

MEININGER Group¹

Modern Slavery Statement Financial Year 2025

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 2024 to 31 March 2025.

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

¹ The MEININGER Group includes all existing MEININGER entities in operation, as well as hotels currently in the pipeline, under MEININGER Hotels Ltd. These include, among others, the locations that are part of MEININGER Holding GmbH and MEININGER Hotel Europe Ltd.

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 cost-efficient 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, Frankfurt am Main, Hamburg, Heidelberg, Leipzig, Munich), Austria (Innsbruck, Salzburg, Vienna), Italy (Milan, Rome, Venice), France (Bordeaux, Lyon, Marseille, Paris), Hungary (Budapest) and 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. Our suppliers in both groups are mainly based in Europe.

- 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. In this FY, our procurement department has launched a new online purchase management system which assists to have all suppliers listed on a centralised system and having procedures for reviewing and identifying supply chain related risks via questionnaires.
- Also, our procurement team periodically reviews sectors and geographies where risks regarding modern slavery and human trafficking are prevalent and avoid conducting any business in those regions, nor engaging with suppliers operating in those regions. In the upcoming financial years, we aim to set a formalized risk mapping process with collaboration of third-party experts and stakeholders.

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 2024-2025, 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. Furthermore, we store and make available to employees all policies in an easily accessible manner.
- 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 also have a Whistleblower Policy that encourages our employees to raise any concerns and report any violations, without the fear of retaliation. This Policy supports MEININGER's dedication to a safe, ethical workplace and its responsibilities to stakeholders, the community, and the environment.
- We also 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 without fear of retaliation. In FY 2024-2025, we upgraded this system with an external service provider EQS with minimal changes for the employees. The new system is more user-friendly and assists in effective case management.
- We also encourage our team members to seek confidential support and assistance through our dedicated well-being platform, Open Up launched 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 have engaged an external and independent Ombuds Lawyer, Dr. Kathrin J. Niewiarra to whom the employees can via a hotline and email address 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.
- In FY 2024-2025 we continue to include contractual clauses relating to monitoring and tackling of slavery and human trafficking issues in all our higher risk and in our standard template supply agreements. In addition, we adopted a direct interaction approach where procurement guidelines and policies are shared and reinforced during supplier onboarding and periodic reviews.

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 and external ombuds lawyer.
- The Modern slavery statement is reviewed and prepared on annual basis, placed and approved by 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 Steering Committee (consisting of our Chief Executive Officer, Chief Operating Officer, VP People, VP Commerce, Head of Facility Management & Procurement, Head of Marketing and Communications and our Sustainability Manager).

- In 2024, a double materiality assessment in preparation for the upcoming new Corporate Sustainability Reporting Disclosure was carried out.
- As part of our commitment to responsible business practices, the Sustainability Steering Committee conducted a comprehensive assessment of environmental and social impacts, using both quantitative and qualitative data and benchmarking against industry standards. Guided by an external sustainability consultant, we engaged internal experts and key stakeholder groups—including suppliers, shareholders, property owners, tour operators, academics, and NGOs—to identify and document environmental, social, and financial risks and opportunities.
- Among various ESG topics, social-related impacts—including those within our own operations and supply chain—were identified as critical, with a particular focus on responsible supply chain management. We recognize that precarious employment practices such as irregular working hours and insufficient living wages—especially in relation to subcontracted labor in the hospitality industry—pose a material risk of human rights violations for MEININGER.
- Social risks and opportunities are integrated into our strategic planning processes and informed by ongoing market assessments. Our board of directors provides oversight and ensures that investments in sustainable innovation align with MEININGER's long-term objectives and ethical responsibilities.
- 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.
- Recently in July 2025, our Human Resources department adopted a new labor monitoring and payroll system which for the upcoming year will provide us a better insight on our effectiveness ensuring that modern slavery and human trafficking is not taking any place.
- Although in FY 2024-2025, we did not identify any forced labor or child labor in our activities and supply chains and were not required to take any remediation measures, for the upcoming financial year, with adoption of e-procurement system we will gather relevant data and adopt an effective analysis with a better structured KPI's which will allow us to map where we stand against modern slavery and human trafficking.

Training

- Regular training on the Whistleblowing Policy and how to raise a complaint within MEININGER Hotels are being provided to the staff in onboarding sessions together with a hand-out and video recording from the past.
- 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.

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

London, September 2025

Sd/-

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