

MEININGER Hotels

Modern Slavery Statement Financial Year 2022

This statement sets out MEININGER Hotels' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

MEININGER Hotels is held by Holidaybreak Limited
Holidaybreak is a non-operational entity and hence forms part of the statement.

As part of the travel industry, we recognize that we have the responsibility to take a robust approach to slavery and human trafficking and to have processes in place to prevent or mitigate human rights issues and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure

- MEININGER Hotels Limited is held by Holidaybreak Limited based in UK. MEININGER has 31 hotels in 21 European cities and offers the ideal accommodation for city breaks, business trips, journeys around the world, family holidays or school class trips.
- MEININGER is an international hybrid hotel chain provider of accommodations with a combination of regular and multi bedded rooms, guest kitchens and game zones.
- MEININGER's headquarter is based in Berlin and is a service provider for its hotels across Europe. It supports all administrative processes such as Reservations, Sales, Marketing, Revenue Management, Procurement, Development, In-house Design, Project & Refurbishment, Facility Management, IT, Finance & Controlling, Human Resources Management and Legal & Compliance. This centralised head office structure enables MEININGER operations team to focus on guest service and ensures cost-efficient operations.

Countries of operations and supply chains

- MEININGER Hotels currently have 31 hotels in Europe in the following countries (cities): The Netherlands (Amsterdam), Belgium (Brussels), Denmark (Copenhagen), Germany (Berlin, Frankfurt am Main, Hamburg, Heidelberg, Leipzig, Munich), Austria (Innsbruck, Salzburg, Vienna), Italy (Milan, Rome), France (Bordeaux, Lyon, Marseille, Paris), Hungary (Budapest) and Switzerland (Zurich, Geneva).
- As you would expect in the hospitality sector, our suppliers fall into two broad groups – hotel suppliers and support suppliers. Hotel suppliers cover all goods and services used in the running of a hotel from food and beverages, linen and cleaning supplies to fixtures, fittings, equipment and maintenance services. Our support suppliers provide items such as office supplies, IT support and systems, professional and consultancy services.
- We also work with employment agencies who supply a limited number of people to work in our support office and hotels.
- Procurement for suppliers is managed at a central head office level. We pick our suppliers carefully through tender process where necessary and where appropriate carry out due diligence on these parties and endeavour to contractually require them to comply with applicable laws.

Anti-slavery initiatives and policies

- MEININGER's Code of Conduct sets out binding rules that are to be followed by every employee as well as consultants who are employed by any entity in the MEININGER Group. The code includes provisions to never engage in any activities that promote or encourage Bribery, slavery or human trafficking or any other misbehaviour endangering company reputation.
- We expect our contractors, suppliers and other business partners to have equivalent policies in place and the same high standards of operations, ethics and processes to avoid any risks of slavery and human trafficking. The suppliers are engaged by the procurement department in line with the Procurement Policy.
- We hire employees in line with our recruitment and internal applications policy. Furthermore, we implement 'right-to-work' checks on colleagues where necessary, undertake checks on shiftpatterns and the hours worked by our colleagues and understand the importance of focusing on having a culture of engaging in all activities with respect and fair treatment of others.
- We encourage all our employees, guests and other business partners to report any concerns related to incidents of human trafficking. We encourage our staff to SPEAK UP when they see anything that's not right. We advise them to use various communication channels available for reporting.

- We encourage open door communication and feedback about any concerns our employees may have and provide necessary channels to raise them. We have an independent external whistleblowing system in place where our employees can raise their concerns anonymously in several different languages, without fear of retaliation.
- In 2022, we reviewed this system in light of the EU Directive 2019/1937 on the protection of whistleblowers came into force on 16 December 2019. Based on the new Directive, Meininger adopted a new Whistleblowing policy dated 15 February 2022.
- We also did a Training and presentation in May 2022 for all our staff members to provide them insights into the Legal framework around Whistleblowing. New policy portraits MEININGERS commitment towards providing a safe and ethical work environment, meeting its obligations and providing guidance and clarity on when and how to raise a complaint within MEININGER.
- In 2022 we have engaged an Ombuds Lawyer, Dr. Kathrin J. Niewiarra to whom the employees can report unlawful conduct and serious irregularities committed by the Management, corporate bodies such as boards or members of the Compliance department.

Due diligence

- When taking on new suppliers in areas which we consider to be higher risk, procurement function undertakes supplier due diligence to reduce the risk of slavery and human trafficking.
- MEININGER will adopt a tool to automate the process on contract management and supplier management.
- We include contractual clauses in all our higher risk supplier agreements and also in our standard template supply agreements in relation to the monitoring and tackling of slavery and human trafficking issues and compliance with legislation.

Risk assessment and management

- A Risk assessment was undertaken within the business where slavery and human trafficking may exist. A risk rating was assigned based on the assessment of level of risks identified.
- MEININGER has a Compliance Team to whom any concerns issues can be raised and reported in addition to independent whistleblowing platform.
- The Modern slavery statement is reviewed and prepared on annual basis, placed to the Board and then published on the website.

Sustainability and Corporate Social Responsibility

- SCSR has played an important role ever since MEININGER Hotels' incorporation and it is reflected in our core values and guiding principles.
- At MEININGER Hotels we take over the responsibility for our corporate governance and are keen to strengthen our positive impacts. Through our corporate actions we want to contribute to a more environmentally and socially responsible world in the interests of the future generations.
- To drive sustainability in all business areas we have established in 2019 a centralized Sustainability Core Team (consisting of our Chief Executive Officer, Chief Operating Officer, Regional Director, VP Commerce, Head of Marketing and Communications and our Sustainability Manager).

- At the beginning of 2022, we conducted an analysis with relevant stakeholders in order to evaluate the most important issues for our hotel group in the fields of the environment, society and corporate governance. Focus areas that resulted from it:
 - Responsible consumption of energy, reduction of greenhouse gas emission, improvement of waste streams and recycling quote
 - Responsible supplier management and local sourcing
 - Diversity, inclusion and equality
 - Fair remuneration, work-life-balance and the well-being of our employee
 - Health & safety of our employees and guests
 - Transparent, credible dialogue and communication with our stakeholders
 - Mobility and innovation
 - Cyber security and the protection of sensitive guest and company data
- Based on the survey results, we are currently working on a sustainability strategy and program.

Key Performance Indicators

- We would expect that any incident of modern slavery would be a breach of our company policies, contractual terms and/or law.
- We remain committed to ongoing human rights due diligence. We continue to focus on the assessment of our supply chain and high risk areas as well as on ensuring that we do not have any modern slavery in our own business.
- We plan to enhance our training programme across the business to educate employees on modern slavery and risks associated with that.

Training

- An anti-slavery and human trafficking training presentation was provided to the senior management by means of a workshop. This was circulated further to relevant MEININGER Hotels' staff to enhance their understand and mitigate any slavery and human trafficking risks.
- In November 2021, we provided Compliance Training to Directors, Chief Executive Officer and members of the Senior Management at Meininger covering various topics including Modern Slavery, legal obligation, the risks and consequences associated with it and plan of action in setting the KPI's and increasing the diligence in order to tackle modern slavery and trafficking.
- In May 2022, an online training on the new Whistleblowing Policy how to raise a complaint within MEININGER Hotels has been provided to the entire MEININGER staff together with a hand-out and video recording for new hires.

COVID-19 measures

Health and Safety risks concerns related to workplace conditions in the context of the COVID-19 pandemic, particularly health and safety, continue to be addressed by enhanced measures and processes being put in place as hotel operations and occupancy return to higher levels. Our hotels are working to best practice COVID-specific training and operating procedures, aligned to regularly monitored advice from global health bodies.

This statement has been approved by Holidaybreak and MEININGER's board of directors, who will review and update it annually.

London, 30 September 2022

Sd/-

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