphold our commitment to human rights. The objective of the Human Rights Due Diligence Framework is to establish a systematic and comprehensive approach to identify, prevent, mitigate, and account for potential adverse human rights impacts arising from our activities, operations, and supply chains.

This framework is aligned with internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights (UNGP), as well as other relevant international human rights conventions and guidelines.

2. Scope

This framework applies to Minor Group operations and business relationships including supplier, contractors, as well as local communities where we operate.

3. Framework

Key components:

1. Risks Identification

Human rights risks are identified based on context assessment, taken into account the geographic locations and nature of business as different countries and sectors may present unique human rights challenges. The framework takes these variations into account, ensuring that sector-specific risks and risks linked to particular national or regional contexts are adequately addressed. This involves understanding the social, political, economic, and cultural contexts of the areas where Minor has activities, projects, or supply chains are located.

In addition, human rights should be mapped for the entire supply chain to identify risks associated with suppliers operations, sourcing, and labor practices.
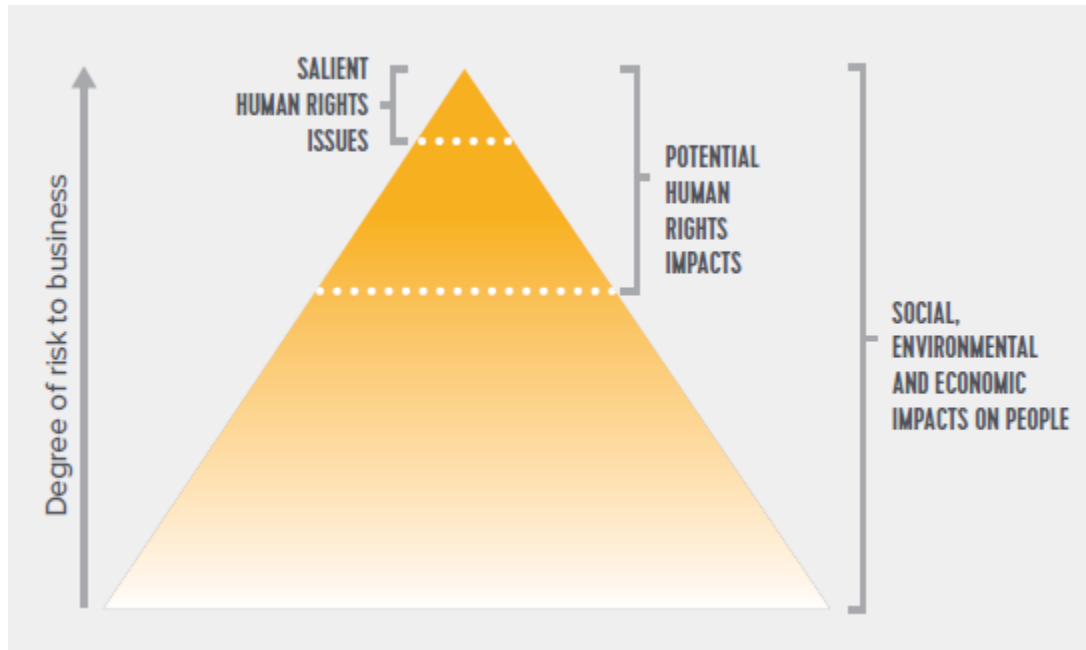
- Data and information collection:
    - Conduct desktop research using qualitative risk data including industry risk landscape, country risk indices, media and civil society reports.
    - Engage internal and external stakeholders to identify potential human rights issues as part of stakeholder engagement in accordance with Minor International Stakeholder Engagement Guideline.
- Where necessary, engage human rights experts to provide perspectives and insights into identifying potential risks.
- Identify long list of relevant human rights risks. Human rights risk topics and sub-topics are shown in Appendix 1.

2. Determination of Salient Risks

Within the Human Rights Due Diligence Framework, the identification of salient human rights risks is a critical step to prioritize and focus efforts on the most significant impacts. In line with UNGPs, salient human rights issues are those that pose the greatest risk to people's human rights through a company's activities or business relationships, based on:

- Severity – Scope, scale and irremediability
- Potential likelihood of risk
- Negative impact on human rights
- Focus on risks / impacts to people (rights holders)

Figure 1: Convergence between salient human rights issues and risk to business

Source: UN Guiding Principles Reporting Framework

Relevant human rights risk topics from a "long list" are evaluated based on severity (scale, scope and remediability) and likelihood in alignment with the UNGPs. Those that record the highest scores are identified as Minor International's salient risks. Criteria to prioritize salient risks are shown in Appendix 2.

3. Risk Mapping

Risk Mapping by geographies and sectors

- Group potential human rights risks into risk topic based on Appendix 1.
- Identify geographic locations and sectors where these risks are prevalent.
- Map risk topics by geography and sectors to provide a visual and systematic representation of identified human rights risks.

Figure 2: Example of risks mapping by geography and sector

Risk rating			
Low	Medium	Large	Very large

Risk topic	Asia Pacific			Americas			EU		Middle East		Africa	
	Hospitality	Logistics	Retail	Manufacturing	Hospitality	Logistics	Hospitality	Logistics	Hospitality	Logistics	Hospitality	Logistics
Conditions of work												
Freedom of association and collective bargaining												
Health and safety												
Discrimination												
Forced labour												
Rights of protection for the child												
Product safety and stewardship												
Data privacy												
Land, natural resources and cultural rights												
Civil and political rights												

Risk Mapping by stakeholders

Map stakeholders impacted by Minor's operations and supply chain according to their risk exposure. While regions record different risk issues, the visual provides an overarching view of risk exposure based on current level of governance and mitigation measures that are in place for these stakeholders. Risk ratings are derived from a combination of potential risks faced by stakeholders in Minor's operating sectors, as well as information gather from stakeholders and human rights experts.

Figure 3: Example of risks mapping by stakeholders

Risk rating			
Low	Medium	Large	Very large

Business Unit	Ownership	Stakeholders					
		Direct Employees	Contract Workers	Indirect Employees	Direct Suppliers	Indirect Suppliers	Local Community
Minor Hotel	Properties wholly-owned by Minor						
	Properties under lease (including JV)						
	Properties under management-agreement contracts						
Minor Food	Wholly-owned by Minor Food						
	Franchisees						
Minor Lifestyle	Distribution centres and logistics						

4. Related Documents

[Human Rights Policy](#)

[Whistle-Blower Policy](#)

Human Rights Risks Map 2023

Human Rights Risk Assessment (internal document) Sustainable

Supplier Self-Assessment (internal document) Sustainable Supplier

Audit Scorecard (internal document)

Appendix 1: Human Rights risk topics

Human rights risk topic	Human rights	Sub-topic
Conditions of work	• Right to work • Right to enjoy just and favourable conditions of work • Right to social security, including social insurance • Right to an adequate standard of living	• Contracts • Working hours • Wages
Freedom of association and collective bargaining	• Right to freedom of association • Right to form and join trade unions and the right to strike • Right to freedom of assembly	• Worker Associations • Collective Bargaining • Strikes
Health and safety	• Right to a family life • Rights of protection of the family and the right to marry	• Physical and mental health • Ergonomics • Occupational accidents • Sickness cases • Absence days • Prevention • Trainings
Discrimination	• Right to enjoy just and favourable conditions of work • Right to equal pay for equal work • Elimination of discrimination in respect of employment and occupation.	• Gender • Race • Religion • National Origin • Age • Harassment

Forced labour	• Right not to be subjected to slavery, servitude or forced labour • Rights to liberty and security of the person • Right to freedom of movement	• Forced labour • Sexual exploitation
Child Labour	• Rights of protection for the child • Right to education	• Child labour • Sexual exploitation
Product safety and stewardship	• Right to health	• Product Safety • Consumer Health
Data privacy	• Right to privacy	• Data Protection • Data Security • Use of Customer Data
Land, natural resources and cultural rights	• Right of self-determination • Rights of minorities	• Local/Host Communities • Cultural Rights • Displacement • Water
Civil and political rights	• Rights to freedom of thought, conscience and religion • Rights to freedom of opinion and expression • Right to equality before the law, equal protection of the law, and rights of non-discrimination	• Freedom of thought • Freedom of expression

Appendix 2: Criteria to prioritize salient risks Severity

Scale: How serious is the impact as an infringement on people's human rights?	
1	**Low** severity of damage to people
2	**Moderate severity** of damage to people
3	**Significant severity** of damage to people
4	**High** severity of damage to people

Scope: How far-reaching are the impacts (relatively)?	
1	**Isolated**, very specific rightsholders are affected
2	**Limited**, moderate amount of affected rightsholders
3	**Substantial,** affects a significant amount of rightsholders
4	**Extensive,** affects almost all rightsholders

Remediability: How reversible are the impacts?	
1	There is little damage to people. There are equal short-term possibilities of compensation.
2	There is moderate damage to people. There are similar possibilities of compensation.
3	There is a high level of damage to people. There are no equivalent possibilities of compensation.
4	There is considerable, irreversible damage. There are no possibilities of compensation.

Likelihood

Likelihood: Does the operating context increase the likelihood of a negative human rights impact occurring?	
1	The impact of the issue is very unlikely to occur
2	The impact of the issue is unlikely to / may occur
3	The impact of the issue has a moderate probability of occurrence
4	The impact of the issue is likely to occur
5	The occurrence of effects of the issue is very likely / quite certain