

The Foundation Group of Companies

Modern Slavery and Human Trafficking Statement 2027

Introduction

The Foundation Group of Companies is committed to conducting business ethically, responsibly and with respect for human rights. We have a zero-tolerance approach to modern slavery, forced labour and human trafficking and are committed to taking reasonable and proportionate steps to minimise these risks across our business and supply chains.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the actions taken during the financial year ending 31 March 2026.

Companies Covered

This statement applies to:

- The Foundation Group of Companies Limited
- Glendola Leisure (Holdings) Limited
- Glendola Leisure Limited
- Glendola Leisure 2 Limited
- Glendola Irish Bars Limited
- Hotel Management International (Holdings) Limited
- Hotel Management International Limited
- Carlton Hotels Nederland BV
- Oostduinhaghe Hotel BV
- Spijkenisse Hotel BV
- Haarlem Hotel BV
- Hotel Exploitatie Mij Maarssenbroek BV
- Carlton Ambassador Hotel BV
- De Brug BV
- Hotel Exploitatie Mij Anfra BV
- Carlton Hotel Brussels BV

Together these companies operate hotels, bars, restaurants and hospitality venues throughout the United Kingdom, the Netherlands and Belgium.

Our Commitment

We believe everyone has the right to work in an environment that is safe, fair and free from exploitation.

We are committed to maintaining ethical employment practices throughout our operations and expect the same standards from those who work with us. We recognise that modern slavery risks can exist within the hospitality industry and remain committed to continually reviewing our practices to identify and mitigate those risks.

Our Approach

To support this commitment we:

- maintain policies that promote ethical working practices;
- undertake appropriate right-to-work and recruitment checks;
- work with reputable suppliers and contractors;
- assess potential modern slavery risks within our supply chains;
- provide guidance and awareness for relevant employees; and
- encourage employees and business partners to report concerns through our confidential reporting procedures.

These measures form part of our wider governance framework and are reviewed regularly to ensure they remain effective and proportionate.

Supply Chain and Risk Management

Our supply chain supports a diverse range of hospitality operations and includes food and beverage suppliers, cleaning contractors, maintenance providers, agency labour, professional services and hospitality equipment suppliers.

We recognise that certain labour-intensive services and outsourced activities may present increased risks. We therefore seek to work with suppliers who share our commitment to ethical employment practices and responsible business conduct.

Where appropriate, we review supplier relationships and encourage compliance with applicable employment legislation and recognised ethical standards.

Training and Awareness

We continue to raise awareness of modern slavery across the business by providing guidance to managers and relevant employees, particularly those involved in recruitment, procurement and operational management.

Employees are encouraged to remain vigilant and report any concerns through established management or whistleblowing channels.

Monitoring and Continuous Improvement

Preventing modern slavery is an ongoing process.

During the year we continued to:

- review relevant policies and procedures;
- assess potential supply chain risks;
- monitor recruitment practices;
- support employee awareness;

We remain committed to continually improving our approach as our business and supply chains evolve.

Approval

This statement has been approved by the Board of Directors of The Foundation Group of Companies and will be reviewed annually.

Peter Salussolia

Chairman

April 2026