

## **MILLENNIUM & COPTHORNE HOTELS LIMITED**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

#### **Introduction**

The UK Modern Slavery Act 2015 (the ‘Act’) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery and this statement sets out the steps we have taken during the financial year ending 2023 to prevent modern slavery and human trafficking in our own operations and supply chains.

#### **About Us**

Millennium & Copthorne Hotels Limited (“M&C” or the “Company”) is a global hospitality company employing 7,182 people across 26 countries.

The Company has its registered office in [London](#) and was listed on the [London Stock Exchange](#) until it was acquired by [City Developments Limited](#) (“CDL”), a Singapore-listed global real estate company, in 2019.

Although, the scope of the Act is limited to companies carrying on business in the UK with an annual turnover of £36m or more, as a global organisation, this statement covers all of M&C’s subsidiary companies (the “Group”, “we”, “us” or “our”); a full list of those subsidiary companies can be found in the Company’s latest Annual Report and Accounts at [Financial : Millennium Hotels and Resorts](#)

#### **Our Business**

We operate our hotels under different business models. In some cases, we own and operate the hotels within the Millennium Hotels and Resorts (“MHR”) family. In other cases, we or our joint venture partners manage hotels on behalf of third-party hotel owners. In several instances, we own hotels which are operated by third parties, while in other limited circumstances we franchise our brands for use by third party hotel owners who, in turn, operate their own hotels. With each business model, we are able to exercise varying degrees of control over operational policies and procedures and the review and selection of suppliers. Our business models did not change materially in 2023.

Owned and managed hotels: We are able to exercise the most control where we own and manage hotels, and to an extent, where we manage hotels on behalf of third party owners. In those cases, which account for the majority of MHR hotels, we rely on our Code of Ethics & Business Conduct, Group Human Rights Policy and Whistleblowing Policy (“Relevant Policies”) together with related training and procedures to help manage the risks of slavery and human trafficking. With regard to our other business models—such as franchising, management of hotels through joint ventures, and ownership of hotels which are managed by third-party operators—business partners make independent decisions regarding their hotel operations including procurement, employment and training practices and therefore we cannot fully dictate operational compliance with our Relevant Policies.

#### **Our Supply Chain**

Our supply chain is expansive and mostly consists of products and services needed to operate hotels and offices, such as staffing, operational supplies and equipment, furniture, fixtures, food, drinks, amenities, linen and cleaning supplies.



We expect our suppliers to effect business in full compliance of local law and best practice, fostering fair treatment of workers and ensuring safe and healthy work environments. We maintain zero tolerance for forced labour and human trafficking, severing ties with any non-compliant suppliers.

Due diligence and audits of our supply chain: We expect all of our suppliers, contractors and service providers to act ethically and with integrity and to have in place effective systems, safeguards and controls to ensure modern slavery is not taking place anywhere in their business or in their supply chains. To this end, we operate and maintain “preferred supplier” lists. Our approach is to develop long-term relationships with business partners and suppliers whose policies, values and cultures are aligned with our own.

Before any new supplier, contractor or service provider is approved, we carry out appropriate due diligence checks to assess the suitability of suppliers to provide goods and services in compliance with our policies and standards. This onboarding process requires the supplier to submit a ‘Supplier Set Up Form’ and captures confirmation that suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chain.

### **Our Employees**

In the UK and elsewhere, we operate a robust recruitment policy. We ensure that employment is chosen freely; freedom of association is respected; working conditions are safe and hygienic; child labour is not used; wages are not lower than minimum wage; working hours are not excessive; no discrimination is practised; regular employment is provided; and no harsh or inhumane treatment is allowed.

We carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, we ensure that all applicants are aware of what checks we will carry out and we only make job offers subject to satisfactory vetting procedures. All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. For people who are employed directly or on a fixed term basis, checks are also in place to ensure that payment of salary is direct to that person.

Where we use external agencies to provide staff, our recruitment procedure includes the requirement to use approved agencies. Our on-boarding procedure ensures that these agencies can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

In situations where we seek temporary labour, this is sourced via a managed service provider that, in the UK at least, is subject to their own obligations under the Act. Where M&C operates outside of the UK, we comply with local rules and regulations to ensure that our employees have the right to work in these countries.

### **Our Policies**

Our Relevant Policies, which includes our Code of Ethics & Business Conduct, Group Human Rights Policy and Whistleblowing Policy demonstrate that we are conducting business in an ethical and transparent manner. Moreover, we have a robust governance structure in place to oversee the implementation of and compliance with these policies across our business.



Our colleagues are encouraged to report non-compliance with these Relevant Policies, and we have formal procedures for raising concerns and, as appropriate, redress without fear of reprisal. The Group has elected to participate in CDL's group-wide whistleblowing programme. This allows employees to raise serious matters of concern—via email or a dedicated whistleblowing hotline—through an independent channel, being CDL's Internal Audit function. This programme is, in turn, overseen by the Audit & Risk Committee of CDL

Where our policies are not followed, we may take disciplinary action, up to and including termination of employment, depending on the nature of the infraction. Similarly, if a contractor or supplier fails to act consistently with our expectations or their contractual obligations, this failure may result in termination of their contract or the selection of an alternative provider.

### **Assessing and Managing Risks**

We have in place a risk management framework that helps the Group's Board of Directors and senior management team identify and assess risks, define our risk appetite, and develop and roll out standardised risk management processes, reporting requirements and other tools to manage risk within the organisation.

Following the delisting of the Company in 2019, the Company is a wholly-owned subsidiary of CDL. Whilst M&C's Board of Directors retains overall responsibility and accountability for the effectiveness of the risk management framework and internal control systems of the Group, with support of the management team, CDL's Board of Directors oversees the risk management framework and internal control systems of the wider CDL group, including the Company.

To ensure that all suppliers meet our internal policy requirements and to mitigate modern slavery risks that exist within our business and supply chain, our standard contractual terms and conditions require all suppliers, and each of their sub-contractors, to comply with the Act. We also seek to have standardised procurement processes designed to ensure we select and manage our suppliers appropriately. Our suppliers generally are segmented based on multiple factors including value, spend and risk exposures, and our supporting assessment processes provide a level of assurance and oversight over those suppliers and the services provided. Over the course of the next few years, we will continue to refresh the risk assessment of our supply chain, focusing on the key services and products as a starting point. We adopt a risk-based approach that takes into account many factors, including the geographical location from which services and products are provided, the number of links in the supply chain, whether our suppliers use of migrant or temporary labour and the nature of the goods or services being supplied. We will continue to use the results of this refreshed assessment to categorise key direct suppliers and identify potential areas of focus within our supplier base.

We view the steps being taken by the Company as an evolving process and will continue to monitor and review its risk profile to improve and strengthen its practices going forward.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and its supply chains, we continue to provide training for our employees in order that they can identify potential signs of modern slavery, human trafficking or child grooming and sexual exploitation and, if necessary, report them without fear of reprisal. Modern Slavery training is delivered through an online portal to ensure maximum access for all employees; with a quiz to test



understanding together with annual refresher training to ensure ongoing focus on this important topic. Completion is tracked both locally and centrally to ensure compliance.

### **Monitoring our Effectiveness**

We use the following measures, amongst others, to monitor and assess how effective we have been as a business in ensuring that modern slavery and human trafficking is not taking place within our business supply chains.

1. Any incidents or complaints of slavery and human trafficking reported under our Whistleblowing Policy or otherwise, are investigated promptly and any remedial actions recorded.
2. Raising awareness of the issue of modern slavery throughout our organisation by training and upskilling our employees with regular reviews to monitor the effectiveness of the compliance programme.
3. Due diligence checks on new suppliers and continuous monitoring of existing suppliers will help us to assess the risk of modern slavery and human trafficking in our supply chains.
4. In the UK, to implement a supplier code of conduct and obtain formal acknowledgement of our approach from suppliers which will ensure alignment with our principles and expectations. Thereafter, verifying suppliers' compliance with our supplier code of conduct on an annual basis.
5. Including contractual clauses that require new and existing suppliers to comply with applicable laws and our Group Human Rights Policy.

We acknowledge that we may need to review and improve our framework as the Modern Slavery Programme further matures.

### **Future Steps**

As we go forward into 2024, we will continue to develop our programme and ensure there are robust processes in place to maintain our high standards and to ensure human rights is respected across our business and supply chains.

Should you have any concerns or comments, please email us at [Supply.Chain@millenniumhotels.co.uk](mailto:Supply.Chain@millenniumhotels.co.uk)

We look forward to hearing any thoughts you may have and sharing our progress with you in the future.

This statement was approved on behalf of the Board of Directors of Millennium & Copthorne Hotels Limited on 24 June 2024.

**Kwek Eik Sheng**  
**Director**