



Modern Slavery Act 2015: Slavery and Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes;

MALMAISON TRADING LIMITED
HOTEL DU VIN TRADING LIMITED
MALMAISON HOTEL DU VIN BRAND SERVICES LIMITED
NEW LIGHT HOTELS LIMITED
FRASERS HOSPITALITY (UK) LTD

modern slavery and human trafficking statement for the financial year ending 30 September 2021.

Introduction

As a group of leading hospitality companies, we are rightly held to high standards in all aspects of our business. We are committed to carrying on our business in an honest, ethical and responsible manner that upholds and respects the rights and dignity of individuals and the communities where we operate. We constantly evaluate our practices to ensure modern slavery is not taking place anywhere in our operations or in our supply chains.

Our organisation

We comprise of the UK division of a global hospitality company – Frasers Hospitality, the hospitality arm of Frasers Property Limited – with a diverse portfolio of hotel brands operating across Australia, Asia, Middle East, Africa and Europe, and with approximately two thousand nine hundred staff employed within the UK.

Our supply chain

As a hospitality company, our supply chains primarily cover and relate to procurement for everything required for running serviced apartments and hotels at each stage of their life-cycle. This procurement occurs both locally and centrally, and our suppliers vary between their size and expertise, many of whom are themselves reliant on their own supply chains across multiple jurisdictions.

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A Member of Frasers Property Group Registered in England and Wales No: 4119290



Our policies and procedures

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business and our policies and procedures set out how we as an organisation achieve this. These policies and procedures cover our global operations and supply chain and are audited and reviewed regularly.

In particular, our employees and suppliers are required to comply with our *Business Code of Conduct*. This policy reflects our commitment to acting ethically and with integrity in our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place within the business or within our supply chain.

Further, our *Whistleblowing Procedure* encourages our staff to report in good faith and confidence any suspected misconduct and illegal activity, including human rights violations such as modern slavery and human trafficking. In the event of any such reports we carry out a full investigation and ensure that appropriate safeguards are in place to protect the whistle-blower.

Our employees

When recruiting employees for our organisation directly, we ensure that all new hires must have:

1. The right to live and work in the UK;
2. Their own personal bank account into which their salary is paid; and
3. Valid employment or education references (if applicable).

When employing agency staff via a third party, we use only reputable employment agencies to source labour and verify the practices of any new agency before we accept workers from that agency. All agencies are selected after a tender process whereby each agency is required to provide evidence that they fulfil our standard operating policies and procedures, including providing evidence of each staff member's eligibility to work in the UK and suitable references.

Training and education

We understand that modern slavery is not a static issue and we are committed to continuing our collective efforts to raise awareness of the impact of slavery across our business and the wider hospitality industry.

As part of our induction process, we will include a discussion regarding the Modern Slavery Act 2015, educating new staff on modern slavery and human trafficking along with other human rights issues. Our employee handbook also contains detailed information regarding our *Business Code of Conduct* and our *Whistleblowing Procedure*. We will also commit to regular organisational-wide training sessions on these issues.

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Learning and improving

As a dynamic and global hospitality company, we need to be particularly aware of the emerging risks of modern slavery.

We intend to take the following further steps to combat modern slavery and human trafficking over the next financial year:

- Continuing to monitor the risk of modern slavery in our supply chain;
- Implementing specific training of all UK based employees to ensure a better understanding of the risks of modern slavery;
- Considering how best to map the supply chains of our UK and overseas businesses; and
- Focusing on the continued education of our suppliers and property owners.

We will continue to build upon our existing efforts to prevent human rights abuses and to combat modern slavery and human trafficking across our global operations, and to work with our industry to share best practices.

Approval

This statement was approved on 1st June 2020.

A handwritten signature in blue ink, consisting of several overlapping loops and lines, positioned above the name and title of the signatory.

Guus Bakker
Chief Executive Officer, EMEA
Fraser's Hospitality UK Ltd