

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 2025.

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

OUR STRUCTURE

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

ENTITY	COMPANY REGISTRATION
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
Gala Master (UK) Limited	14754048
Rockyvale Limited	561774
Niche Hotels Unlimited Company	375499

This statement is made on behalf of all of the 10 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
- Leonardo Limited Edition
- Master

For the 3 hotels (and operating companies) added to our portfolio/group in 2024, we completed full integration of processes, policies, and training focused on preventing Modern Slavery, aligning them with those in place across Leonardo Hotel UK and Ireland, as detailed in this statement, throughout 2025.

In the UK, we operate 50 hotels and 3 serviced apartment sites, and in Ireland, we operate 7 hotels with over 12,000 rooms combined, employing over 5,000 team members. We offer great-value, stylish, and comfortable 4- and 5-star accommodation year-round, with on-site dining, in our predominantly city-centre locations throughout the UK and Ireland. We do not recognise a trade union.

Our company's head offices are located in Birmingham, Watford and Dublin. Responsibility for tackling modern slavery resides with our board of directors, along with the individuals listed below:

- **Giovanni Andrew, Group Human Resources Manager:** policies, training, recruitment, suppliers' 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 doing business with trusted partners and known parties who operate 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 them during our procurement tender processes, and/or we expect them to 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. Additionally, 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 approving any new supplier, contractor, or service provider, Leonardo Hotels UK and Ireland conducts appropriate due diligence, 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 the Leonardo Hotels UK and Ireland Anti-Slavery Compliance Agreement in respect of agency workers, and 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 supports sourcing candidates for hard-to-fill vacancies, improving direct candidate attraction and reducing reliance on 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 are not taking place in our business and supply chains. We will monitor and update this Modern Slavery & Human Trafficking Policy as necessary.

We maintain several internal policies to ensure we conduct business ethically and transparently.

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.
- **Code of Conduct (Employee):** 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 Code of Conduct's principles.

A full copy of the Code of Conduct is provided to all new employees for signature during onboarding or induction. The Code of Conduct is also covered in the Employee Handbook and is available on various intranet and extranet sites, with paper copies available in the Human Resources department.

- **Reporting Concerns:** Employees are encouraged and asked to report genuine concerns that they may have over possible violations of 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. We will keep such concerns confidential to the extent permitted by law.
- **Recruitment Policy:** We have a Recruitment Policy that outlines the processes to follow when recruiting, including conducting Right to Work checks to establish prospective employees' eligibility to work in the UK and Ireland. The updated Recruitment policy will be in place in early 2026.
- **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. In 2026, the policy will be reviewed and updated to reflect additional obligations arising from the Employment Rights Act 2025.
- **Diversity, Equity and Inclusion policy:** our Diversity, Equity and Inclusion policy outlines 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:** The Sexual Harassment policy outlines our expectations in this area, along with reporting methods. In 2026, the policy will be reviewed and updated to reflect additional obligations arising from the Employment Rights Act 2025.

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, 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 seeks to engage must 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; audits were conducted and will continue to be conducted at regular intervals.
- We strengthened controls over temporary staffing providers and complete due-diligence checks. In 2026, we will expand our audit programme to review the labour practices of temporary staff suppliers and continue to reduce reliance on third-party labour through enhanced direct recruitment initiatives.

- 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 (or for any other participant in the supply chain) to have a direct relationship with all 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 address 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/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, and annual refresher training to maintain 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".
- To ensure all hiring managers are adept at checking eligibility to work in the UK and Ireland, we review/update right-to-work training modules in line with respective government/statutory guidance at least every six months.
- We completed work on and launched the 'Select the Best' training for hiring managers, ensuring quality and compliant hiring practises.
- Throughout 2025, we maintained team member awareness of our Diversity, Equity and Inclusion (DEI) policy through the Be Leonardo training module and regular topical posts to a dedicated stream on the internal communication platform – LEAPP. These highlighted the responsibility of all employees to treat everyone equally and with fairness, dignity, and respect, and to prevent 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 are 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 2025, 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 have been found to be implementing best-practice initiatives across all areas of Modern Slavery compliance, in line with their commitment to our Agency Compliance agreement.

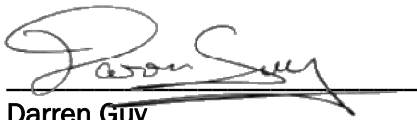
Audits of our main overseas outsourcing companies have been conducted by our employees, outsourcing company employees, and third-party auditors. Each third-party site in Albania and Cebu was audited twice by our employees during site visits.

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's 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 has duly authorised the below-named signatory to sign it on their behalf.

For and on behalf of Leonardo Hotels UK and Ireland,



Darren Guy

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

Dated: February 16th, 2026