MEININGER Group[1]

Modern Slavery Statement

Financial Year 2026

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 2025 to 31 March 2026.

MEININGER Hotels Limited is ultimately held by Holidaybreak Limited. Although Holidaybreak Limited does not carry out operational activities, it is included within the scope of this Modern Slavery Statement.

1 The MEININGER Group includes all existing MEININGER entities in operation, under MEININGER Hotels Ltd as of the date of this report. These include, among others, the entities that are part of MEININGER Holding GmbH and MEININGER Hotel Europe Ltd.

Holidaybreak plc

MEININGER HOTELS

Organisational Structure

- MEININGER has 38 hotels in 28 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 operate 38 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), Spain (Barcelona), Scotland (Edinburgh), France (Bordeaux, Lyon, Marseille, Paris), Hungary (Budapest), Switzerland (Zurich, Geneva) and Poland (Krakow).

- Suppliers fall into two broad groups: hotel suppliers, covering the goods and services used to operate a hotel, including food and beverages, linen, cleaning supplies, fixtures, fittings, equipment and maintenance; and support suppliers, including office supplies, IT, professional and consultancy services. Most suppliers are based in Europe.

- We also work with employment agencies that supply a limited number of people to our support office and hotels.

- During FY26, the MEININGER Procurement Team continued the phased implementation of a new Supplier Management System, introducing more structured supplier onboarding, approval of new suppliers, standardised supplier information and purchasing approval workflows. This provided a stronger foundation for supply-chain transparency and risk-data collection.

- In FY27, it is planned to develop documented supplier-risk segmentation with support from relevant experts and stakeholders.

Anti-slavery initiatives and policies

- MEININGER's Code of Conduct sets out binding rules for employees and consultants engaged by any entity in the MEININGER Group. It prohibits activities that promote or encourage bribery, slavery, human trafficking or other misconduct that could endanger the company's reputation.
- During FY25/26, monthly "welcome day" training introduced new joiners at headquarters and hotels to the Company, its policies, systems and processes. Policies are stored and made readily accessible to employees.
- During FY25/26, MEININGER published its Standard Terms and Conditions of Purchase on the Supplier Management platform, which include Modern Slavery Act provisions and are published on the MEININGER Supplier-Information webpage. MEININGER expects its contractors, suppliers and business partners to maintain equivalent standards in compliance with Modern Slavery Act, 2015.
- Employees are hired in line with our recruitment and internal-applications policy. Where necessary, we conduct right-to-work checks and review shift patterns and hours worked, supporting a culture of respect and fair treatment.
- Our Whistleblower Policy encourages employees to raise concerns and report violations without fear of retaliation. It supports MEININGER's commitment to a safe, ethical workplace and its responsibilities to stakeholders, the community and the environment.

Anti-slavery initiatives and policies

- We also encourage open-door communication and feedback about any concerns our employees may have and provide necessary channels to raise them. We provide an independent third-party external whistleblowing system that is user-friendly and assists in effective case management, where our employees can raise their concerns anonymously without fear of retaliation.
- We also encourage our team members to seek confidential support and assistance through our dedicated well-being platform. This platform provides access to professional psychologists and well-being experts to help employees navigate any challenges they may encounter.
- There is also an external, confidential and independent hotline and email address to report unlawful conduct and serious irregularities committed by the Management, boards or members of the Compliance department.

Due diligence

- MEININGER applies a proportionate, risk-based supplier due diligence approach to higher-risk and labour-intensive procurement categories. In FY25/26, enhanced due diligence activities focused on housekeeping services, linen services, and selected FF&E suppliers.

- Relevant supplier contracts include modern slavery and labour rights provisions requiring appropriate due diligence throughout the supplier and subcontractor chain, notification of relevant risks or incidents, workforce training, and access to records supporting compliance. Assessment criteria for housekeeping and linen suppliers also covered labour-law and minimum wage compliance, subcontracting arrangements, ethical sourcing practices, and supply chain transparency. Where appropriate, contracts incorporate enhanced verification requirements and contractual consequences for non-compliance with collective bargaining agreements, minimum wage requirements, or other applicable labourstandards.

Risk assessment and management

- Risk assessments relating to potential slavery and human trafficking risks are conducted as appropriate, taking into account the nature of the business activities, operations and supply chain. Where relevant risks are identified, they are assessed and prioritised based on their nature and potential impact.

- MEININGER has a Compliance Team to which concerns can be reported, in addition to the independent whistleblowing platform and external ombuds lawyer.

- The Modern Slavery Statement is reviewed annually, approved by the Board and published on the website.

Sustainability and Corporate Social Responsibility

- MEININGER Hotels in recent years has conducted a double materiality assessment as part of its sustainability reporting preparations for the CSRD. The assessment considered a range of environmental, social and governance topics and included engagement with internal stakeholders and external stakeholder groups, including suppliers and business partners.

- The outcomes of this process contributed to our understanding of sustainability-related risks and opportunities, including human rights considerations relevant to our operations and supply chain.

- In parallel, MEININGER Hotels continued to enhance sustainability and human rights considerations within selected procurement categories. Within the linen category, supplier requirements were further developed through sustainability and ESG reporting expectations, together with the consideration of textile certifications, ethical sourcing practices and transparency regarding subcontracting arrangements.

- Going forward, we aim to continue strengthening our understanding of human rights risks and to further integrate relevant findings into our risk assessment and due diligence processes.

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 place.
- Although no instances of forced labour or child labour came to our attention during the FY, we continue to enhance our approach to identifying and assessing potential risks. The phased implementation of the e-procurement system is expected to improve the availability of relevant data and support the development of more structured KPIs and risk-monitoring processes in relation to modern slavery and human trafficking.
- Development of a Group Supplier Code of Conduct also remains a priority and under development for upcoming financial year.

Training

- Awareness and training on the Whistleblowing Policy and how to raise a complaint within MEININGER Hotels are being provided to the staff where required.
- Signs of slavery, the importance of the whistleblowing policy and various reporting channels are reiterated by the Company to the new joiners.

This statement has been approved by Meininger Hotels Limited's board of directors on behalf of the Group, which will review and update it annually.

London, 30 September 2026

Sd/-

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