

MILLENNIUM & COPTHORNE HOTELS LIMITED
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the Financial Year 1 January 2024 to 31 December 2024
Issued pursuant to Section 54(1) of the UK Modern Slavery Act 2015

1. Introduction

This is the ninth 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 2024 financial year to identify, prevent, and mitigate the risks of modern slavery and human trafficking in our business operations and supply chains.

We are committed to ensuring that our hotels and business practices are free from all forms of modern slavery, including forced, bonded, or compulsory labour, and child exploitation. This commitment extends to the operations of our subsidiaries and affiliated entities worldwide (collectively referred to as the “Group”, “we”, “us”, or “our”).

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 with operations in 22 countries and a workforce of approximately 7,596 employees. The Company is headquartered in London and is a wholly-owned subsidiary of City Developments Limited (CDL), a Singapore-listed real estate company.

While the legal requirement under the Act applies to UK-based companies with an annual turnover of at least £36 million, this statement reflects our global approach and commitment to ethical and responsible business practices across all subsidiaries of M&C. A full list of our subsidiaries is available in our latest Annual Report and Accounts at: Financial: Millennium Hotels and Resorts.

3. Our Business Model

M&C operates hotels under various business models, including:

- (i) Owned and managed hotels (majority of our portfolio)
- (ii) Managed hotels on behalf of third-party owners
- (iii) Owned but externally managed hotels
- (iv) Franchise agreements

Our ability to enforce policies and procedures varies depending on the nature of the relationship. We maintain the highest control in owned and directly managed hotels, where our internal governance, training, and policies apply in full. In other arrangements—particularly



franchise or third-party-managed properties—we actively encourage alignment with our ethical standards but acknowledge that day-to-day operational control lies with our partners.

4. Our Supply Chain

Our global supply chain includes providers of goods and services such as staffing, equipment, furnishings, food, beverages, amenities, and cleaning products.

We expect all suppliers to comply with applicable laws and to uphold ethical practices in line with international human rights standards. We have zero tolerance for modern slavery and will sever relationships with suppliers found to be non-compliant.

(i) Supply Chain Controls and Due Diligence:

- Preferred supplier lists are maintained and monitored
- New suppliers undergo onboarding due diligence, including completion of a Supplier Set Up Form confirming commitment to the Act

(ii) Supplier Code of Conduct

In 2024, we introduced a new Supplier Code of Conduct applicable to all suppliers of UK-owned and managed hotels. The Code addresses:

- Ethical labour practices
- Prohibition of forced labour
- Fair wages and safe working conditions
- Supplier acknowledgment of compliance with the Code is reviewed annually

5. Employment Practices

M&C maintains robust recruitment and employment practices across all jurisdictions in which we operate:

- (i) All roles are filled through free and fair employment processes
- (ii) Right to Work, identity, reference, and DBS checks (where applicable) are conducted prior to employment
- (iii) Temporary and agency labour is sourced through vetted and approved providers
- (iv) For UK roles, all staffing agencies must demonstrate compliance with the Act

6. Our Policies and Governance

Our approach to preventing modern slavery is underpinned by a suite of policies, including:

- (i) Code of Ethics & Business Conduct
- (ii) Group Human Rights Policy
- (iii) Whistleblowing Policy



These policies reinforce our values and establish clear expectations for employees and partners. We encourage the reporting of suspected non-compliance through our whistleblowing programme, administered independently by CDL's Internal Audit function. Reports of non-compliance are investigated promptly and confidentially.

Governance oversight is provided by both the M&C Board of Directors and the Board of CDL, supported by their respective Audit & Risk Committees.

7. Risk Assessment and Management

We use a risk-based framework to assess and manage the risk of modern slavery in our operations and supply chain. This includes:

- (i) Standard contractual clauses requiring suppliers and their subcontractors to comply with the Act and our Group Human Rights Policy
- (ii) Supplier segmentation based on spend, service type, geography, and risk exposure
- (iii) Ongoing review of procurement practices and supplier onboarding
- (iv) Future focus on reassessing high-risk categories and geographies

We recognise that modern slavery risks evolve, and we remain committed to enhancing our due diligence and risk mitigation frameworks.

8. Training and Awareness

All employees are provided with mandatory online training on modern slavery, including how to identify signs of exploitation and how to report concerns. Training includes:

- (i) An interactive module with testing to ensure understanding
- (ii) Annual refresher training
- (iii) Centralised tracking of completion rates

This programme is critical in fostering a culture of vigilance and accountability.

9. Measuring Effectiveness

We monitor the effectiveness of our modern slavery compliance programme through:

- (i) Timely investigation and resolution of all whistleblowing or reported incidents
- (ii) Tracking employee training completion and understanding
- (iii) Ongoing supplier due diligence and review
- (iv) Monitoring supplier acknowledgment of the Supplier Code of Conduct
- (v) Inclusion of relevant obligations in supplier contracts

We recognise that continuous improvement is essential and regularly review our systems and practices.



10. Future Actions

Looking ahead to 2025, we will continue to develop our programme and remain committed to safeguarding human rights and upholding ethical business practices throughout our operations and supply chains.

Contact

If you have any concerns, questions or suggestions regarding this statement or our approach to modern slavery, please contact:

Supply.Chain@millenniumhotels.co.uk

This statement was approved by the Board of Directors of Millennium & Copthorne Hotels Limited on 26 June 2025.

Signed by:

Kwek Eik Sheng

Director

for and on behalf of the Board

Millennium & Copthorne Hotels Limited