



**MEININGER**

The urban traveller's home.

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## Director's Statement – Modern Slavery Act 2015 (the 'MSA Act')

### Introduction

This statement sets out MEININGER's 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 2015 to 31 March 2016.

As part of the travel industry, MEININGER recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

MEININGER is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of MEININGER:

MEININGER is a subsidiary of Holidaybreak Limited, the European Education & Leisure specialist activity travel group. Holidaybreak Limited is a subsidiary of Prometheon Holdings (UK) Limited, which is a part of the Cox & Kings Group. Cox & Kings Limited is listed on National Stock Exchange and BSE Ltd and also on Luxembourg Stock Exchange. MEININGER provides accommodations and is an international budget hotel with a combination of regular and multi-bedded rooms, guest kitchens and game zones. Target groups are school groups, families, individual travelers and corporate guests. Within the hotels, housekeeping and catering is outsourced and provided by external suppliers. MEININGER's headquarters is a service provider for its hotels and located in Berlin. It supports all administrative processes such as Sales, Marketing, Revenue Management, Reservations, IT, Finance & Controlling, Human Resources Management, In-house Design, Preopening and Facility Management. In the construction and maintenance field we also work with external suppliers.



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### **Countries of operation and supply**

MEININGER currently operates 16 hotels in Europe in following cities/countries: Amsterdam /The Netherlands, Brussels/ Belgium, Frankfurt, Hamburg, Cologne, Berlin, Munich / Germany, London, United Kingdom, Salzburg and Vienna / Austria

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### **Risk Assessment Process**

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

MEININGER is currently working on a new procurement policy which will also include Procurement via a Request for Procurement (RfP), supported by clear specifications against which the offers from prospective suppliers of the required goods or services can be objectively evaluated. The procedure and guide line of the Procurement policy will apply to the purchase of any products/services from existing or new suppliers and to contract renewals, including of maintenance contracts.

MEININGER will also modify its General Terms and Conditions to include a provision that any company that provides goods or services to MEININGER certifies that it is in compliance with the MSA Act and other international conventions against child labour and human trafficking.

Furthermore MEININGER is currently renewing existing contracts with suppliers to cover the MSA Anti-Slavery & Human Trafficking Policy which has been circulated by its parent company on 19<sup>th</sup> July 2016.

A Slavery Risk form detailing potential roles and areas within the business where slavery and human trafficking may exist was completed by the Product team (Risk Consultant and Chief Operating Officer). A risk rating system (1 low risk, 5 high risk) was allocated to each potential risk.

Modern Slavery Act meetings have taken place across the business, including the attendance at a senior management workshop with external consultants as well as a 'top up meeting' where the MEININGER action plan was set out.

### **High-risk activities**

Following an analysis of the Slavery Risk form by the Risk Consultant and Chief Operating Officer Team, the following activities are considered to be at risk of slavery or human trafficking:

- High risk activities are considered as hotel cleaners, housekeeping staff, laundry staff, hotel constructions staff, excursion staff, food suppliers and furniture suppliers.
- Medium to high risk activities are considered as tour guide staff.
- Low risk activities are deemed to be kitchen staff, restaurant/bar staff and rubbish disposal staff.

### **Responsibility**

Responsibility for MEININGER's anti-slavery initiatives is as follows:

- **Policies:** The Chief Operating Officer, Eric van Dijk, has led a proactive and robust internal MSA project and has attended a workshop held at parent level by external consultants.



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- **Risk assessments:** A risk assessment in the form of a 'Slavery Risk' form was distributed from MEININGER's parent company's legal and corporate team, however overall responsibility and involvement remains with MEININGER. Any additional risk assessments of the supply chain will be under the responsibility of the Product team (Risk Consultant and Chief Operating Officer) at MEININGER.
- **Investigations/due diligence:** The Health & Safety team is responsible for the due diligence investigations comprising of ensuring audits are in place. They remain responsible for investigations and due diligence in relation to any suspected instances of slavery and human trafficking.
- **Training:** An anti-slavery and human trafficking training presentation (including an internal group memo, presentation video and supporting guidance documents) has been attended by senior management by means of a workshop, proving the methodology of how MEININGER can adhere to the Act. This is planned to be circulated to include further relevant MEININGER staff, with a view to potentially circulating it to suppliers and other interested parties to better understand and respond to the identified slavery and human trafficking risks, even if they are at a low level.

### Relevant policies

MEININGER operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Anti-Slavery and Human Trafficking Policy** In accordance with the MSA Act, MEININGER has adopted a group led policy relating to anti-slavery and human trafficking. The policy confirms MEININGER's commitment to tackling slavery and human trafficking throughout our supply chains and to ensuring transparency in MEININGER's business. We expect the same high standards from all our contractors, suppliers and other business partners. MEININGER includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.
- **Anti-Bribery & Whistleblowing policy** A new Policy was circulated to MEININGER staff on behalf of its parent company in July 2016. MEININGER encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, MEININGER. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. MEININGER's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **A Code of Conduct** MEININGER will include their code of conduct within MEININGER'S staff guide book and circulate to all relevant staff.

All policies are available for staff members to view on MEININGER's internal intranet.

### Due diligence

A due diligence process will be partly embedded in the new procurement policy at MEININGER.

### Key Performance indicators

MEININGER has started to review its key performance indicators (KPIs) in light of the introduction of the MSA Act. As a result, MEININGER is creating specific KPI's to measure supplier effectiveness and compliance following the implementation of the MSA Act by:

- developing a system for supply chain verification in place since June 2016, whereby the organisation evaluates potential new suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by May 2019, whereby the organisation evaluates all existing suppliers.





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## Training

MEININGER will require Product Managers, HR professionals, Customer Relations and Health & Safety teams within MEININGER to complete training on modern slavery upon induction and, if appropriate, on regular occasions over the coming year.

MEININGER's modern slavery training will cover:

- the basic principles of the MSA Act;
- a MSA Act training presentation (including a video presentation, memo and supporting guidance documents), giving the methodology of how we as a business ensure adherence to the MSA Act;
- MEININGER's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- what steps should be taken if slavery or human trafficking is suspected; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

## Awareness-raising programme

As well as training senior management staff, MEININGER plan to roll out an awareness –raising programme by circulating a series of emails and memos to staff throughout the year.

The briefings would explain to staff:

- the basic principles of the MSA Act and how it impacts MEININGER;
- how employers can identify and prevent slavery and human trafficking; and
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within MEININGER.

## Board approval

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

Berlin, 15.09.2016



Hannes Spanring  
Chief Executive Officer  
MEININGER Hotels