



# GENTING

UNITED KINGDOM

## **MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Genting UK Plc ("Genting") and its subsidiary companies for the financial year ending 31<sup>st</sup> December 2024.

### **Overview**

Genting remains committed to combating slavery and human trafficking. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

### **Our Supply Chain Risk Assessment**

We consider that our business remains at a relatively low risk of slavery and human trafficking given that we operate in the leisure industry and most of the roles we offer and services, we require our suppliers to be highly regulated or require technical or industry-specific skills. Our Facilities Maintenance providers have their own checks for their direct employees to ensure that they are compliant with Modern Slavery and Human Trafficking regulations and any third-party companies they use, are also verified, and audited by their supply chain team, with final approval by their Company's Directors. Our other supply chains include IT and technology, marketing, professional services, food and beverage, software, hardware and with these we implement stringent contractual standards through audits, due diligence as well as requiring such providers to confirm that they have policies in place relating to anti-slavery and human trafficking.

For our refurbishment work across the UK estate, our JCT contracts with our refurbishment providers, include a specific addendum relating to slavery and human trafficking which is required to be signed by their directors confirming that their company has policies in place relating to anti-slavery and human trafficking and warrants that the Company has not been convicted of any offense involving slavery and human trafficking.

### **Our Policies and Controls**

We are committed to ensuring a safe working environment that is free from modern slavery and trafficking.

We have a comprehensive suite of employee responsibility policies that are relevant to our attempts to ensure that there is no modern slavery in any part of our workforce. Our relevant policies include:

- Whistleblower Policy;
- Harassment and Bullying Policy;
- Equal Opportunity Policy;

### **Genting UK Plc**

Registered Office:  
Genting UK Plc,  
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Registered in England No. 01519749



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- Diversity and Inclusion Policy;
- Respect at work charter" which aims to ensure all our staff feels respected and valued

We have designated responsibility to an administrator at each operational site to conduct right-to-work and reference checks against all new employees and we ensure that all staff involved in recruitment are aware of their obligations in relation to anti-slavery and human trafficking. We apply our employment practices in line with legislation, including in respect of the National Minimum Wage and National Living Wage and the elimination of discrimination in the workplace.

Our Equal Opportunity Policy ensures that all our employees are exposed to equal opportunity irrespective of their race, nationality, ethnic origin, disability, sex etc. and our Diversity and Inclusion Policy ensures our commitment towards a non-discriminatory approach and provide equal opportunities for employment and advancement across our organisation. Our HR business partners provide advice and guidance to our operational units on such matters and our payroll systems records that we have received eligibility to work documents.

## **Education and Training**

To promote understanding of the risks presented by slavery and human trafficking we provide training to our staff as part of their corporate social responsibility training, and we have made anti-slavery and human trafficking educational material available on our internal training academy so that it can be accessed and viewed by all staff. We supplement this training with specific policies on other social and ethical issues such as anti-bribery and corruption, anti-harassment and bullying. We also maintain the "whistleblowing hotline" which allows staff to raise any concerns they have confidentially.

## **Effectiveness and Performance Review**

We assess any instances of non-compliance with our policy on a case-by-case basis and consider due diligence and audits if required.

In relation to at-risk suppliers, we have due-diligence systems and other policies and checks to ensure that we only trade with those who comply with this policy or who are taking verifiable steps towards compliance with it.

Regarding our employment practices, we monitor and review Whistleblower Policy and Harassment and Bullying Policy and Work Charter and ensure that their complaints and/or concerns are properly addressed and resolved.

We do not have Key Performance Indicators in place as of now considering low-risk exposures, but it is kept under review.

This statement has been approved by the board of Genting UK Plc on 21<sup>st</sup> February 2025 and is signed by Paul Willcock on the board's behalf.

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