

Modern Slavery Act Statement

21/04/2023

citizenM

Modern Slavery Statement for the financial year
1 January to 31 December 2023

Business and supply chain overview

citizenM is publishing this statement in compliance with the UK Modern Slavery Act 2015 for its financial year 1 January to 31 December 2023. It covers all companies in the citizenM group. The statement details citizenM's approach towards modern slavery, human trafficking and child labour in its business and supply chain. citizenM is an owner-operator of hotels designed around a new type of traveller – one who values a luxury hotel experience in central city locations but at an affordable price. citizenM is headquartered in the Netherlands.

modern slavery and human trafficking

citizenM wants to do the right things for its guests, employees, business partners, the community and, where possible, those involved in its supply chains. Behaving appropriately and ethically in all of our dealings and under all circumstances is an essential part of this. No modern slavery, human trafficking and child labour will knowingly be permitted, supported or endorsed through our business or supply chain at any time. Our policy is to act ethically and with integrity in all our business relationships.

Steps were taken to ensure modern slavery and human trafficking are not taking place in our business or supply chains.

Employees

All our employees are required to comply with the citizenM Rules, which define desired attitudes and provide guidance on appropriate behavior within citizenM, and cover amongst other things our commitment to human rights. New employees receive the citizenM Rules as part of their immersion documentation. Furthermore, employees receive regular training on interpreting and understanding the citizenM Rules. Our US hotel employees were given mandatory specific human trafficking training.

Suppliers

We expect our suppliers to commit to the fundamental principles underlying our citizenM Rules and to act in accordance with the spirit of the citizenM Rules.

We are implementing controls to ensure that we verify our suppliers' compliance with such commitment thus helping to ensure that modern slavery, human trafficking and child labour is not taking place anywhere in our supply chain.

We have a set of clear Responsible Procurement Principles for our suppliers. In 2022, we continued to use our risk framework to identify potentially high-risk suppliers - looking at environmental, social and governance including human rights. Suppliers identified were asked

to take part in assessments.

In addition to our Responsible Procurement Principles, we partner with EcoVadis, a supplier assessment platform, who actively help us to assess our suppliers on 21 ESG criteria. This includes evidence-based checks against globally recognized human rights standards for slavery and human trafficking such as the Guiding Principles on Business and Human Rights, the United Nations Global Compact and ISO 26001. In 2022, a further 23 strategic suppliers participated in assessments.

Policy

To bring further clarity to our commitment to Human Rights, we published a specific Human Rights policy, which clearly sets our principles on key focus areas of Human Rights that impact our business.

Reporting concerns

Employees and stakeholders are encouraged to raise a concern if they believe an issue is in violation of the law or not entirely in line with citizenM's values or the citizenM Rules through our Speak Up Procedure. This includes concerns related to human rights and modern slavery.

In 2022, we introduced a new independent Speak Up Platform called Speeki. Speeki is available 24/7 365 days a year to raise concerns confidentially and anonymously and in multiple languages. Any (suspected) violation of the citizenM Rules can be reported via the [Speeki Webportal](#).

Employees are encouraged to raise concerns first with a line manager, if it is impossible to do so, concerns can also be raised with citizenM's local councillors or citizenM's confidential advisor. The confidential advisor can be contacted at confidentialadvisor@citizenm.com. An employee or stakeholder who reports (suspected) misconduct in good faith will not suffer any detriment as a consequence of his or her report.

Looking forward

citizenM is focused on further developing our approach to human rights, including mandating training in hotels and combating modern slavery.

This statement is provided in compliance with s.54 Modern Slavery Act 2015 and has been approved by the board of directors of citizenM Holding B.V.

N.P. van Lookeren Campagne, CEO, on behalf of the board of directors of

citizenM Holding B.V.
citizenM Financial Holding B.V.
citizenM Operations Holding B.V.
citizenM Properties Holdco 1 B.V.
citizenM Operations Holdco 1 B.V.
citizenM LND Lavington Properties B.V.
citizenM LND Shoreditch Properties B.V.
citizenM LND Tower Hill Properties B.V.

citizenM Glasgow Properties B.V.
citizenM London Bankside Operations B.V.
citizenM London Shoreditch Operations B.V.
citizenM LND Tower Hill Operations B.V.
citizenM Glasgow Operations B.V.
London Hammersmith Operations Limited
citizenM London Victoria Properties B.V.
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