

**Lore Group Property**  
**Financial Year 2019**  
**Modern Slavery Statement**

**Introduction**

This statement is published in accordance with Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Sea Containers London ("SCHL") during the financial year ending December 2024 to identify, prevent, and mitigate the risk of modern slavery.

Modern slavery is a crime and a violation of fundamental human rights which takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking ("Modern Slavery"). SCHL does not tolerate Modern Slavery and conducts its business in a fair, ethical, and responsible manner and is committed to its responsibilities to respect and uphold human rights across its business, workforce, and sphere of influence.

Previous versions of SCHL's Modern Slavery Statements are publicly available on SCHL's website: <https://www.seacontainerslondon.com/modern-slavery-statement/>

**Organisation Structure & Supply Chain**

SCHL is a hotel, based in London and part of the Lore Group Collection <https://loregroup.com/about-us/>. SCHL has 359 guest bedrooms; 1 restaurant; 2 bars; banqueting spaces; cinema and a spa. SCHL's supply chain comprises reputable companies/agencies located worldwide who supply such goods and services as necessary for the safe and continued operation of the hotel facilities.

**Policies/Due Diligence Processes in Relation to Modern Slavery**

In keeping with its wider commitment to act ethically and with integrity in all its business activities and relationships, SCHL maintains policies and procedures, including due diligence processes, which assist in the identification, prevention, and mitigation of risks in relation to Modern Slavery, including:

**Anti-bribery and corruption policy:** This sets out SCHL's approach to prevent and detect bribery and corruption, addressing practices which may be indicators of Modern Slavery risks.

**Health and Safety Policy:** Procedures for ensuring compliance with international labour standards, covering compliance with standards for working and employment conditions, and child labour/protection arrangements prohibiting the employment of children.

**People and Culture:** SCHL does not use forced or compulsory labour. SCHL's employees are recruited and provided with working conditions that comply with all applicable laws and regulations. Guidelines cover personnel conduct, including any form of discrimination, harassment, abusive conduct, and unlawful activity.

**Recruitment procedures:** These include arrangements for checking, validating licenses, right to work permits and identity.

**Security procedures:** Undertaking compliance procedures for all residents of the hotel including registration and payments.

**Sexual Harassment Policy:** This sets out SCHL's approach to prevent and detect the risks of harassment and trafficking, addressing practices which may be indicators of Modern Slavery risks.

**Supplier Responsible Sourcing Policy:** This sets out SCHL's supplier management and requirements.

**Whistle-blowing policy:** To deal with any concerns in respect of internal or external activity, including in relation to the management of SCHL's suppliers or impacts on SCHL supply chain, with safeguards to protect any whistle-blowers.

SCHL's policies and procedures (including those related to Modern Slavery) are kept under continuous review and these are updated periodically as appropriate.

### **Risk Assessment & Management**

SCHL expects all personnel and counterparties in its supply chain to comply with all applicable laws and regulations and to maintain high ethical standards. SCHL will carefully monitor such matters and reserves the right to cease trading with such counterparties and take any other action as appropriate.

SCHL has assessed the specific Modern Slavery risks within the hospitality sector including, without limitation:

1. Human trafficking through the guest arrival experience.
2. Human trafficking through inadvertently employing an employee through agency services.
3. Heightened risks in dealing with companies based in jurisdictions which do not have equivalent standards to the UK for design, operational and mechanical FF&E.

SCHL's policies and procedures are designed to address these risks and are communicated to all relevant employees. SCHL continues to monitor Modern Slavery risks in its business activities, and to adapt its procedures, activities, and priorities as appropriate in line with its commitment to responsible business practices and national/international guidelines.

### **Key Performance Indicators to Measure Effectiveness of Steps Taken**

SCHL policies and procedures facilitate the identification of Modern Slavery risks within its business activities, either through the raising of any potential violations of law or internal arrangements by personnel or through oversight arrangements (including management information, its internal audit program and security management), enabling management to actively consider and to enhance existing arrangements to further mitigate such risks.

SCHL is committed to improving its practices to combat Modern Slavery, continuing to evolve the way in which it identifies and mitigates Modern Slavery risks within its business activities, and to measure the effectiveness of its policies and procedures, ensuring they remain appropriate in consideration of the identified risk and the size and operations of the company.

SCHL monitors industry and regulatory developments pertaining to modern slavery considerations and during this period has continued to review and update its relevant policies and procedures, enhancing its practices as appropriate. Training on Modern Slavery is available for all SCHL employees: a) they receive on-boarding training on SCHL's policies and procedures and receive ongoing training as appropriate, and b) they are provided with access to Workday, Lore Group's People and Culture Software and Training App, which contains all information pertaining to SCHL's policies and procedures.