



Essendi UK
Modern Slavery Statement 2026

MODERN SLAVERY STATEMENT 2026

Introduction

This statement sets out Essendi UK's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and supply chains.

This statement relates to actions and activities during the financial year 1 January 2025 to 31 December 2025.

This statement is made on behalf of AIHI UK Limited (a company incorporated in England and Wales with company number 10529493) and its subsidiaries (together, “**Essendi UK**”), including without limitation Essendi UK Hotels 1 Limited (a company incorporated in England and Wales with company number 01016187), Essendi UK Hotels 2 Limited (a company incorporated in England and Wales with company number 01244907), AI London Waterloo Limited (a company incorporated in England and Wales with company number 14980059), AI London Heathrow Limited (a company incorporated in England and Wales with company number 14980029) and AI Birmingham Airport Limited (a company incorporated in England and Wales with company number 14980053). Essendi UK is the UK arm of the group of companies ultimately owned by Essendi Group S.A. (a company incorporated in Luxembourg with registration number B100771) (together, the “**Essendi Group**”).

As part of the hospitality industry, Essendi Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Essendi Group recognises that the risks of modern slavery include the risks that arise from the use of foreign and migrant labour, and from within supply chains in the UK and overseas.

Essendi UK is fully committed to preventing slavery and human trafficking in its activities and to ensuring that its supply chains are free from slavery and human trafficking.

1. Organisational Structure

The Essendi Group is a hotel owner, investor and operator. Essendi Group has a longstanding relationship with Accor and all Essendi Group’s hotels trade under Accor’s international brands.

Globally, Essendi Group has a property interest in 535 hotels across 21 countries mainly in Europe but also in Latin America and Asia. To provide guests with the very best experience, Essendi Group mobilises an international team made up of around 21,569 employees working at its support offices and hotels. Essendi Group’s hotel portfolio has changed during the reporting period as a result of disposals or other operational changes, but the figures included in this statement are accurate as of 31 December 2025.

Essendi UK has a property interest in 61 hotels and has approximately 1965 employees. Essendi Group’s portfolio comprises Accor brands including Ibis Budget, Ibis, Ibis Styles, Mercure, Novotel and Pullman.

ibis Birmingham Airport	ibis Leeds West	ibis Styles London Southwark Rose
ibis Brighton City Centre	ibis Liverpool Albert Dock	ibis Aberdeen
ibis Bristol Centre	ibis London Blackfriars	Mercure London Bankside
ibis Bristol Temple Meads Quay	ibis London Canning Town	Novotel Birmingham Airport
ibis Budget Birmingham Airport	ibis London City	Novotel Bristol Centre
ibis Budget Birmingham Centre	ibis London Elstree Borehamwood	Novotel Cambridge
ibis Budget Edinburgh Business Park	ibis London Excel	

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ibis Budget Glasgow	ibis London Greenwich	Novotel Cardiff Centre
ibis Budget Leeds	ibis London Heathrow Airport	Novotel Edinburgh Centre
ibis Budget London Barking East	ibis London Shepherds Bush	Novotel Liverpool
ibis Budget London Hounslow	ibis London Stratford	Novotel London Blackfriars
ibis Budget London Whitechapel	ibis London Thurrock M25	Novotel London Brentford
ibis Budget Manchester Centre	ibis London Wembley	Novotel London Bridge
ibis Budget Manchester West	ibis Manchester Centre Princess Street	Novotel London Canary Wharf
ibis Budget Portsmouth	ibis Northampton Centre	Novotel London Excel
ibis Budget Sheffield Arena	ibis Nottingham Centre	Novotel London Paddington
ibis Budget Southampton Centre	ibis Portsmouth Centre	Novotel London Waterloo
ibis Cambridge Station	ibis Reading Centre	Novotel Milton Keynes
ibis Carlisle	ibis Styles Liverpool Dale Street	Novotel Reading Centre
ibis Edinburgh Centre South Bridge	ibis Styles London Ealing	Novotel York
ibis Hull		Pullman London St Pancras

Essendi UK is committed to being a responsible company that adheres to ethical principles, complies with applicable laws and regulations, and honours the commitments to its various stakeholders, including every worker supplying goods or services to Essendi UK, every team member supporting guest services, and every guest served by the business every day.

This commitment extends to human rights including modern slavery and human trafficking.

Essendi Group's commitments are formalised in its Ethics Charter and its annexures, including its Social Charter, and supported by mandatory e-learning for support office staff and, with effect from the end of 2026, hotel General Managers.

2. Supply Chains

Essendi UK's supply chain consists of suppliers who provide goods and services to its hotels and support office.

A substantial majority of Essendi UK's hotels' suppliers are carefully selected by Accor's Global Procurement Office, pursuant to the hotel management agreements that apply to Essendi UK's hotels. The terms and conditions applicable to these referenced suppliers are negotiated by Accor, in its capacity as Essendi UK's hotel management company.

For non-referenced suppliers, contracts are negotiated at hotel or support office level. In accordance with Essendi UK's internal authorisation rules, these contracts are validated by the support office where required to reduce the risk of non-compliance.

3. Assessing Risks

Essendi Group has a cross-functional working group (composed of risk management, HR, CSR, and Legal departments) to identify and assess the risks applicable to the business. Essendi Group has an Ethics Charter, applicable in its hotels and support offices, which sets out a strong ethical culture in both its strategy and its daily activities, covering topics such as respect for employees, human trafficking and labour exploitation.

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Essendi Group works in coordination with Accor to make sure that its hotels comply with Accor's Sustainability and Risk Programme and with the principles, standards and commitments included in Accor's Ethics and CSR Charter and Compliance Programme.

Essendi UK recognises that modern slavery risks may arise in different areas of its business and supply chains, including supplier relationships, labour-related services, hotel operations and guest safeguarding risks. These areas are managed through procurement controls, HR processes, right to work checks, supplier due diligence, training and governance oversight.

4. Key Risks and Due Diligence Processes

4.1. Supply Chain Risk Mapping:

In 2026, Accor's Global Procurement Office, which negotiates the majority of the Essendi Group hotels' supplier contracts, has implemented a new risk mapping with a finer granularity at the supplier level and based on environmental, social and ethics impacts. Moving beyond mapping based solely on procurement categories, risks are now mapped at the individual supplier level.

Driven by a dynamic digital tool with annual updates, this new approach assesses suppliers based on multiple criteria, including:

- Analyses of public documents (policies, charters, codes of conduct, etc.);
- Geographical location and country risks;
- Procurement category risk;
- Overall supplier performance, and other relevant indicators.

This risk mapping has classified the referenced procurement categories into 3 risk levels:

- Risk level 1 (low risk);
- Risk level 2 (moderate risk);
- Risk level 3 (high risk).

4.2. Referenced Supplier Control Plan:

Moving away from the previous 3-year cycle, Accor has implemented a new supplier control plan to reinforce expectations and ensure permanent, continuous supply chain compliance.

This updated plan includes several strengthened levels of control:

4.2.1. Commitments from Referenced Suppliers

Commitments from all referenced suppliers formalised by:

- The signature of the Responsible Procurement Charter: Updated to reflect the latest regulations and Accor's heightened requirements, this charter spells out the mandatory commitments expected from referenced suppliers regarding ethics, human rights, workers' rights, environmental protection, and legal compliance. This charter remains a binding contractual obligation appended to all contracts.

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- The signature of contractual clauses: Standard clauses in referencing contracts cover specific environmental and social obligations, compelling suppliers to undergo evaluations or audits at Accor's request.

4.2.2. Evaluation of Referenced Suppliers

The evaluation process has been modernised to provide greater accuracy and adaptation to local contexts:

- Based on the new Risk Mapping, all suppliers identified as risk level 2 or 3 with an annual spend below €30,000 are targeted by the evaluation process.
- The assessment framework has been reinforced by a mandatory corrective action plan for any major non-conformities identified during the EcoVadis evaluation.

This environmental, social and ethical assessment is carried out by a third party (EcoVadis) on the basis of a questionnaire tailored to the size and business sector of the supplier. The CSR performance of referenced suppliers is measured according to the quality of their answers to the questionnaire and the examination of the supporting documents they provide.

4.2.3. Audit of Referenced Suppliers

For suppliers classified as high-risk, the audit mechanism has been significantly strengthened:

- On-site audits are triggered at a higher minimum threshold of 50/100 on the EcoVadis score (increased from the previous score of 43).
- This framework covers five core criteria: labor law, working conditions, health and safety, ethics, and the environment.

Post-audit monitoring has been reinforced with a highly structured corrective action plan follow-up to guarantee that non-compliance issues are resolved systematically and transparently.

4.2.4. Vigilance Plan

For each of the three risk categories, a vigilance plan defines the controls and review points to be applied throughout the procurement process, including tender, supplier selection, contract award, evaluation, audit, corrective action planning and, where appropriate, dereferencing.

4.3. Contractual Commitments of Referenced Suppliers

All referenced suppliers contractually commit to:

- Comply with the terms of Accor's responsible procurement charter;
- Make sure that its own suppliers and sub-contractors comply with the same principles;
- Participate in Accor's assessment and implement the subsequent policy;
- Authorise Accor and/or any third party appointed by Accor to perform audits and implement the subsequent recommendations.

4.4. Coordination with Accor

Essendi UK works in coordination with Accor to obtain and review Accor's supplier risk mapping, assessments, reports and related measures in respect of referenced suppliers.

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4.5. Essendi Group Purchasing Policy

Essendi Group has its own Purchasing Policy in respect of supplies to its support offices, which sets out its commitments in terms of social and environmental responsibility in the context of its purchases.

4.6. Essendi Group KYC Procedure

Essendi Group has its own, separate, KYC procedure, which has been updated in 2026.

At hotel-level, this includes contracts with non-referenced suppliers with whom Essendi Group spends ≥ €200,000 of revenue per annum and contracts with construction, repair, technical or maintenance suppliers with whom Essendi Group spends ≥ €150,000 of revenue per annum.

At support office level, this includes landlords and (sub)tenants, third parties from whom Essendi Group purchases an asset or to whom it sells an asset, corporate banks, lawyers who receive revenue of ≥ €150,000 per annum, and intermediaries.

The screening checks on affected third parties are renewed every six months during the relationship for ongoing monitoring.

4.7. Team Members**4.7.1. Employer Responsibilities**

Essendi UK exercises its responsibilities as an employer in its hotels, managed by Accor, and its support office. Essendi UK respects Accor's recommendations for the management principles and talent development policies in its hotels.

All employee relations responsibilities remain with Essendi UK as the employer.

4.7.2. Employee Rights and Working Environment

All employees deserve basic human and employment rights, including the right to be treated with dignity and respect and to be provided a safe and healthy work environment. In addition to formal guidance, a culture that supports the well-being and inclusion of all employees and encourages a positive working environment is key.

4.7.3. Recruitment Practices

Essendi UK employees are recruited via public job boards (AccorCareer, LinkedIn) or via respected recruitment agencies. No employees are requested to pay any recruitment fees or related costs.

Essendi UK continues to monitor employment practices to support compliance with employment rights and to reduce the risk of labour exploitation within its own workforce.

4.7.4. Employment Safeguards

Every employee has a contract of employment. No employee is forced to work. No employee is requested to hand over their passport, work permit or bank cards (other than to confirm their identity and that they are paid directly into their personal bank account). Essendi UK pays all employees more than the UK Government's National Living Wage.

4.7.5. Workforce Policies and Reporting Channels

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The following policies are embedded throughout Essendi UK and support the mitigation of any risk that a team member may be subjected to modern slavery.

- **Right to Work:** Essendi UK conducts rigorous checks on all of its workers, including checks on foreign and migrant workers' eligibility to work in the UK. Checks are carried out on all team members to ensure the documents they provide are genuine and fit for purpose, in line with applicable laws. Essendi UK ensures that managers are provided with the tools and skills to carry out the necessary document checks considerably and appropriately.
- **Staff Handbook:** This document outlines Essendi UK's code of conduct and is provided to all employees upon joining. The organisation's codes make clear to employees the actions and behaviour expected of them when representing the organisation. Essendi UK strives to maintain the highest standards of employee conduct and ethical behaviour.
- **Fighting Against Sexual Harassment Policy:** Essendi Group is party to an international agreement with the International Union IUF. This framework agreement aims to strengthen the fight against sexual harassment and sets out the main principles and actions for which Essendi Group is committed. This agreement reflects Essendi Group's commitment to two key areas: prevention and zero tolerance of all forms of harassment. A mandatory harassment prevention policy is in place across the Group and are regularly reviewed and updated to reflect evolving legislation, regulatory guidance and recognised good practice. The Group provides its employees with training modules to prevent and, if necessary, stop sexual harassment.
- **Promote Employee Health and Safety:** In May 2026, Essendi UK and the IUF signed a joint declaration concerning occupational safety and health. Essentially, after reaffirming the group's commitment to international standards, this document emphasises the importance of training employees on procedures, work methods, equipment use, and safety issues to prevent health risks. This objective is complemented by a commitment to well-being, which involves developing initiatives and work methods that improve well-being in the workplace, as well as preventive measures to eliminate excessive physical or mental fatigue.
- **Equal Opportunity Policy:** This policy outlines Essendi UK's commitment to provide equal opportunities and embrace diversity throughout employment. Employees should be recruited without regard to race, sex, pregnancy and maternity, civil partnership status, gender reassignment, disability, religion or beliefs, union membership, age, sexual orientation, or any other characteristic protected by law.
- **Grievance Policy:** This process encourages concerns to be raised informally in the first instance in order to encourage an open and honest culture. However, it also outlines the formal process in the event that concerns cannot be resolved through the informal route, or in more serious cases where it is appropriate to deal with matters formally at the outset. The grievance policy provides clear guidelines on how individuals can raise concerns, how those concerns will be managed, and the potential outcomes of any investigation.
- **Whistleblowing Policy:** Hotel employees have access to Accor's whistleblowing platform to report concerns relating to Accor Group activities. Essendi Group also operates its own internal whistleblowing platform, which is available to employees across hotels and support offices, as well as to third parties. Essendi UK encourages the reporting of any concerns related to its activities or supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy to make disclosures, without fear of retaliation, in whatever way the reporter feels comfortable.
- **Promoting and Protecting Social Fundamental Rights:** Essendi Group has entered into a Memorandum of Understanding (MoU) with the International Union IUF relating to

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freedom of association and union rights. This framework agreement aims to reaffirm Essendi Group's commitment to social dialogue and the non-discrimination principle. In accordance with the MoU, Essendi Group commits to provide its employees with training regarding union and employee representation to prevent and, if necessary, stop the risk. The signatories of the agreement have also set up a centralised arbitration mechanism in the event of a dispute within a country not being settled locally. Following on from the MoU, Essendi UK Hotels 1 Limited signed an agreement with the Unite Union in May 2025 to establish a works council on a voluntary basis, thereby instituting a more structured local social dialogue.

- **Protecting Children's Rights:** Essendi Group's hotel-based employees are trained on the WATCH programme, to help detect cases of sexual exploitation of children in travel and tourism ("**SECTT**"), through a variety of training/awareness-raising tools at the hotels. Based on available training records, 89% of Essendi UK General Managers have completed the WATCH e-learning, while 83% have completed the Human Rights e-learning. At UK support office, 71% of personnel have completed the relevant ethics e-learning within the last two years. Essendi UK will continue to monitor relevant training completion data and awareness initiatives, where available, to assess the effectiveness of its safeguarding, human-rights and modern-slavery risk controls.

4.8. Guests and Hotel Safeguarding Risks

As a hospitality company, Essendi Group understands that hotels may be subject to a particular risk of modern slavery and human trafficking. Specifically:

- Hotels may be used for sex trafficking where victims are compelled to provide commercial sex to paying customers.
- Victims may stay in hotels with their traffickers while moving location.

Essendi Group fully supports Accor in its action for positive hospitality. With its Ethics and CSR charter, Accor is committed to increasing awareness of human trafficking and modern slavery at all levels.

Accor has been fighting child sexual exploitation in its hotels since 2001 in partnership with an international NGO-ECPAT International. ECPAT is a global organisation that leads the fight against the crime of child trafficking and sexual exploitation.

Created by Accor, the WATCH programme helps Essendi Group's hotels to put procedures in place to detect cases of SECTT. The programme involves local training initiatives designed to heighten employee vigilance, so that they can identify cases of SECTT more effectively, decide when to contact the authorities, and offer the child alternative life paths (via reintegration projects for example).

5. Monitoring Risks

The Essendi Group has an Ethics Committee at the highest level. This committee is comprised of the CEO, the Chief Compliance Officer, Secretary of the Board of Directors and representatives of the HR and Operational functions, along with input from the ESG functions.

Its purpose is to:

- Ensure that Essendi Group's activities are conducted in accordance with its internal ethics and compliance policies;
- Answer questions or provide advice in relation to Essendi Group's internal policies (anti-corruption code of conduct, ethics charter), compliance and ethical issues;

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- Give recommendations about the evolution of Essendi Group's commitments and policies with regards to ethics and compliance (e.g., KYC Procedure, Ethics Charter and Purchasing Policy);
- Be informed about the number and type of issues reported through the whistleblowing platform such as corruption, fraud, anti-competitive practices, discrimination, workplace harassment, workplace health, hygiene and safety, and environmental protection issues;
- Give recommendations about the treatment of the reported issues;
- Share the outcomes with the executive committee;
- Monitor the compliance programme's roadmap.

The Ethics Committee meets at least twice a year and more regularly when needed.

Following a review of the effectiveness of Essendi Group's existing procedures the Committee has decided to go further in its ambition to combat slavery and human trafficking by extending its Ethics Charter e-learning to hotel general managers by the end of 2026.

Essendi UK will continue to consider appropriate measures for assessing the effectiveness of its approach, including training completion, supplier due diligence, KYC reviews, implementing audit recommendations, taking corrective actions and addressing concerns raised through reporting channels, where such information is available.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, was approved on 8th October 2026 and constitutes Essendi UK's slavery and human trafficking statement for the financial year ending 31 December 2025.

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