

FIRMDALE HOTELS MODERN SLAVERY ACT STATEMENT

This statement is made by Firmdale Holdings Limited ("Firmdale") on behalf of itself and its group subsidiaries. This statement was published on our UK website on 1st Feb 2026, within six months of the financial year end, and is accessible via a prominent 'Modern Slavery Statement' link on our homepage.

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 2026.

Firmdale is committed to conducting its business ethically and with integrity. We do not use slave labour within our own business, nor do we tolerate forced or compulsory labour or human trafficking in any form.

While we have no evidence of forced or compulsory labour within our operations or supply chains, we recognise that risks may exist. We therefore remain vigilant and actively monitor and address potential risks. Firmdale is committed to ensuring that slavery and human trafficking do not take place in any part of our business or supply chains.

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 work with any supplier that uses forced or prison labour and will only engage suppliers who comply with all laws relating to slavery and human trafficking in the countries in which they operate.

Policies in Relation to Slavery and Human Trafficking

Firmdale operates a range of practices and policies that demonstrate our commitment to preventing modern slavery and human trafficking, including:

- Supporting and protecting human rights, particularly those of our colleagues, business partners, and the communities in which we operate
- Providing a safe, healthy, and respectful working environment which is supported with both online and in person training.
- Promoting equality, eliminating employment discrimination, and supporting diversity and inclusion
- Ensuring fair remuneration with pay a structure aligned to job roles which is reviewed annually
- Multiple mechanisms in place to support colleague wellbeing including an EAP provider, Mental Health training for management and access to physical and financial wellbeing benefits for all, regardless of position
- Conducting business with honesty, transparency, and integrity in compliance with all applicable laws
- Developing, implementing, and maintaining company procedures to ensure compliance with this policy
- Prohibiting forced or compulsory labour and the exploitation of children in any form
- Operating in line with our Corporate Social Responsibility Policy

Due Diligence and Risk Assessment Management Processes

Firmdale undertakes due diligence when onboarding new suppliers and conducts regular reviews of existing suppliers. We recognise that the risk of modern slavery is not uniform across our operations or supply chains. To identify and assess potential risks, we consider factors including the type of goods and services procured, the use of third-party labour or intermediaries, geographic location of sourcing or service delivery, and recognised industry-specific risk indicators

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.

Through this assessment, we have identified the following areas as presenting a comparatively higher risk of modern slavery:

- **Food and beverage supply chains**, particularly where products are sourced through intermediaries or from regions with higher prevalence of forced labour
- **Textiles, furnishings, and décor items**, including fabrics and furniture, where production may involve complex international supply chains
- **Cleaning, logistics, and outsourced services**, where labour may be subcontracted
- **Seasonal or temporary labour**, which can present increased vulnerability to exploitation

These risks are assessed as inherent risks and do not indicate that modern slavery has been identified within Firmdale's operations or supply chains.

To assess and manage modern slavery risks, Firmdale has implemented the following measures:

- Conducting risk-based supplier due diligence, with enhanced checks for suppliers operating in higher-risk categories or regions
- Requiring suppliers to confirm compliance with applicable labour and human rights laws and to adhere to Firmdale's Code of Conduct, we periodically vet our partners and suppliers to identify and help prevent potential modern slavery or human trafficking risks in our supply chain.
- Reviewing supplier structures to understand the use of intermediaries or subcontractors
- Engaging with suppliers where risks are identified to seek clarification, assurance, or remediation
- Incorporating modern slavery considerations into procurement and supplier review processes
- Providing targeted training to colleagues with procurement responsibility to support risk identification and escalation
- We expect our partners and suppliers to ensure that they either have equivalent policies to ours or that they abide by our policies.

Where concerns are identified, Firmdale will take appropriate action, which may include enhanced monitoring, corrective action plans, or termination of the supplier relationship where remediation is not possible.

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

Firmdale reviews key performance indicators to assess the effectiveness of the steps taken to prevent modern slavery and human trafficking within its operations and supply chains. The following KPIs are used to monitor progress and drive continuous improvement:

- **Training completion:** 100% of colleagues with procurement responsibility to complete modern slavery and ethical sourcing training, reviewed annually

- **Supplier onboarding compliance:** 100% of new suppliers to sign Firmedale's Code of Conduct prior to trading
- **Supplier review coverage:** Annual review of all active suppliers, with enhanced due diligence applied to suppliers operating in higher-risk categories or regions
- **Risk identification and remediation:** All identified modern slavery risks or concerns to be documented, assessed, and addressed through appropriate action plans
- **Policy review:** Annual review of relevant policies and procedures to ensure continued effectiveness and alignment with legal and regulatory guidance

In 2025, Firmedale conducted annual supplier reviews, during which supplier Codes of Conduct and best-practice requirements were updated. 100% of new suppliers signed Firmedale's Code of Conduct as part of the onboarding process.

Firmedale will continue to review its existing supply chain and assess potential new suppliers, alongside ongoing monitoring of KPIs, policies, procedures, and training, to strengthen the prevention of modern slavery and human trafficking.

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