

MEININGER Hotels

Modern Slavery Statement Financial Year ending 2024

This statement (the “**Statement**”) is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 by Meininger Hotels Limited which is incorporated in England & Wales (the “**Company**”).

This statement sets out MEININGER Hotel group’s actions to understand all potential modern slavery risks related to its business. 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. We have a zero-tolerance approach to slavery and human trafficking and are dedicated to understanding the risks so that we can work towards ensuring that there is no modern slavery in our business or supply chains.

This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

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

Organisational Structure

- MEININGER has 36 hotels in 26 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 costefficient operations.

Countries of operations and supply chains

- MEININGER Hotels currently have 36 hotels in Europe in the following countries (cities): The Netherlands (Amsterdam), Belgium (Brussels), Denmark (Copenhagen), Germany (Berlin, Bremen, Cologne, Dresden, Frankfurt am Main, Hamburg, Heidelberg, Leipzig, Munich), Austria (Innsbruck, Salzburg, Vienna), Italy (Milan, Rome, Venice), France (Bordeaux, Lyon, Marseille, Paris), Hungary (Budapest), Switzerland (Zurich, Geneva) and Poland (Krakow).
- 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.
- 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.
- We also work with employment agencies who supply a limited number of people to work in our support office and hotels.

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.
- In FY 2023 - 2024, we have conducted once every month "welcome day" trainings for the new joiners at the Headquarters and at the Hotels to introduce them to the Company, its policies, systems and processes.
- 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 shift patterns 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.

Anti-slavery initiatives and policies

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 confidential whistleblowing system in place where our employees can raise their concerns anonymously in several different languages, without fear of retaliation.

We encourage our team members to seek confidential support and assistance through our dedicated well-being platform, Open Up launched recently in August 2024. This platform provides access to professional psychologists and well-being experts to help employees navigate any challenges they may encounter.

Since 2022, we engaged Ombuds Lawyer Dr. Kathrin J. Niewiarra, to whom employees can report any unlawful conduct or serious irregularities committed by the Management, corporate bodies, or members of the Compliance department. To date, she has not received any reports or complaints, which can be seen as a positive metric reflecting the effectiveness of our internal compliance and reporting systems.

Due diligence

- When taking on new suppliers in areas which higher risk, procurement function undertakes supplier due diligence to reduce the risk of slavery and human trafficking.
- This year, we have successfully implemented the Document Management System, which automates contract management and supplier management processes and facilitates thorough risk assessment of our suppliers.
- We include contractual clauses in all our higher-risk supplier agreements and 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 concerns / issues are 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

- Sustainability and Corporate Social Responsibility 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 expanded our centralized Sustainability Core Team (consisting of our Chief Executive Officer, Chief Operating Officer, Regional Director, VP Commerce, Head of Facility Management & Procurement, Head of Marketing and Communications and our Sustainability Manager).
- In 2023 we have established a centralized Diversity & Inclusion (D&I) Core Team and integrated first sustainability goals into our corporate strategy like raising awareness and educating internal supervisors and employees about D&I issues. The D&I team has conducted various training sessions across Company to educate everyone on this topic.

Sustainability and Corporate Social Responsibility

- At the beginning of 2023, 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 have started embedding sustainability into strategic decision-making and accountability structures.

- MEININGER HOTELS falls within the scope of the European Corporate Sustainability Reporting Directive (CSRD) from the financial year 2026. This requires reporting both on the financial of sustainability issues and MEININGER's effects on the environment and society in its value chain, following the double materiality approach.
- For FY 2025, we plan to conduct a double materiality analysis with our external sustainability consultant by examining our value chain and engaging with relevant stakeholders. The aim is to identify our key environmental, social and governance matters to meet the ESRS European Sustainability Reporting Standards.
- Going forward, we aim for an integrated approach to the value chain to ensure that both financial and non-financial impacts are managed and that MEININGER's activities are aligned with sustainability goals and regulatory requirements.

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

- In May 2022 and in monthly onboarding, online training on the Whistleblowing Policy and how to raise a complaint within MEININGER Hotels is being provided to the staff together with a hand-out and video recording for new hires.
- Signs of slavery, importance of whistleblowing policy and various reporting channels availability is reiterated by the Legal & Compliance team in their presentation to the new joiners in monthly “welcome day” training sessions. For the upcoming FY, we aim to create a training specifically focused on modern slavery awareness within our internal Learning Management System and make it mandatory for all employees to complete.

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

London, 17th September 2024

Sd/-

Ajit Menon | Chief Executive Officer

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