

FIRMDALE HOTELS MODERN SLAVERY ACT STATEMENT

This statement is made by Firmdale Holdings Limited ("Firmdale") on behalf of itself and its group subsidiaries.

Organisation Structure and Supply Chains

Firmdale operates 11 luxury hotels and 9 bars and restaurants across London and New York.

This statement is made on behalf of Firmdale, only pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Firmdale's slavery and human trafficking statement for the financial year ending 31st January 2024.

Firmdale is committed to ensuring that it conducts its business ethically and with integrity. Firmdale does not use slave labour anywhere in its own business, nor does Firmdale tolerate forced or compulsory labour or human trafficking. Firmdale is committed to ensuring that no such behaviour takes place in connection with the company.

This commitment extends to Firmdale's supply chain.

Firmdale's supplier relationships are based on lawful, efficient and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. Firmdale will not knowingly use any supplier that uses forced prison labour. Firmdale will only work with suppliers who comply with all laws regarding slavery and human trafficking in the countries in which the suppliers are doing business.

Policies in Relation to Slavery and Human Trafficking

Firmdale operates the following practices and policies of which describe their approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking:

- Support the protection of human rights, particularly those of our colleagues, the parties we do business with and the communities where we operate
- Provide a safe and healthy working environment
- Support the elimination of employment discrimination and promote diversity in the workplace
- Provide our colleagues with remuneration and tools for their roles, and take their well-being into consideration
- Conduct our business with honesty and integrity in compliance with applicable laws
- Develop and implement company procedures and processes to ensure we comply with this policy.
- Do not support forced and compulsory labour or the exploitation of children
- Corporate Social Responsibility Policy

Due Diligence and Risk Assessment Management Processes

Firmdale undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

Firmdale requires its suppliers to comply with all applicable laws and to adopt compliant working practices, including not utilising any form of compulsory labour or human trafficking. Firmdale's suppliers are obliged to pass these requirements onto their own suppliers as well, and Firmdale expects all of its suppliers to police their own supply chains in order to root out modern slavery of any kind.

Firmdale's due diligence and reviews include:

- As part of our procurement process, we periodically vet our partners and suppliers to identify and help prevent potential modern slavery or human trafficking risks in our supply chain.
- We expect our partners and suppliers to ensure that they either have equivalent policies to ours or that they abide by our policies.

Key Performance Indicators and Training to Measure Effectiveness of Steps Being Taken

Firmdale has reviewed key performance indicators, and as a result, are taking the following steps to ensure that there is no slavery or human trafficking throughout their supply chains:

- Providing training to key personnel with procurement responsibility on how to identify human trafficking and forced labour issues
- Continuing to review and amend our practices as appropriate to ensure that modern slavery and human trafficking is not present in our supply chain

Firmdale will continue to review their existing supply chain, along with potential new suppliers, and policies and procedures to address prevention of modern slavery and human trafficking.

This statement has been approved by the Board Directors of Firmdale Holdings Limited.