

**MILLENNIUM & COPTHORNE HOTELS LIMITED**  
**MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

**For the Financial Year 1 January 2025 to 31 December 2025**  
**Issued pursuant to Section 54(1) of the UK Modern Slavery Act 2015**

**1. Introduction**

This is the tenth annual statement made by Millennium & Copthorne Hotels Limited (“M&C” or the “Company”) under section 54(1) of the Modern Slavery Act 2015 (the “Act”). It outlines the steps we have taken during the 2025 financial year to identify, prevent, and mitigate the risks of modern slavery and human trafficking in our business operations and supply chains.

We maintain a zero-tolerance approach to modern slavery in all its forms, including forced labour, bonded labour, human trafficking, and child exploitation. This commitment extends across our global operations and those of our subsidiaries and affiliated entities (the “Group”).

This statement reflects our continuing transition from a **compliance-led approach to a more embedded, risk-based governance framework**, recognising the operational complexities of managing global hospitality supply chains.

Our previous modern slavery statements are available at [Corporate Responsibility : Millennium Hotels and Resorts](#)

**2. Our Organisation and Structure**

M&C is a global hospitality company operating in over 20 countries, with approximately 7,800 employees. The Company is headquartered in London and is a wholly owned subsidiary of City Developments Limited (“CDL”), a Singapore-listed real estate company.

This statement reflects our global approach, although the Act formally applies to qualifying UK entities.

**3. Our Business Model**

We operate under a range of business models:

- Owned and managed hotels
- Managed hotels on behalf of third-party owners
- Owned but externally managed hotels
- Franchise arrangements

As noted in prior years, our level of direct control varies across these models, with the strongest oversight in owned and managed operations. In franchise and third-party arrangements, we seek alignment with our ethical standards while recognising operational limitations.



#### 4. Our Supply Chain

Our supply chain includes:

- Labour providers and staffing agencies
- Food and beverage suppliers
- Linen, cleaning and facilities services
- Furniture, fixtures and equipment
- Technology and service providers

##### **Supply Chain Risk Context**

Consistent with prior years, the **principal area of modern slavery risk remains supply chain visibility**, particularly:

- indirect and multi-tier suppliers
- offshore procurement
- franchise and asset-light models

We recognise that full verification across global supply chains is inherently complex and that businesses must rely on **risk-based due diligence, contractual protections and supplier representations** rather than absolute guarantees.

##### **(i) Due Diligence and Controls:**

During 2025, we continued to strengthen our supply chain oversight through:

- Maintenance of preferred supplier lists
- Supplier onboarding due diligence and legal compliance confirmations
- Standard contractual clauses addressing modern slavery risks
- Our continued efforts to obtain periodic supplier acknowledgement of the Supplier Code of Conduct and to encourage compliance with its principles
- Introduction of a **more structured supplier risk-ranking methodology** (based on geography, category, and exposure risk)

We prioritise higher-risk suppliers and jurisdictions, applying enhanced diligence where appropriate.

##### **(ii) Supplier Code of Conduct**

Following its introduction in the UK in 2024, during 2025 we:



- **Expanded the rollout of the Supplier Code of Conduct beyond the UK where practicable**
- Encouraged alignment across regional procurement teams

The Code addresses:

- prohibition of forced labour
- fair wages and working conditions
- ethical employment practices
- compliance with applicable laws
- provision of access to the Company's latest policies via links to regularly updated resources on the Company website

## **5. Employment Practices**

We maintain robust recruitment and employment practices across all jurisdictions in which we operate:

- (i) We seek to ensure that employment practices are conducted fairly and in accordance with applicable laws and ethical standards
- (ii) Right to Work, identity, reference, and appropriate background checks are conducted prior to employment
- (iii) Where agency labour is used, we seek to engage reputable and appropriately vetted providers
- (iv) For UK roles, we require staffing agencies to demonstrate compliance with the Act

## **6. Our Policies and Governance**

Our framework is supported by:

- Code of Ethics & Business Conduct
- Group Human Rights Policy
- Whistleblowing Policy

We encourage reporting of concerns via confidential whistleblowing channels through established governance and escalation processes.

In line with lessons learned, we continue to strengthen **documented governance processes, cross-functional coordination (Legal, Procurement, HR and Operations), and internal governance oversight.**



## 7. Risk Assessment and Management

We apply a **risk-based approach**, recognising that modern slavery risks evolve and differ across geographies and sectors.

Key elements include:

- Supplier segmentation based on risk factors
- Focus on higher-risk categories rather than uniform supplier auditing
- Ongoing review of procurement practices
- Monitoring compliance beyond onboarding

We acknowledge the practical limitations in verifying risks across indirect supply chains and continue to refine our approach to ensure proportionality and effectiveness.

## 8. Training and Awareness

We continue to provide modern slavery awareness training to relevant employees and maintain processes to monitor completion rates where such training is delivered.

- Identification of modern slavery indicators
- Reporting mechanisms
- Role-specific responsibilities

During 2025 we:

- Enhanced training materials and employee guidance
- Continued annual refresher training

## 9. Measuring Effectiveness

We assess effectiveness through:

- Monitoring whistleblowing reports and investigations
- Tracking employee training completion
- Reviewing supplier due diligence outcomes
- Monitoring supplier Code of Conduct compliance
- Evaluating procurement controls and risk assessments

We recognise the importance of ensuring that public disclosures remain **accurate, evidence-based and proportionate**, avoiding overstatement of capabilities in complex global supply chains.

## 10. Progress in 2025 and Future Actions



During 2025, key areas of progress included:

- Initial expansion of the Supplier Code of Conduct beyond the UK
- Development of enhanced training materials
- Introduction of a more structured supplier risk-ranking methodology
- Continued strengthening of procurement governance processes

Looking ahead to 2026, we will:

- Continue expanding supplier governance frameworks across regions
- Further enhance supply chain transparency, focusing on higher-risk areas
- Refine risk assessment methodologies
- Strengthen internal coordination across Legal, Procurement, HR and Operations
- Continue improving training and awareness programmes

We remain committed to continuous improvement while recognising the need for **practical, risk-based and proportionate implementation**.

#### Contact

For any questions regarding this statement, please contact:  
**Supply.Chain@millenniumhotels.co.uk**

This statement was approved by the Board of Directors of Millennium & Copthorne Hotels Limited on 25 June 2026 pursuant to section 54 of the Modern Slavery Act 2015 and is signed on behalf of the Board by a director.

Signed:

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**Kwek Eik Sheng**

**Director**

for and on behalf of the Board

**Millennium & Copthorne Hotels Limited**