

MODERN SLAVERY STATEMENT 2024

VIRGIN HOTELS COLLECTION

Introduction

This statement has been published in accordance with Section 54 of the UK Modern Slavery Act 2015. It sets out the steps taken by Virgin Hotels Collection (VHC), for the financial year ending 31 December 2024, to prevent modern slavery and human trafficking in its own business operations and supply chains.

VHC comprises Virgin Limited Edition (VLE) and Virgin Hotels (VH), all hereafter referred to as “VHC;” “we;” and “our.” VHC operates through a mixed business model that includes managing and owning hotels and providing hospitality services.

VHC’s purpose is ‘Everyone Leaves Feeling Better’ and is dedicated to responsible business practices and good governance. We aim to conduct our operations ethically, lawfully, and safely and are committed to respecting the human rights of the communities in which we operate. We expect our partners and suppliers to adhere to the same standards and uphold these rights in their own supply chains. We will not tolerate modern slavery in any form and are committed to combating it within our organisation and communities.

Key Focuses

In 2024, we sought to understand our key modern slavery risk areas better and introduced modern slavery updates at our Executive and Board meetings, along with employee training and inductions. This initiative has established a strong foundation for further progress in 2025 and beyond.

Organisation structure and supply chains

VHC operates 17 hospitality properties across eight countries, with headquarters in London and Miami.

VHC operates in the USA, the British Virgin Islands, the UK, Switzerland, Spain, Morocco, South Africa and Kenya.

Our supply chains **encompass** hotel operations, construction, and community partnerships. We prioritise local sourcing to support entrepreneurship and economic resilience in our communities.

Modern slavery oversight is shared across Operations, Purchasing, People, Finance, and Legal departments, with ultimate accountability resting with the Chief People Officer. Key contacts include:

- - VP of Operations
- - Group Sustainability and Operations Project Manager
- - Group Head of Operations

Policies on Modern Slavery and Human Trafficking



VHC maintains a zero-tolerance approach to modern slavery. We have numerous policies and procedures that ensure our hiring and operational practices mirror our commitment to zero tolerance for modern slavery in our supply chain. These include:

- Whistleblowing and grievance mechanisms
- Responsible for recruitment and onboarding procedures
- Anti-bribery and anti-corruption policies
- Data protection and GDPR compliance

Due diligence processes

We tailor our diligence processes to fit our property locations, as each hotel brand's business model differs. The VLE properties are typically smaller and located in more rural locations. At each property, we aim to work with local suppliers and have established relationships to visit suppliers' premises, meet staff and conduct checks. Supplier assessments are encouraged throughout the year, but each property decides on the best approach based on its operations.

VLE actively employs from within the local community; therefore, our staff are positioned to hear firsthand any possible concerns with suppliers. Our General Managers encourage their employees to alert them of any issues that could affect the business. Yet we understand that there is greater work to do to educate and empower staff to come forward with these potential supply chain risks. However, this will be a focus area for the coming year.

The VH properties are all in urban environments in primary and secondary cities in the US and UK. VH utilises a central procurement provider to source key operational equipment, which provides standardisation around the Virgin Hotels group. To support our staff in reporting any modern slavery concerns, we have a dedicated ethical hotline for our VH employees, which a third party initially investigates. Following this, the matter is brought to the Chief People Officer, who decides upon next steps and escalates it to the CEO and other executive team members if necessary. We plan to roll this out across VLE in the future.

Training and Awareness

As with our due diligence process, our training is also tailored for both VLE and VH. This allows us to target our employees in ways that will have the greatest impact.

In 2024, VLE trialled various training providers to accommodate its diverse workforce, comprising many cultures, languages, and computer literacy levels. Engaging with different training providers helped us understand personalized awareness needs within our regions.

To begin with we focused our training on our London Head Office employees, where 88% of employees undertook Modern Slavery training. We are working to translate this training and engage around VLE Properties this coming year

At VH, essential modern slavery training is managed by the on-property People teams, overseen by the VP of Operations and the Chief People Officer. Furthermore, we are aware of the risk associated with hotels in urban areas, and we work with local police forces to instigate awareness and training opportunities.

Responsible recruitment

Although different legal requirements apply in our different territories, our responsible recruitment procedures include comprehensive pre-employment checks, ensuring a fair interview process for all applicants, providing necessary adjustments, and using trusted and responsible agencies and recruitment boards.

Priorities for the future

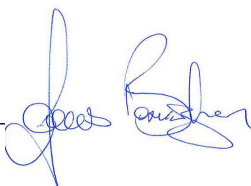
Looking ahead to 2025, we plan to create a stronger foundation for establishing modern slavery awareness and highlighting where our risks lie.

These priorities include:

- Circulating our online modern slavery training around our VLE properties, which includes different language translations to allow the training to be more accessible to a greater number of employees.
- Expanding our US ethical hotline to be available to all our territories
- Deciding Key Performance Indicators; this will include training objectives, increasing supplier visits, and promoting local suppliers for better visibility.
- Conducting a gap analysis between this statement and the updated 2025 TISC guidance on Modern Slavery reporting
- Supporting Modern Slavery awareness events run throughout the Virgin Group

Authorised by

This statement was approved by the Board of VHC OPCO LIMITED.

Signed by  —

Date: 08 / 08 / 2025

Position Chief Executive Officer