



LEONARDO HOTELS UK AND IRELAND

Modern Slavery and Human Trafficking Statement

INTRODUCTION

This statement is prepared for the purposes of Section 54(1) of the Modern Slavery Act 2015 and forms our slavery and human trafficking statement for the financial year ended 31 December 2024.

Leonardo Hotels UK and Ireland is committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of slavery and human trafficking taking place within the business or our supply chain.

This statement sets out the steps taken by Leonardo Hotels UK and Ireland during the past financial year, to help prevent slavery and human trafficking within our business and its supply chain. Leonardo Hotels UK and Ireland views the steps being taken as an evolving process and will continue to monitor and review its risk profile to improve and strengthen its practices going forwards.

OUR STRUCTURE

Leonardo Hotels UK and Ireland comprises the following separate and distinct entities (and their wholly owned subsidiaries):

- Leonardo Hotel Management (UK) Limited 03447849;
- Fattal Leonardo Hotels (UK) Limited 09237813;
- Speedbird Developments Limited SC110805;
- Fattal Leonardo Operation (Ireland) Limited 614405;
- Fattal Piccadilly Limited SC074783;
- Brighton Grand Hotel Operations Limited 08935930;
- Hotel Gotham Limited, 08948823;
- Rockyvale Limited 561774; and
- Niche Hotels Unlimited Company 375499.

This statement is made on behalf of all of the 9 above entities (and their wholly owned subsidiaries).

Leonardo Hotels UK and Ireland is a full-service hotel group operating within the hospitality sector across the UK and Ireland under the following brands:

- Leonardo
- Leonardo Royal
- Nyx
- The Midland
- The Dilly
- The Grand
- The Gotham

- The g

During 2024, we have added 3 hotels to our portfolio:

- In May 2024 Hotel Gotham Limited was acquired by the group. The Gotham, situated in the heart of Manchester, is presented as a plush 60 bedroom hotel, with an exclusive club bar and a fabulous dining venue, employing 90 people.
- In June 2024 Niche Hotels Unlimited Company was acquired by the group, adding The g hotel to the portfolio. The g remains the only luxurious, 5-star experience in the iconic city of Galway with 101 bedrooms and 130 employees.
- In August 2024 The Hardrock in Dublin was rebranded to the Nyx Hotel Dublin Christchurch with the acquisition of Rockyvale Limited, adding 120 bedrooms and 70 employees to the group.

In the subsequent months and throughout 2025 the hotels will be fully integrated into the business with processes, policies and training focussed on the prevention of Modern Slavery aligned to those in place across Leonardo Hotel UK and Ireland, as detailed within this statement.

In total, we now operate 50 hotels in the UK and seven in Ireland with over 12,000 rooms between them, employing over 5,000 people. We offer great value, stylish and comfortable 4 and 5-star accommodation year round, with onsite dining, within our predominantly city centre locations throughout the UK and Ireland. We do not recognise a trade union.

Our company head offices are in Birmingham, Watford and Dublin.

Responsibility for tackling modern slavery resides with our board of directors along with the individuals listed below:

- Lauren Sargent, Group Human Resources Manager
Policies, training, recruitment supplier's compliance and auditing
- Bobby Fitzpatrick, Head of Group Procurement
Supplier compliance and auditing
- Adrian Bingham, Head of Customer Contact and Data Integration
Third party relationships

OUR SUPPLY CHAINS

We select our suppliers and business partners carefully and, where possible, conduct due diligence on them, so that we are comfortable that we are doing business with trusted partners and known parties who effect business in full compliance with local law and best practice. We encourage all of our suppliers to comply with our policies, often by raising awareness of our policies as part of our procurement tender processes and/or we expect that they will have similar policies in place.

Leonardo Hotels UK and Ireland expects all of its suppliers, contractors and service providers to act ethically and with integrity and to have in place effective systems, safeguards and controls to ensure modern slavery is not taking place anywhere in their own business or in their supply chains. Leonardo Hotels UK and Ireland operates and maintains preferred supplier lists.

Before any new supplier, contractor or service provider is approved, Leonardo Hotels UK and Ireland, carries out appropriate due diligence on the supplier, including requiring the supplier to submit a "Supplier Set Up Form". As part of this process, Leonardo Hotels UK and Ireland, carries

out an online search to ensure that an organisation has not been convicted of any offences, including, but not limited to, offences relating to modern slavery whether through human trafficking, slavery, child labour or otherwise.

Our suppliers of outsourced employees to our hotels are expected to sign up to and agree to the terms of Leonardo Hotels UK and Ireland Anti-Slavery Compliance Agreement in respect of agency workers, where they are required to confirm that they understand and comply with the Modern Slavery Act 2015.

We continue to evolve and improve our 'Brand ambassador' programme and our recruitment team support in sourcing candidates for hard to fill vacancies, improving direct candidate attraction and reducing the need for third party agencies.

OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING

To help prevent modern slavery or human trafficking in our business and supply chains, we have adopted a Modern Slavery & Human Trafficking Policy. Our Modern Slavery & Human Trafficking Policy reflects our commitment to acting ethically and with integrity, and to implementing effective systems and controls to help ensure slavery and human trafficking is not taking place in our business and supply chains. We will monitor and update this Modern Slavery & Human Trafficking Policy as necessary going forwards.

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies include:

- **Modern Slavery & Human Trafficking Policy:** This policy sets out our commitment to modern slavery prevention, steps for managing risk and explains how employees can identify and report any concerns.
- **(Employee) Code of Conduct:** The Code of Conduct explains the way we behave as an organisation and details the core values and duties that we expect all stakeholders and employees to adhere to. All employees are responsible for reading, understanding, and complying with the principles as outlined in the Code of Conduct. A full copy of the Code of Conduct is issued to all new employees for signature during either their on-boarding or induction. The Code of Conduct is also covered in the Employee Handbook and can be found on various intra and extranet sites, as well as paper copies being available in the Human Resources department.
- **Reporting Concerns:** Employees are encouraged and asked to report genuine concerns that they may have over possible violations to the Code of Conduct or any other concerns that they feel are unlawful or unethical. Concerns may be reported to any manager or anonymously through Ethicspoint, our external whistleblowing hotline. Such concerns will be kept confidential by us to the extent that the law permits.
- **Recruitment Policy:** We have a Recruitment Policy that outlines the processes to follow when recruiting, including conducting Right to Work Checks and a prospective employee's eligibility to work in the UK and Ireland. The Recruitment policy will be reviewed and updated in 2025.
- **Group Health and Safety Policy:** We have a Group Health and Safety policy that sets out how we ensure we fulfil our obligations with all relevant Health and Safety legislation

- **Whistleblowing policy:** We have a Whistleblowing policy which outlines how to raise any concerns and our commitment to confidentiality, safeguards and action as a result of whistleblowing.
- **Diversity, Equity and Inclusion policy:** In 2024 we launched our Diversity, Equity and Inclusion policy, outlining our commitment to DEI and expectations of our team, guests and suppliers in showing each other dignity and respect at all times.
- **Sexual harassment policy:** In 2025 we will launch our Sexual Harassment policy, outlining our expectations in this area along with reporting methods.

DUE DILIGENCE PROCESSES FOR MODERN SLAVERY & HUMAN TRAFFICKING

We have assessed the only potential area of material risk associated with modern slavery and human trafficking being within our supply chain, and as part of Leonardo Hotels UK and Ireland's commitment to identify and mitigate modern slavery risks, we will continue to build long-standing relationships with our suppliers and make clear our expectations of them and their business behaviour. We primarily address risk by reviewing internal controls and training, and by actively working with our suppliers and issuing Agency Compliance Agreements to all suppliers of our permanent workforce as part of our due diligence process. Our process operates as follows:

- In the first instance, Leonardo Hotels UK and Ireland ask that all recruitment agencies of permanent employees sign and agree to the Agency Compliance Agreement. Any new agency that Leonardo Hotels UK and Ireland is looking to engage will be requested and expected to sign the Agency Compliance Agreement (if applicable);
- Leonardo Hotels UK and Ireland currently work with three main outsourcing companies. These companies have signed the Agency Compliance Agreement and audits have been, and will continue to be, carried out at regular intervals;
- As regards our national or international supply chains, our point of contact is preferably with a UK or Irish company or branch. We expect that each of those entities will have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at the very least, adopt 'one-up' due diligence on the next link in the supply chain. It is not practical for us (and every other participant in the supply chain) to have a direct relationship with all of the links in the supply chain, such as the ultimate producer, manufacturer or service provider. We, nevertheless, consider our approach to be reasonable and proportionate to tackle the risks;
- The tendering of new contracts includes an obligation that suppliers comply with the Modern Slavery Act 2015;
- To ensure an understanding of the potential risks of modern slavery in delivering our services and managing our supply chain, we do, and will continue to, provide training for our employees;
- We have internal systems in place to encourage the reporting of concerns and the protection of those employees via Ethicspoint;
- We operate to high ethical standards; and

- We ensure equal treatment of employees to prevent discrimination.

TRAINING

- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and its supply chains, we continue to provide training for our employees in order that they can identify potential signs of modern slavery, human trafficking or child grooming and sexual exploitation and, if necessary, report them without fear of penalty. Modern Slavery training is part of our 3 month BELONG company induction programme for all employees. The programme is delivered online through our GROW people portal to ensure maximum access for all employees; with a quiz to test understanding along with annual refresher training to ensure ongoing focus on this important topic. Completion is tracked both locally and centrally to ensure compliance.
- September is our annual focus month for completion of Child Sexual Exploitation, Human Trafficking and Modern Slavery in which we roll out refresher training through Learning Bites, including direct messages sent to all employees on the company communication app "Leapp".
- In 2023 we relaunched our updated right to work training modules for all hiring managers to ensure they are adept at checking eligibility to work in the UK and Ireland, and have continued to review and update these modules throughout 2024 in line with government guidance.
- In 2024 we continued our work on our 'Select the best' training for hiring managers, ensuring quality and compliant hiring practices. This will be completed in 2025.
- In 2024 we published our Diversity, Equity and Inclusion (DEI) training module, highlighting the responsibility of all employees in treating everyone equally and with fairness, dignity and respect and preventing discrimination, harassment and sexual harassment.

MEASURING EFFECTIVENESS

Leonardo Hotels UK and Ireland uses the following measures, amongst others, to monitor and assess how effective we have been as a business at ensuring that modern slavery and human trafficking is not taking place within our business or supply chains:

- Hotel Audits reviewing the appropriateness of existing controls;
- The use of effective labour monitoring procedures and payroll systems;
- An assessment of the level of communication and personal contact with the next link in the supply chain, and to ensure that we have their full understanding and compliance with the Act and our expectations of them in relation to it;
- In 2024 we continued to complete Modern Slavery audits of a selection of our outsourcing suppliers who have workers based on our sites. All suppliers audited to date were found to be exercising best practice initiatives in all areas of Modern Slavery compliance and in line with their commitment to our Agency Compliance agreement.

Audits of our main overseas outsourcing companies have been carried out by our employees, employees of the outsourcing companies and third party auditors. Each third party site in Albania and Cebu were audited twice by method of site visit by our employees

CORPORATE RESPONSIBILITY

Leonardo Hotels UK and Ireland believe in increased transparency in how businesses are playing their part in preventing slavery and human trafficking. We will continue to monitor the effectiveness of our compliance programme. We will publish an updated Modern Slavery Act Transparency Statement each financial year.

Responsibility for Leonardo Hotels UK and Ireland compliance with the Modern Slavery Act lies on an operational basis with our Board of Directors. This statement is issued with the approval and consent of the Board of Directors of Leonardo Hotels UK and Ireland (including the five companies referenced in the structure section of this statement) and have duly authorised the below named signatory to sign it on their behalf.



Darren Guy

- **Director, Leonardo Hotel Management (UK) Limited, Fattal Leonardo Hotels (UK) Limited, Speedbird Developments Limited, Fattal Leonardo Operation (Ireland) Limited, Fattal Piccadilly Limited and Brighton Grand Hotel Operations Limited, Hotel Gotham Limited, Rockyvale Limited; and Niche Hotels Unlimited Company.**

For and on behalf of Leonardo Hotels UK and Ireland

Dated 7th May 2025