

# easyHotel Group

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Anti-slavery and human trafficking statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015. This is easyHotel's third statement and it constitutes easyHotel's anti-slavery and human trafficking statement for the financial year ending 31 December 2025.

## **Introduction**

At easyHotel we are committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chains, and we impose the same high standards on our suppliers. We are also committed to ensuring that there is transparency in our business and in our approach to preventing modern slavery in our supply chains. Since publishing our first anti-slavery statement, we have made good progress on the objectives (detailed below).

## **Our business structure and supply chains**

easyHotel is an international hospitality company which owns, operates, develops and franchises great value hotels under the 'easyHotel' brand. We are present in over 30 cities and have an estate of owned, leased, and franchised hotels.

In order to provide affordable accommodation in an ecologically responsible manner, we work with a range of suppliers who broadly fall into two categories: hotel suppliers and support suppliers. Our hotel suppliers provide all goods and services used in the operation of the hotels and our support suppliers provide all ancillary services and goods required by our support office team. Procurement of suppliers is managed by internal stakeholders within our support office team, and they choose our suppliers carefully in accordance with the below-mentioned policies.

## **Policies and processes**

As part of our commitment to combating modern slavery, in 2023, we implemented an anti-slavery policy and amended our supplier management policy. Following a review of our current processes, we introduced a supplier code of conduct and amended the supplier management policy to reflect this change.

In accordance with our supplier management policy, we share our supplier code of conduct with our suppliers and ask them to adhere to the same high standards, where necessary.

We continue to implement right-to-work checks on all new employees in accordance with our recruitment and selection policy. Our whistleblowing policy also supports with the prevention of modern slavery.

## Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we implemented internal audits for our suppliers and franchisees. Our suppliers and franchisees are aware of our zero-tolerance approach to slavery and human trafficking.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistleblowers.

## Risk and compliance

easyHotel periodically evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chains. We consider easyhotel to have a moderate risk because we operate in a labour-intensive industry. Where we identify a potential risk, we will investigate such risk and take appropriate action. We ensure all high-risk suppliers adhere to our supplier code of conduct. We do not tolerate slavery and human trafficking within our supply chains. *If we find evidence of a failure to comply with our supplier code of conduct or any relevant law, we have provisions in our contracts that allow us to terminate the contract.*

## Objectives and Progress

We do not have specific KPI reporting. However, following a review of our actions since publishing our first anti-slavery policy, we have the following objectives, action steps and progress to date:

Objective	Action Steps	Progress to date
Continue to ensure all new and existing suppliers are aware of easyHotel's zero tolerance	Send all new suppliers a copy of our supplier code of conduct, before we enter into any contract.	Our Supplier code of conduct is a short document that sets out how easyHotel expects

Objective	Action Steps	Progress to date
<p>approach to modern slavery.</p>	<p>Send all existing suppliers a copy of the same.</p> <p>Suppliers that are considered high risk will be asked to confirm adherence with the code of conduct.</p>	<p>suppliers to behave in the marketplace and handle various legal and ethical matters. We continue to provide the code of conduct to all new suppliers and ask that it be adhered to in our contract clauses.</p> <p>Third-party supplier questionnaires, covering Modern Slavery, are regularly reviewed by easyHotel's legal team to ensure they are satisfactory.</p>
<p>Ensure that our supplier management practices, and modern slavery policy are adequately addressing the modern slavery risks we face.</p>	<p>Undertake an annual review of our modern slavery policy and procedures to ensure they remain fit-for-purpose for identifying, mitigating and remediating identified and potential risks of modern slavery in our supply chains.</p>	<p>The Legal team reviewed our modern slavery policy and procedures, and confirmed they remain fit-for-purpose. This continues to be the case for the current period.</p>
<p>Ensure we have contractual recourse under standard supply contracts if modern slavery issues are subsequently identified.</p>	<p>Incorporate our standard anti-slavery contractual wording in all new high-risk contracts.</p> <p>Where an agreement, with a supplier operating in a high-risk sector or</p>	<p>All new high-risk contracts signed after 31 Dec 2022 include our standard anti-slavery contractual wording.</p> <p>We are in the process of reviewing and updating</p>

Objective	Action Steps	Progress to date
	location, does not provide adequate recourse where modern slavery issues are identified, amend standard supply contract wording by 31 December 2025 to include warranties on modern slavery compliance, termination rights for non-compliance and audit rights.	some legacy contracts with suppliers to ensure the easyHotel modern slavery clauses and a termination right are included. Whilst most contracts have modern slavery clauses incorporated, we should have all legacy contracts updated by end of 2026.
Ensure that all staff are aware of the risks associated with modern slavery that we face as a Group, and ensure those in relevant roles review the modern slavery risk management strategy at least annually.	Ensure all employees in the easyHotel Group undertake modern slavery awareness training at least annually.	All employees are mandated to complete modern slavery awareness training every year via our training platform, Flow, which is accessible to all employees across the easyHotel Group.
	Complete an annual internal review of our modern slavery risk management strategy and supplier management practices with operations, front-line procurement and other relevant staff.	This review was completed by the Legal team, Franchise Manager, Operations Project Manager and other relevant easyHotel personnel.

## Training and awareness

We have invested and continue to invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains.

Through our training, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy, and report any concerns they may have about guests, colleagues, someone in our supply chains or someone unrelated to easyHotel. Anti-slavery training is mandatory and completed on an annual basis. In team areas at our hotels, we display posters that detail key signs that could indicate that someone may be a slavery or trafficking victim and how an employee should report a suspicion.

## **Our on-going commitment**

As a responsible business, we recognise the importance of continual improvement and developing our approach to combating modern slavery and human trafficking. We will review our approach and objectives at least annually.

Approved by the Board of Directors of easyHotel Limited on 17 June 2026.

**Charles Persello**

Chief Executive Officer