

PPHE Hotel Group Modern Slavery Statement 2025

1. Introduction

This Modern Slavery Statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. It outlines the steps PPHE Hotel Group (“PPHE”, “the Group”) has taken during the financial year 1 January 2025 to 31 December 2025 to prevent modern slavery and human trafficking in its operations and supply chains.

PPHE recognises the profound human impact of modern slavery and is committed to continuous improvement in identifying, preventing and mitigating risks of forced labour, trafficking and exploitation across all areas of the business. Our commitment aligns with international standards including those set by the United Nations (UN) and International Labour Organization (ILO).

2. Our Organisation, business and supply chains

PPHE is an international hospitality real estate and management group operating hotels, resorts, campsites, serviced apartments and restaurants across the UK, Netherlands, Germany, Italy, Austria, Hungary, Serbia and Croatia. In particular, PPHE controls operations directly in UK, Netherlands and Italy, while it operates in the remaining countries through its subsidiary Arena Hospitality Group (“AHG”). The Group wholly owns, co-owns and/or manages properties under the Park Plaza, art’otel, Holmes, Radisson Collection, Radisson RED, Arena Hotels & Apartments, Arena Campsites brands and TUI Blue.

Our supply chains are multifaceted and include:

- Goods suppliers: food and beverage providers, construction and refurbishment contractors, facilities suppliers, furniture and equipment manufacturers.
- Service suppliers: labour agencies, IT and technology providers, cleaning services, consulting.

Given our geographic footprint, multi-brand structure and multi-tier sourcing, we acknowledge that modern slavery risks may appear at any stage, from raw material inputs to supplier labour practices and contracted services supporting business operations.

3. Policies and Governance

Modern slavery risk is overseen by the Executive Leadership Team and the ESG Committee of the Board. In 2025, PPHE strengthened our Supplier Code of Conduct: updated requirements for labour rights, addressing child labour, working hours, collective labour agreements, harassment and other matters, in alignment with UN and ILO standards.

Internally, the Group maintains a number of policies and procedures to ensure the welfare of our workforce. Our policies are communicated to all team members and accessible on the Company intranet. The policies are also an integral part of contractual agreements with suppliers during onboarding and contract renewal cycles.

4. Assessing and Managing Risk

In line with Home Office guidance, PPHE continued to strengthen its risk assessment processes during 2025. We assess risk through worker feedback channels such as:

- Pulse Surveys: conducted every 8 months at PPHE and once per year at AHG.
- Team member forums: these are composed of team members from various departments in each hotel and enable the sharing of feedback with the senior leadership team, which is an opportunity to voice any concerns on labour conditions as well.
- Confidential reporting: confidential 24/7 channel for anyone working on our premises (whether employed directly, or by a third-party agency supplier) to safely raise concerns about suspected wrongdoing, misconduct, or unethical behaviour. (Our Whistleblower Policy sets out in detail how this tool is used as a worker protection mechanism.

The areas with the highest-priority risks identified include:

- Recruitment and labour practices involving temporary, seasonal or subcontracted workers.
- Construction and refurbishment supply chains, particularly lower-tier labour subcontracting.
- Hospitality support functions (e.g., cleaning, laundry, security).

- Agricultural and food supply chains, especially those with extensive inputs from outside of Europe (e.g., linens, cocoa, coffee).

5. Due diligence and supplier engagement

PPHE undertook the following preventive and mitigating actions:

- Strengthened engagement with suppliers through a new Supplier Code of Conduct. This establishes minimum mandatory standards and gives PPHE several explicit rights to enforce human rights, fair labour practices, and safe conditions across its supply chain.
- In our direct operations, we respond to a variety of localised risks. In 2025, we reviewed our recruitment procedures following intelligence concerning organised crime and attempts to infiltrate the housekeeping service providers of hotels. Our response to this risk included improved vetting procedures.

6. Training and awareness

In 2025, PPHE expanded its modern slavery training programme:

- Mandatory training sessions for all team members upon onboarding and then a yearly refresher. Training focuses on identifying at-risk individuals, and the correct channel for reporting suspicions or concerns.
- Role-specific training for HR, procurement, operations leadership, and front-line teams.

Training content covers recognising indicators of forced labour, reporting processes, responsible recruitment, and the Group's expectations of suppliers.

We are aware that our workforce speaks multiple languages, and that lack of skill or fluency in the official language in the country they are working in itself increases their risk profile. We take steps to ensure that our communications are properly understood by everyone.

7. Monitoring, evaluation and continuous improvement

Regularly updating our materials to ensure that they are responding to the rapidly evolving approach of those who engage in modern slavery and human trafficking is important. In addition, where incidents occur which impact our assessment of modern slavery risk, root cause analysis is used to update our protections.

8. Approval

This statement was approved by the Board of Directors of PPHE Hotel Group on 19th May 2026 and signed by the Chair of the ESG Committee Marcia Bakker on 20th May 2026.



Following approval and receiving the signature of the Chair of the ESG Committee, the statement was published on the home page of the Company's website and through the UK Government's Modern Slavery Statement Register.