

Modern Slavery and Human Trafficking s.54 Statement

This statement, which relates to the financial year ended 31 December 2021, is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and outlines the steps we have taken as an organisation to assess our operations and supply chains and mitigate risks associated with slavery and human trafficking.

Selina Hospitality PLC and each of its respective subsidiaries and affiliated companies worldwide (collectively, “Selina” or the “Company”) is a global hospitality company that operates across 25 countries and employs approximately 1,600 people across 163 open or secured locations. As a responsible Company, we fully support the aims of the Act and are committed to upholding human rights and conducting business ethically and responsibly. As part of these efforts, we believe that slavery and human trafficking have no place in society and have adopted a zero tolerance approach. We are taking steps to ensure that no one is being held in slavery or servitude, or is required to perform forced or compulsory labour, and to prevent others from arranging or facilitating the travel of individuals with a view to exploiting them. We continue to focus our efforts in the areas where we believe there to be the greatest risk.

During 2021, we did not find, nor were we made aware of, any instances of modern slavery within our own business or within our supply chain.

Our business

Our Company is geographically diverse, including operations in North, Central and South America, Europe and the UK, Morocco, Israel and Asia Pacific, including Thailand and Australia. The group operates under different business models. In most cases, we lease hotels through subsidiary entities and operate them. In other cases, we enter into joint venture arrangements for the operation of a particular business. With each business model, we are able to exercise varying degrees of control over operational policies and procedures and the review and selection of suppliers.

We are able to exercise the most control where we lease and manage hotels. In those cases, which account for the majority of the Company’s hotels, we rely on our Relevant Policies and related training and procedures to help manage the risks of slavery and human trafficking.

Where we have entered into joint venture arrangements, we may have more limited control or influence over our business partners and therefore may not be able to fully dictate operational compliance with our Relevant Policies.

Training and policies

We recognise that training on modern slavery and human trafficking is an important part of increasing awareness, as well as mitigating risks, within our business and supply chains. By training our workforce, we can ensure our employees understand our values, what they mean,

and what is expected of them. In addition, we strive to set out our expectations, as clearly as possible, for how our suppliers and business partners ought to conduct their operations. Our policies, including our Code of Ethics & Business Conduct, Selina Human Rights Policy and Whistleblowing Policy (the “Relevant Policies”) underpin our training efforts, and we have a robust governance structure in place to oversee the implementation of and compliance with these policies across our business.

Our Selina Human Rights Policy in particular sets out our commitment to certain human rights principles, including those outlined in the United Nations Universal Declaration of Human Rights (as applicable), such as:

- Operating to high ethical standards
- Equal treatment of employees to prevent discrimination
- Ability to work in an environment free of physical, psychological or verbal abuse, the threat of abuse and sexual or other harassment
- Ability of employees to freely choose employment; no forced or bonded labour is permitted Working in a healthy and safe environment
- Payment of wages and benefits for a standard working week that meet or exceed the minimum national requirements
- Freedom of association and the right to collective bargaining
- The long-term objective of eliminating child labour globally.

We encourage our colleagues to report non-compliance with these Relevant Policies, and we provide for a means of raising concerns and, as appropriate, redress without fear of reprisal. Where our policies are not followed, we may take disciplinary action, up to and including termination of employment, depending on the nature of the infraction. Similarly, if a contractor or supplier fails to act consistently with our expectations or their contractual obligations, this failure may result in termination of their contract or the selection of an alternative provider.

In 2021 we required all corporate employees and managers across the Group to sign our Human Rights Policy to demonstrate commitment to our standards and aspirations.

We had aimed to roll-out online learning courses across the group, but were not able to fully implement this in 2021. Appropriate training will be evaluated in 2022, to ensure we target those who are most exposed to the potential risk of modern slavery - either in our own business or our supply chain.

Assessing and managing risks

We recognise the two main areas of risk for modern slavery in our business as being the recruitment and onboarding of staff and within our supply chain. We further recognise that based on Walk Free’s Global Slavery Index 2018, certain countries in which we operate have higher risks than others.

The Board of Directors, supported by the Company's compliance team, ultimately is accountable for the Company's risk management control environment. While the directors provide oversight, the Company's Executive Committee—which is chaired by the group's Chief Executive Officer and comprised of regional and functional heads—owns and manages the key risks on a day-to-day basis.

Our supply chain

As a hotel company, we purchase various goods and services, ranging from furniture, fixtures and equipment to operating supplies, food and beverage items, and many types of services, including outsourced cleaning services, maintenance services, consulting services and other similar services. Typically, our local country teams source goods and services domestically with limited overseas sourcing. By definition, therefore, most of our sourcing occurs in countries with a lower risk of modern slavery. During 2022 and 2023, we will provide further sourcing guidance to our operations in higher risk countries.

Selection of business partners

With regard to our business partners and suppliers, we continue to select such parties carefully and, where possible, conduct due diligence on them so that we are comfortable that we are doing business with trusted, known parties. We encourage them to comply with our policies and standards, often raising awareness of our policies as part of our procurement tender processes, for example, or we expect that they will have in place similar policies. We also endeavour to include contractual clauses that require them to comply with applicable laws and our Selina Human Rights Policy. Our approach is to develop long-term relationships with business partners and suppliers whose policies, values and cultures are aligned with our own.

Our employees

Our employees are subject to various checks to ensure they have the right to work in the relevant jurisdictions in which they work and we comply with local laws and regulations in terms of our hiring practices. Where we use external agencies to provide staff, we engage reputable and trusted agencies, which are subject to the same due diligence processes as other suppliers, and require them to have adequate processes and procedures in place in terms of their hiring processes. We also implement pre-employment checks and review references for key employees and contractors and seek to require our suppliers to operate the same level of compliance through contractual obligations.

Our Global Diversity, Equity, and Inclusion approach sets out our commitment to not discriminate when recruiting employees on the basis of a person's age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership.

During 2021, we appointed a Director of ESG to help us to build-out our commitment to human rights and other ESG matters. In 2022, we appointed a Director of Compliance and Ethics to better monitor how well we, and our suppliers, comply with our policies and controls.

Looking ahead

We know that our colleagues are passionately committed to hospitality and our vision and values, and we believe that this passion, along with our Relevant Policies and related procedures, will help to reduce the risk of modern slavery and human trafficking within our organisation. However, we are never complacent and are committed to developing our practices further, while working collaboratively with our suppliers and contractors to share best practice. In 2022 and 2023, in addition to the action items highlighted above, we hope to further evaluate the risks posed within our own business and provide necessary responses to possible new risks identified.

Whistleblowing line

We operate an independent whistleblowing line that employees and stakeholders can call 24 hours per day, seven days per week, 365 days per year. In 2021 we received 12 reports. No reports were related to modern slavery matters.

How to raise concerns

If you are an employee, contractor or supplier and have any concerns over slavery or human trafficking within the Selina group, at any of our properties or throughout our supply chains, please contact us at compliance@selina.com or using the following dedicated whistleblowing website, selina.ethicspoint.com. We appreciate the cooperation of our employees and other stakeholders, and we look forward to hearing any thoughts you may have and sharing our progress with you in the future.

This statement was approved by the Nominating & Corporate Governance Committee of the Board of Directors of Selina Hospitality PLC on 15 December 2022.



Rafael Museri
Chief Executive Officer and Director