

MODERN SLAVERY STATEMENT

Financial Year Ending 31 December 2025

Published by Accor HotelServices UK Limited pursuant to section 54(1) of the Modern Slavery Act 2015

1. Introduction

This statement is made on behalf of Accor HotelServices UK Limited a UK based subsidiary of Accor SA (together, "**Accor**" or the "**Group**") pursuant to section 54(1) of the Modern Slavery Act 2015 (the "**Act**"). Accor is a world-leading hospitality group, operating in more than 110 countries with over 5,800 hotels and a portfolio of over 45 brands ranging from luxury to economy. Accor is committed to conducting business in a manner that respects human rights in its operations and supply chains, and to taking steps to identify, prevent, and address the risks of modern slavery and human trafficking.

Accor's human rights approach is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Accor has joined several initiatives to discuss human rights impacts in the sector, including the UN Global Compact.

This is Accor's statement under the Act for the financial year ending 31 December 2025.

2. Organisation, Structure, Business and Supply Chains

2.1 Business Model

Accor is a hospitality group operating in more than 110 countries, with a portfolio of over 5,800 hotels and over 45 brands. The business model is predominantly asset-light: the majority of the network operates under management and franchise contracts, with a limited number of owned or leased properties.

Under management contracts, Accor manages hotel operations on behalf of property owners. Under franchise contracts, Accor licenses its brands and operating standards to independent owners and operators. This structure means that the majority of employees working under the Accor brand worldwide are not directly employed by Group companies.

It is important to note that franchised properties make independent decisions regarding hotel operations, including procurement and employment. This distinction shapes the nature and extent of Accor's ability to identify and address modern slavery risks across Perimeter C, as described throughout this Statement. Accor seeks to exert influence through brand standards, contractual requirements, and shared tools and training, recognising that indirect leverage is the primary mechanism available in respect of franchised operations.

2.2 Reporting Perimeters

For the purposes of this Statement, Accor operations and supply chain are described across three reporting perimeters, consistent with the approach adopted in Accor's Universal Registration Document 2025 ("**URD 2025**"):

- **Perimeter A** — Accor's own corporate functions and directly operated (owned or leased) hotel sites;

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- **Perimeter B** — Hotels operated under management contracts, where Accor manages day-to-day operations on behalf of property owners;
- **Perimeter C** — Hotels operated under franchise agreements, where Accor licenses its brand and standards to independent franchisees.

The scope of due diligence activity, and the nature of Accor's ability to influence labour standards, varies across these three perimeters as described throughout this Statement.

2.3 UK Operations

In the United Kingdom, Accor operates a portfolio of hotels across multiple brands. The UK operations include both managed and franchised properties. Accor HotelServices UK Limited is covered by this Statement.

2.4 Supply Chains

Accor's supply chain is managed through a nominated supplier programme covering approximately 4,500 suppliers, representing around 50% of total purchasing volume, monitored by Accor's Group Procurement function. These nominated suppliers are subject to Accor's Responsible Procurement Charter and associated due diligence requirements. The remainder of procurement occurs at hotel level, including by franchised hotels acting independently. Since 2023, Accor has rolled out a Hotel Purchasing Guide across all Accor-branded establishments to better support them, from a due diligence perspective, in relation to their non-contracted purchases.

The approximately 100 procurement categories have been mapped to identify their level of risk in relation to environmental, social, and ethical issues. Based on this risk mapping, conducted by a third party, a control plan for nominated suppliers was established and implemented.

Key categories of supply chain risk identified include housekeeping, food and beverage, construction and renovation, laundry and textile services, and temporary or agency labour — all sectors where the risk of labour exploitation, including forced labour, is recognised as elevated.

In addition to our nominated supplier program, Accor acknowledges that it has limited visibility into purchasing decisions made independently by hotel owners and franchisees where Group procurement programmes are not used, including supply chains involved in the development and construction of new hotels. Addressing this visibility gap is an ongoing area of focus for the Group, as described in Section 4 below.

3. Policies in Relation to Slavery and Human Trafficking

Accor maintains a suite of policies relevant to modern slavery, human trafficking, and the protection of human rights across its operations and supply chains. The principal policies are set out below.

3.1 Human Rights Policy

Accor published its Human Rights Policy in 2023. This policy is being progressively deployed across the Group and constitutes the foundation of Accor's commitment to preventing forced labour and protecting vulnerable populations, including migrant workers and children.

The Human Rights Policy references international human rights standards, including the International Bill of Human Rights and the core conventions of the International Labour Organization (ILO). Its commitments include:

- freedom of association and the right to collective bargaining;

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- the rejection of child labour;
- the rejection of forced labour in all its forms;
- the prevention of human trafficking and child sexual exploitation;
- anti-harassment and non-discrimination;
- health and safety;
- privacy.

3.2 Minimum Labour Standards

Accor's minimum standards in relation to child labour provide that the minimum working age is consistent with the end of compulsory schooling and at least 15 years of age. No hazardous work is permitted for individuals under 18 years of age, consistent with ILO Convention No. 182.

Accor rejects all forms of forced labor and undertakes to respect the rights of vulnerable populations, in particular the rights of migrant workers and strive to apply specific protections including: ethical recruitment conditions, freedom of movement; the non-retention of identity documents; and full transparency of contractual terms in a language understood by the worker.

3.3 Ethics & CSR Charter

Accor's Ethics & CSR Charter applies across all Group entities and sets minimum standards of conduct in relation to labour rights, anti-corruption, environmental responsibility, and business integrity. References to the Ethics & CSR Charter are systematically included in all new franchise contracts.

3.4 Responsible Procurement Charter

All nominated suppliers are required to commit contractually to Accor's Responsible Procurement Charter as a condition of appointment. This Charter sets out Accor's expectations in relation to labour rights, human rights, environmental standards, and anti-corruption.

Accor's human rights standards and responsible procurement commitments are shared with owners and suppliers as part of legal compliance due diligence processes, and are incorporated as contractual requirements in new supplier agreements.

3.5 UK-Specific Policies and Commitments

In the United Kingdom, Accor's HR policies include right-to-work verification procedures for all new employees, consistent with the requirements of the Immigration, Asylum and Nationality Act 2006. Payrolled employees (full time, part time, fixed term contracts and internships) will also have a contract of employment. Examples of policies included as part of the onboarding process are, Conflict of Interest, Corporate Social Responsibility Charter, Company Handbook etc. Agency workers engaged through third-party labour providers are subject to parity of treatment requirements under the Agency Workers Regulations 2010, and all labour providers used by UK operations are required to hold a valid Gangmasters and Labour Abuse Authority (GLAA) licence where applicable.

4. Due Diligence Processes

Accor has a compliance team led Third Party Due Diligence (TPDD) process. This screens for HR-relevant content, including any negative media against third parties Accor associate with as well as individuals involved with the management/ownership of those third parties.

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4.1 Supplier Due Diligence

Accor operates a three-tier responsible procurement approach. All nominated suppliers are required to commit contractually to the Responsible Procurement Charter and are subject to a structured risk analysis and assessment process, calibrated to the level of ESG risk identified.

Source to contract process: A supplier selection and nominating process is applied by all Accor procurement teams in order to monitor and assess the social, ethical and environmental compliance of suppliers consulted during tenders. Sustainability-related criteria can represent up to 30% of the weighting in supplier comparison and evaluation processes.

Contractual obligations: After supplier selection, the supplier is contractually required to comply with the Responsible Procurement Charter and sustainability clauses.

ESG Risk Mapping: This control plan is based on a mapping of supplier risks in environmental, societal and ethical matters. This mapping, carried out by an external consulting firm, assesses purchase categories across 16 risks divided into five categories (environment, human rights, working conditions, health and safety, and ethics) and resulted in the classification of 104 purchase categories into three risk levels: "low risk", "high risk" and "very high risk".

Supplier assessment and on-site audit: A monitoring and control plan is implemented throughout the lifecycle of the nominating contracts to ensure supplier compliance over the duration of the contractual relationship.

This plan includes several levels of control, including:

- The evaluation of nominated suppliers identified as "high" or "very high" risk, based on the assessment carried out by a third party (EcoVadis), which relies on a questionnaire specific to the size and sector of activity of the suppliers.
- The audit of nominated suppliers identified as "very high risk", which can, under certain performance criteria, be subject to an on-site audit by a third party. Depending on the outcomes of the audit, a corrective action plan is requested from the supplier and is monitored. Denomination can be decided in case of persistent non-compliance.

For non-nominated suppliers, hotels should rely on the Hotel Purchasing Guide, which sets out the responsibility of hotels in complying with local regulations and international standards, including with regards to forced labour and child labour.

Supplier Assessment and Screening: All medium- and high-risk nominated suppliers are required to complete an EcoVadis sustainability assessment (or equivalent). As at the end of 2025, 98% of suppliers classified as medium- or high-risk had responded to the EcoVadis questionnaire or equivalent, covering 99% of the related procurement volume.

In addition to EcoVadis assessments, Accor's due diligence for higher-risk suppliers includes the use of additional screening and due diligence tools, contractual audit rights, and ongoing monitoring — including on-site audits for certain high-risk, high-spend commodity categories such as labour services, textiles, and food supply chains.

Corrective Action: Where ESG concerns are identified through the assessment process, corrective action plans are agreed with the supplier. Suppliers who fail to remediate identified concerns within agreed timeframes are removed from Accor's approved supplier list.

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Supplier Improvement: Between 2022 and 2025, Accor supported over 2,000 suppliers in improving their sustainability performance, with an average EcoVadis score improvement of 17 points over that period. Accor is a co-founder of the Hospitality Alliance for Responsible Procurement (HARP), powered by EcoVadis, which brings together hospitality industry peers to improve supplier sustainability performance, including on human rights and labour standards.

4.3 Development and New Market Due Diligence

Accor integrates human rights checks on potential new hotel owners. Risk-based country-level mitigation plans are maintained and implemented through brand standards for new managed and franchised hotels. Accor is also in the process of introducing new HR-specific questioning into the new form of external diligence questionnaire that is issued to counterparties falling into the Group 3 risk category.

4.4 Due Diligence in Managed Hotels (Perimeter B)

In hotels operating under management contracts, Accor oversees the hotel-employed workforce and is therefore able to apply its labour standards, HR policies, and due diligence processes directly.

4.5 Due Diligence in Franchised Hotels (Perimeter C)

Franchised hotels form part of Accor's value chain for the purposes of its sustainability reporting (consistent with ESRS S2 — Workers in the Value Chain). Although Accor does not exercise direct operational or financial control over franchisees, it seeks to influence labour standards through a range of mechanisms. These include:

- Embedding references to the Ethics & CSR Charter in all new franchise contracts;
- Owner Responsible Business Standards, which set minimum expectations in relation to labour rights, anti-corruption, and environmental performance;
- Sharing Accor's values, tools, and training resources — including the WATCH programme and modern slavery awareness materials — with franchised hotel teams.

Where allegations of modern slavery or labour rights violations arise in relation to franchised hotels, Accor communicates allegations to franchise owners with reminders of their contractual obligations, brand standards requirements, and applicable legal obligations.

4.6 Grievance and Alert Mechanisms

Accor operates a confidential ethics alert mechanism (Accor Integrity Line) to all employees of the organisation about modern slavery, forced labour, labour rights violations, or other ethical breaches to be reported confidentially. The alert mechanism is accessible via a dedicated online platform and is available in multiple languages. Alerts related to human rights are investigated by Accor People & Culture function, and appropriate follow-up action is taken.

The alert mechanism is available not only to hotel employees and Accor Group employees, but also to suppliers, business partners and the wider community.

For managed hotels, suspected modern slavery situations are escalated for assessment and response. Trends identified through the alert system inform the development and prioritisation of training and awareness activities.

5. Risk Assessment and Management

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5.1 Risk Assessment Methodology

Accor's human rights risk mapping uses a severity/probability scoring methodology, consistent with the framework set out in the UN Guiding Principles on Business and Human Rights (UNGPs). A higher weighting is applied to the severity dimension, reflecting the UNGPs' prioritisation of the most serious potential impacts on people over the likelihood of their occurrence.

The assessment also evaluates the degree of existing mitigation in place for each identified risk, in order to determine residual risk levels and to prioritise remediation and action. Accor's human rights risk mapping was first conducted in 2022 and was most recently updated in 2024, with the support of a specialised external firm.

To support the geographic dimension of risk assessment, Accor maps its hotel portfolio against external human rights risk indices to identify hotels in higher modern slavery risk regions, enabling targeted application of additional due diligence measures in those locations. This geographic risk scoring is used to calibrate the deployment of training and monitoring across the network.

5.2 Salient Modern Slavery Risks

Accor has identified that among the workers in the value chain, some groups may potentially find themselves in a situation of vulnerability. These groups include:

- migrant workers who may find themselves in a situation of economic and/or administrative dependence on their employer;
- seasonal workers often employed during periods of high tourist activity;
- women; and
- low-skilled workers or workers without professional training.

Risk assessment and mitigation measures are calibrated accordingly, with particular attention to roles and geographies where these populations are disproportionately represented.

6. Key Performance Indicators

The following key performance indicators track Accor's progress in addressing modern slavery and human rights risks across its operations and supply chains for the financial year ending 31 December 2025.

KPI	2025 Performance
Medium/high-risk nominated suppliers completing EcoVadis (or equivalent)	98% (covering 99% of related procurement volume)
Suppliers supported in improving sustainability performance (2022–2025)	2,000+
Average EcoVadis score improvement (2022–2025)	+18 points

7. Training and Capacity Building

7.1 Human Rights e-learning

Accor offers several communication and awareness-raising initiatives around human rights for workers in the value chain, in order to raise employees awareness on human rights issues. Among other tools,

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Accor has developed a Human Rights Toolkit that clarifies the commitments of the Group's Human Rights Policy and helps to identify and mitigate human rights risks. In particular, it sets out the warning signs relating to employment conditions that may lead to forced labor. It gives concrete recommendations to mitigate these risks, in particular the careful selection of service providers working in hotels. In 2025, the Group launched the responsible recruitment and employment principles aiming at preventing forced labor by promoting responsible employment practices.

7.2 WATCH — We Act Together for Children

Accor's WATCH (We Act Together for CHildren) programme is deployed across the hotel network to help hotel employees and guests detect and respond to risks of sexual exploitation of children. Dedicated training tools and awareness materials are available in multiple languages. WATCH training is made available to hotel staff in both managed and franchised properties, and Accor works with specialist Non Governmental Organisation and industry partners to keep the programme current and effective.

8. Industry Collaboration and Partnerships

Accor recognises that modern slavery is a systemic challenge that requires collective action. In addition to its internal programmes, Accor engages in the following external partnerships and industry initiatives relevant to modern slavery and human rights:

- **The Code/ECPAT:** Accor is a signatory of "The Code" (the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism) and formed a partnership with ECPAT, an NGO working to end the trafficking and sexual exploitation of children in all its forms.
- **It's a Penalty:** Accor carried out an awareness-raising campaign in collaboration with the NGO It's a Penalty during the UEFA Women's Euro 2025 in Switzerland to combat human trafficking. This initiative aimed to raise awareness of the various forms of exploitation linked to human trafficking during mega-sporting events.
- **EDH (Entreprises pour les Droits de l'Homme):** Accor joined EDH in 2025, a forum fostering exchanges and initiatives among international companies for the better integration of human rights in the policies and practices of companies through the implementation of vigilance procedures.
- **Unseen UK (UK operations):** Partnership providing access to the Modern Slavery Helpline and supporting employee awareness in Accor's UK hotel portfolio.
- **Hospitality Alliance for Responsible Procurement (HARP):** Accor is a co-founder of HARP, powered by EcoVadis, bringing together hospitality industry peers to drive improvements in supplier sustainability performance, including on human rights and labour standards.
- **World Sustainable Hospitality Alliance:** Accor participates in a working group on human rights to exchange with its peers on these challenges and is working towards finding common solutions to address the human rights risks, and in particular forced labour, in the hospitality sector.

9. Governance and Board Approval

9.1 Board-Level Oversight

The Board of Directors of Accor SA is supported by five specialised committees. Modern slavery, human rights, and supply chain responsibility sit within the remit of the following committees. Please refer to page 89 of the URD 2025.

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ESG Committee

The ESG Committee reviews Accor's sustainability strategy, performance indicators, and the Group's double materiality analysis. The ESG Committee, jointly with the Audit, Compliance & Risks Committee, reviews the Group's Sustainability Report.

Audit, Compliance & Risks Committee

The Audit, Compliance & Risks Committee oversees sustainability reporting, risk mapping, and internal audit plans, including operational audits that evaluate compliance with Group standards and verify hotel internal-control self-assessments. Internal audit due diligence reviews verify compliance with anti-corruption and human rights principles under the Ethics & CSR Charter and the Human Rights Policy.

Appointment and Compensation Committee

The Appointment and Compensation Committee reviews compensation of corporate officers as well as reviewing diversity policy.

9.2 Cross-Functional Approach

The fight against forced labor is a priority of the human rights approach at Accor. It involves a cross-functional approach involving the various functions and business lines, which integrates human rights considerations into the Group's relevant policies and processes. The Social Care & Impact Department steers this approach and relies on the various functions, including Legal, Human Resources, Safety & Security, and Procurement, and operations involved as well as their networks in the brands and regions to deploy this approach. Responsible sourcing governance is overseen by Group Procurement leadership, with guidance from sustainability and legal leadership. This cross-functional structure ensures that modern slavery risk is addressed holistically across the business.

9.3 Duty of Vigilance

Accor publishes an annual Vigilance Plan pursuant to the French Duty of Vigilance Law (Loi relative au devoir de vigilance des sociétés mères et des entreprises donneuses d'ordre, Law No. 2017-399). The Vigilance Plan sets out Accor's risk mapping, due diligence measures, alert mechanisms, and monitoring procedures in relation to human rights and fundamental freedom, individual health & safety and environmental risks across its operations and supply chains, and is incorporated by reference into this Statement.

9.4 CSRD and ESRS Reporting

For the financial year ending 31 December 2025, Accor is reporting in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). Accor's double materiality analysis, sustainability disclosures, and ESRS S2 (Workers in the Value Chain) disclosures — including on forced labour risks — are set out in the URD 2025, which is published on Accor's website and incorporated by reference into this Statement.

10. Continuous Improvement

Accor's ongoing priorities for strengthening its approach to modern slavery and human trafficking include: strengthening risk and impact assessment methodologies; further strengthening due diligence of suppliers and working on ethical recruitment practices; continuing to update and improve training and awareness programmes; collaborating with industry peers; and evaluating and developing partnerships with civil society organisations.

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11. Approval

This Statement has been approved by the Board of Directors of Accor HotelServices UK Limited and is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2025.

Accor HotelServices UK Limited

Date: 23 June 2026

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