
**AFFIDAVIT IN TERMS OF SECTION 55 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, 2000**


I, the undersigned,



do hereby make oath and say that –

1. I am a major female employed as the Regional Director of Human Resources for Africa and the Indian Ocean by Hilton International South Africa Pty Ltd, with registration number 1992/003630/07 (**Hilton**) situated at 138 Rivonia Road, Sandton, South Africa, 2196 in the province of Gauteng, the Republic of South Africa.
2. The facts contained in this affidavit fall within my personal knowledge and belief and, save where otherwise stated or where the contrary appears from the context, are true and correct.
3. On about 1 December 2022, Hilton received a communication from the Animal Law Reform South Africa (**ALRSA**). The communication contained a request for access to information in terms of the Promotion of Access to Information Act, 2000 (**PAIA**) (**First Request**). A copy of the First Request is attached hereto as Annexure A.
4. As part of the Request, ALRSA made a request for information about Hilton's egg supply chain. Hilton undertook a reasonable search in relation to the information requested in paragraph 6 of the First Request and was unable to

locate any records relating thereto.

5. In addition, on about 31 January 2023 Hilton received a further request from ALRSA in terms of which the ALRSA requested, *"...records relating to any and all assessments, audits, and inspections of suppliers of eggs, and products containing eggs or egg by-products, conducted during the period of 1 November 2018 to 30 November 2022 by Hilton or any third parties to give effect to the Responsible Sourcing Policy"*. A copy of this request is annexed hereto marked Annexure B (**Second Request**).
6. Hilton responded to ALRSA in a letter dated 10 February 2023, attached hereto as Annexure C, stating, *inter alia*, that it had undertaken a reasonable search to locate any records responsive to the requests in paragraph 6 of the Request and the requests in the Second Request and it did not have such records. Instead, ALRSA was invited to reach out to Hilton's suppliers directly for the information.
7. I set out below a summary of the steps taken by Hilton to locate the records requested in the Request and Second Request.
 - 7.1 Annual and Sustainability Reports produced during the period
 - (a) Hilton provided its most recent Environmental, Social and Governance Report in its February 10, 2023 correspondence to ALRSA. After a diligent search Hilton was not able to find any additional reports that exist. Hilton took the following steps to satisfy itself that such reports do not exist:
 - (b) Hilton's annual and sustainability reports are located on the company's global ESG website, esg.hilton.com, which was referenced in Hilton's February 10, 2023 correspondence:
Hilton remains committed to our published 2030 Travel With Purpose goals as well as our Animal Welfare statement which outlines our work towards the legal, ethical and humane treatment of animals across our value chain. This information was provided as part of our February 10, 2023 correspondence.
 - (c) The following people assisted in the attempts to locate the information:
 Hilton Supply Management's (**HSM**) Director of



This information was provided as part of our February 10, 2023 correspondence.

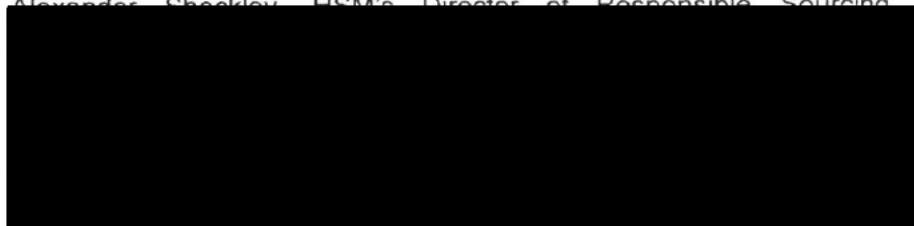
7.2 Legal Compliance: Any and all enforcement and compliance records issued during the period specifically in relation to compliance and/or non-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof)

- (a) After a diligent search, Hilton did not find records responsive to this request. Hilton took the following steps to satisfy itself that such reports do not exist:
- (b) HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that those files did not contain any responsive records.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined that those files did not contain any responsive records.

- (c) The following people assisted in the attempts to locate the information:

Alexander Checkley, HSM's Director of Responsible Sourcing

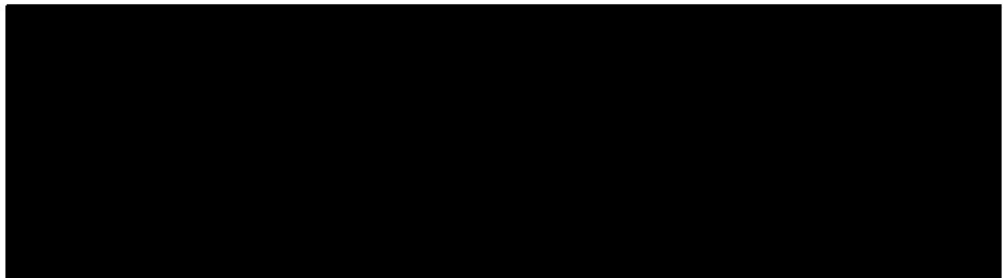


7.3 Any information recording or containing details of inspections by the South African Police Service ("SAPS"), National Council of Societies on the Prevention of Cruelty to Animals ("NSPCA") and any Societies for the Prevention of Cruelty to Animals ("SPCA"), and any other relevant authority of animal welfare.

- (a) After a diligent search, Hilton was able to determine that no such inspections were conducted. Hilton took the following steps to satisfy itself that such reports do not exist:
- (b) HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that those files did not contain any responsive records.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records or awareness of such inspections. HSM's Director of Procurement for Africa and the Indian Ocean reviewed the request and determined Hilton hotels had not been subject to these inspections.

- (c) The following people assisted in the attempts to locate the information:

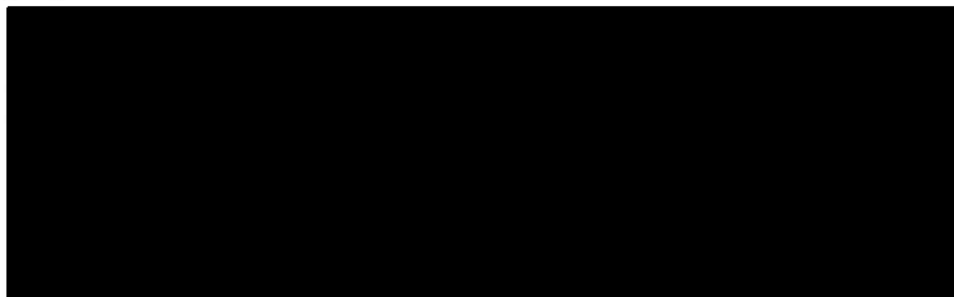


7.4 Charges laid, and judgments and orders handed down, including in any and all criminal and civil proceedings in which you were cited as a party relating to the aforementioned legislation

- (a) Hilton is not aware of any proceedings that it was a part of that related to these matters, After a diligent search Hilton satisfied itself that it did not have any records or details to provide regarding this request as no charges had been laid and no judgements and orders had been handed down. The steps that were taken to satisfy Hilton that there were no such charges, judgements and orders are as follows:
- (b) HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that those files did not contain any responsive records.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to confirm the findings of the Director of Responsible Sourcing were accurate. No charges, judgements or orders were identified.

- (c)

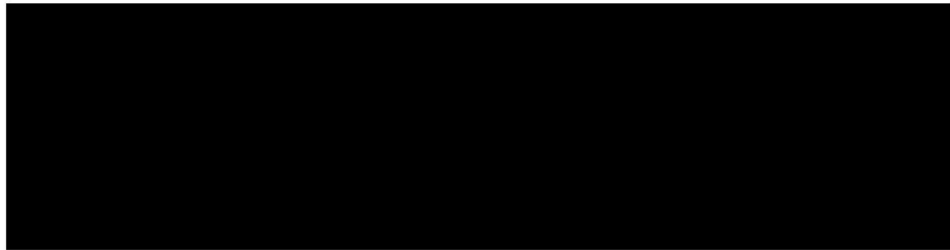


7.5 Internal Policies relating to Animal Welfare and Environmental matters applied or produced during the period.

- (a) Hilton provided its Animal Welfare Statement and Responsible Sourcing Policy in its February 10, 2023 letter to ALRSA. After a diligent search it was determined that there are no additional internal policies in place. The steps that were taken to satisfy Hilton that there are no such policies are as follows:
- (b) HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that there are no additional internal policies specific to animal welfare. Hilton's Animal Welfare Statement covers all matters related to the legal, ethical, humane treatment of animals across its value chain.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to confirm there are no additional policies in South Africa specific to this topic. No additional policies were identified.

- (c) The following people assisted in the attempts to locate the information;



7.6 Egg production and Supply Chain details such as records relating to the number of chickens housed/processed per annum of each of Hilton's suppliers; records relating to the number of eggs produced per annum of each of Hilton's suppliers; records relating to nutrition of chickens of each of Hilton's suppliers; records relating to the use of cages and type of cages used by each of Hilton's suppliers; records relating to the stocking density of each of Hilton's suppliers; and records relating to the number of chickens and chicks culled in the production process by each of Hilton's suppliers.

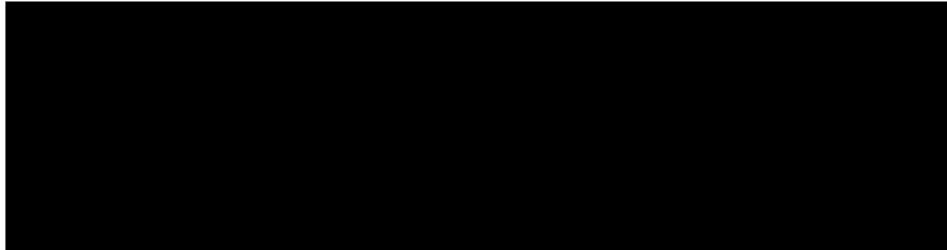
- (a) After a diligent search, Hilton did not find records responsive to this request. Hilton took the following steps to satisfy itself that such reports do not exist:

HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that those files did not contain any responsive records.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records or awareness from its suppliers containing this information. HSM's Director of Procurement for Africa and the Indian

Ocean reviewed the request and determined Hilton does not possess any information regarding this request.

- (b) The following people assisted in the attempts to locate the information:



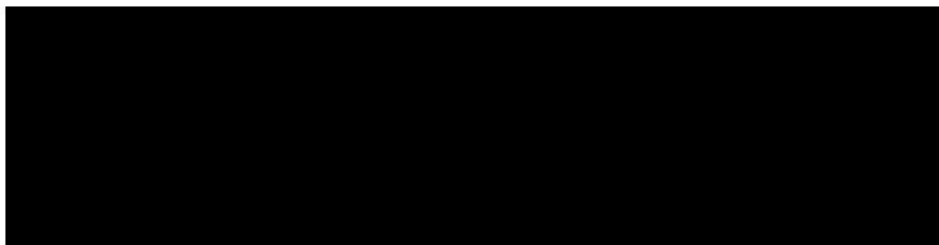
7.7 Asset Register and Stock: Any and all records relating to Hilton assets and stocks that may be relevant based on the aforementioned explanation of the Project.

- (a) After a diligent search, Hilton did not find records responsive to this request. Hilton took the following steps to satisfy itself that such reports do not exist:

HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that those files did not contain any responsive records relevant to this request.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined that those files did not contain any responsive records relevant to this request.

- (b) The following people assisted in the attempts to locate the information:



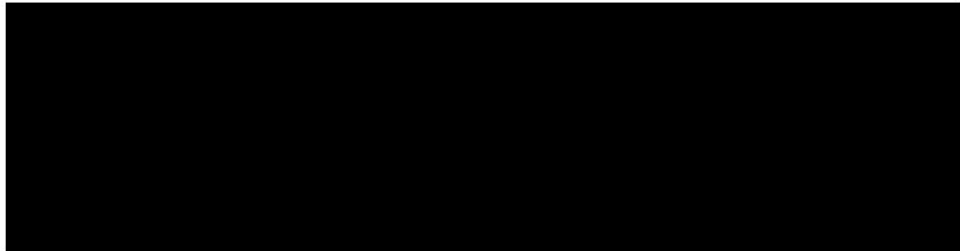
7.8 Membership records relating to any and all membership (present and past) relating to the egg, chicken and poultry industry.

- (a) Hilton is not a member of any of the listed organizations and therefore does not have records or details to provide regarding this request. Hilton took the following steps to satisfy itself that such reports do not exist:

HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and lists of membership, and determined that those files did not contain any responsive records relevant to this request.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records with information of memberships relating to the egg, chicken and poultry industry in South Africa. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined Hilton is not a member of any membership groups related to this topic.

- (b) The following people assisted in the attempts to locate the information:




7.9 Compliance with Association standards and requirements and Certification: Any and all records of compliance and/or non-compliance with third party standards and/or requirements, correspondence as applicable and certifications with/by the Associations and other third party standards and/or requirements that may be relevant based on the aforementioned explanation of the Project.

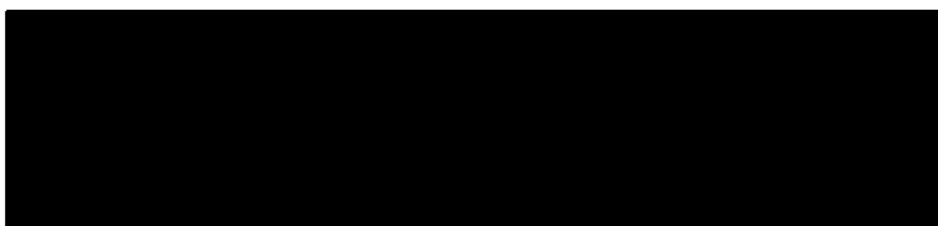
- (a) After a diligent search, Hilton did not find records responsive to this request. Hilton took the following steps to satisfy itself that such reports do not exist:

HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that those files did not contain any responsive records.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined that those files did not contain any responsive records.

- (b) The following people assisted in the attempts to locate the information:

 HSM's Director of Responsible Sourcing,



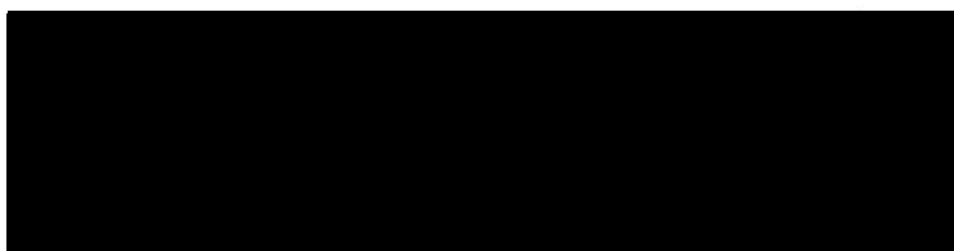
7.10 Third Party Certification: Certificates/notices, letters and correspondence illustrating any third-party certifications.

- (a) After a diligent search Hilton was not able to find such certificates, letters and correspondence as such documents do not exist. The steps that were taken to satisfy Hilton that such documents do not exist are as follows:

HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and lists of third-party certifications, and determined that those files did not contain any responsive records relevant to this request.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records with information of certifications relating to the egg, chicken and poultry industry in South Africa. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined Hilton does not have any additional certifications related to this topic.

- (b) The following people assisted in the attempts to locate the information:



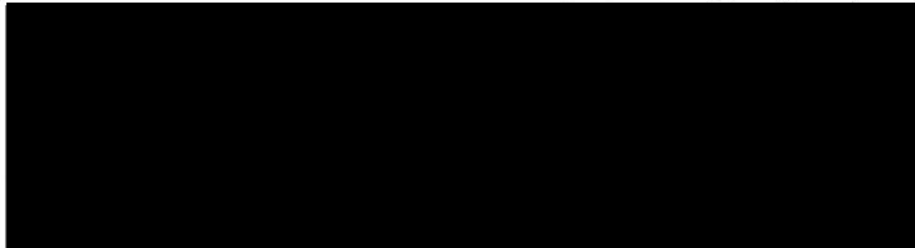
7.11 Records indicating any and all animal welfare-related commitments and progress towards these commitments This would include: Better Chicken Commitments ("BCC"); Cage-Free Commitments; and Other commitments that may be relevant based on the aforementioned explanation of the Project.

- (a) Hilton provided its Animal Welfare Statement in its February 10, 2023 letter to ALRSA, in addition to public disclosure of cage-free egg progress made available in its 2021 Sourcing Progress document. Hilton does not have additional records or details to provide regarding this request. The steps that were taken to satisfy Hilton that such commitments do not exist are as follows:

HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and existing public disclosures on animal welfare. Other than the two documents provided to ALRSA, no other relevant files were identified specific to this request.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records with additional information on this request. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined Hilton does not have any additional items specific to this request.

- (b) The following people assisted in the attempts to locate the information:



7.12 Public Statements: Any and all public statements relating to animal welfare regarding eggs, sourcing thereof or chickens under your control.

- (a) Hilton provided its Animal Welfare Statement in its February 10, 2023 letter to ALRSA, in addition to public disclosure of cage-free egg progress made available in its 2021 Sourcing Progress document. Hilton does not have additional records or details to provide regarding this request. The steps that were taken to satisfy Hilton that such public statements do not exist are as follows:

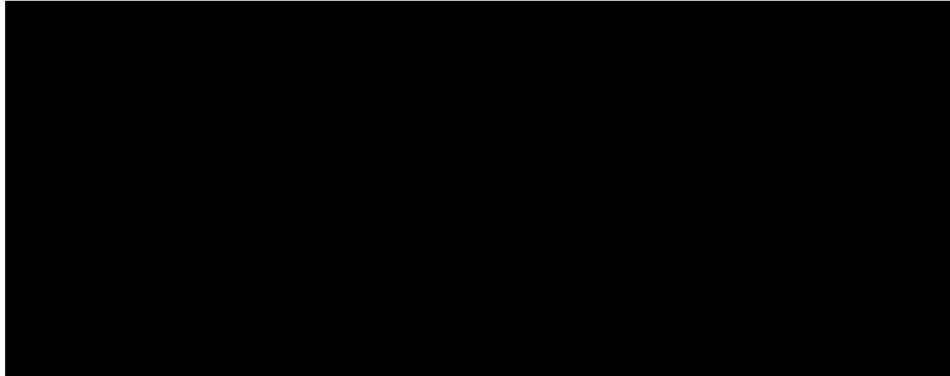
HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and existing public disclosures on animal welfare. Other than the two documents provided to ALRSA, no other relevant files were identified specific to this request.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records with additional information on this request. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined Hilton does not have any additional items specific to this request.

HSM's Director of Responsible Sourcing also contacted Hilton's Senior Manager of Corporate Communications to determine if she had any responsive records with additional information on this request. Hilton's

Senior Manager of Corporate Communications reviewed Hilton's communications files and determined Hilton does not have any additional items specific to this request.

- (b) The following people assisted in the attempts to locate the information:



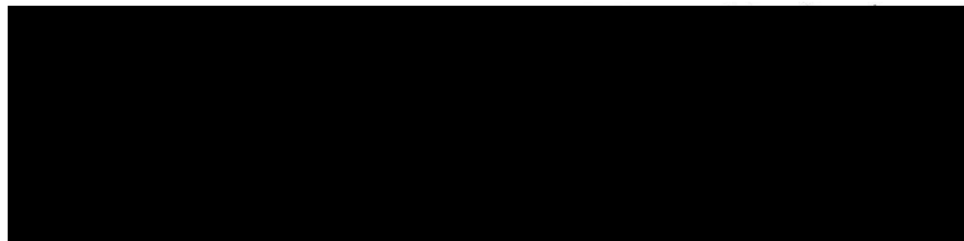
7.13 Records relating to any and all assessments, audits, and inspections of suppliers of eggs, and products containing eggs or egg by-products, conducted during the period of 1 November 2018 to 30 November 2022 by Hilton or any third parties to give effect to the Responsible Sourcing Policy.

- (a) After a diligent search, Hilton did not find records responsive to this request. Hilton took the following steps to satisfy itself that such reports do not exist:

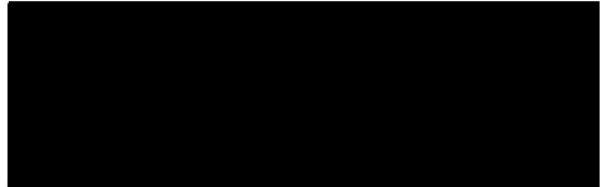
HSM's Director of Responsible Sourcing reviewed Hilton's corporate files and determined that those files did not contain any responsive records.

HSM's Director of Responsible Sourcing also contacted HSM's Director of Procurement for Africa and the Indian Ocean to determine if he had any responsive records. HSM's Director of Procurement for Africa and the Indian Ocean reviewed Hilton's files in the region and determined that those files did not contain any responsive records.

- (b) The following people assisted in the attempts to locate the information:



8. Accordingly, following all reasonable steps being taken to conduct a diligent search, Hilton hereby places on record that it is not possible to give ALRSA access to the aforementioned records as that information either cannot be found, alternatively the information does not exist.



I certify that this affidavit was signed and sworn to before me at Johannesburg on this the 28 day of March 2023, by the deponent after s/he declared that s/he knew and understood the contents of this declaration, that s/he had no objection to taking the prescribed oath and has taken the prescribed oath which s/he considered binding on his/her conscience, having complied with regulations contained in Government Notice R1258 of 21 July 1972, as amended.

