

MILLENNIUM & COPTHORNE HOTELS LIMITED MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement is published in accordance with Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps we have taken during the financial year ending 2022 to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

About Us

Millennium & Copthorne Hotels Limited (“**M&C**” or the “**Company**”) is a global hospitality company employing 6,441 people across 27 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 Commitment

This statement is our public commitment that no slavery or human trafficking will knowingly be permitted, supported, or endorsed through our business or supply chains at any time. We commit to ensure our business practices are continuously reviewed and checked and we continue to apply a robust approach to the management of existing suppliers as well as identification and selection processes for all new suppliers to mitigate and manage any risks.

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 2022.

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

The Group purchases goods and services associated with the hospitality industry from all over the world. To name a few, these include staffing, operational supplies and equipment, furniture, fixtures, food, drinks, amenities, linen and cleaning supplies.

We select our suppliers and business partners carefully and, where possible, conduct due diligence on them, so that we are comfortable that we are doing business with trusted partners and known parties who effect business in full compliance with local law and best practice. Where we have control, we encourage all our suppliers to comply with our policies as part of our procurement tender processes and/or we expect that they will have similar policies in place.

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 on the supplier, including requiring the supplier to submit a ‘Supplier Set Up Form’. This process enables us to review an organisation’s arrangements, including any relevant policies and procedures. Our reviews will also ensure that a potential supplier has not previously been charged or convicted of any offences relating to modern slavery whether through human trafficking, slavery, child labour or otherwise.

Our Employees

In the UK and elsewhere, we operate a robust recruitment policy with comprehensive vetting procedures in place for the hiring of all new employees. Where we use external agencies to provide staff, these agencies are subject to the same procurement due diligence processes as any other supplier, and 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.

Training

To reinforce understanding and awareness of the risks of modern slavery and human trafficking in our business and its supply chains, we will be implementing a new comprehensive training programme 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 penalty. The programme will be delivered through an online portal and completion will be tracked both locally and centrally to ensure compliance.



Our Policies

Our Relevant Policies, which includes our Code of Ethics & Business Conduct, Group Human Rights Policy and Whistleblowing Policy underpin our training efforts and we have a robust governance structure in place to oversee the implementation of and compliance with these policies across our business.

We encourage our colleagues to report non-compliance with these Relevant Policies, and 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.



Key Performance Indicators (“KPIs”) and Effectiveness

We use the following KPIs, 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 or supply chains.

KPI	Progress 2021-2022
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. Continue to focus on training and upskilling our employees on modern slavery and human trafficking with regular reviews to monitor the effectiveness of the compliance programme	
3. Raising awareness of the issue of modern slavery throughout our organisation and supply chain	
4. Expanding due diligence on contractors, subcontractors and suppliers by carrying out supply chain audits which will help us to assess the risk of modern slavery and human trafficking in our supply chains	
5. Including contractual clauses that require new and existing suppliers to comply with applicable laws and our Group Human Rights Policy	
Progress Key: Developing Progressing Underway	

We acknowledge that the above KPI framework may need to be reviewed, supplemented and improved as our modern slavery programme matures. Our aim is that by the next reporting period we will have advanced in a number of these areas. As well as this, we plan to have developed additional KPIs focused on due diligence, training and raising awareness.

Future Steps

As we go forward into 2023, 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 are respected across our business and supply chains.

Should you have any concerns or comments, please email us at 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 26 June 2023.

Kwok Eik Sheng
Director