



BELMOND

## MODERN SLAVERY ACT STATEMENT

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps Belmond Management Limited ("BML") has taken during its financial year ending 31 December 2019 to ensure that slavery, servitude, forced or compulsory labour, and human trafficking (collectively, "Modern Slavery") is not taking place in any part of its business or in its supply chains.

### Organisation's Structure

During 2019, BML was a subsidiary of Belmond Ltd. On 17 April 2019 Belmond Ltd.'s A shares were acquired by Palladio Overseas Holding Limited, a subsidiary of LVMH Moët Hennessy - Louis Vuitton SE.

### Belmond's Business

Belmond Ltd. and its subsidiaries ("Belmond") is a global collection of exceptional hotel and luxury travel adventures, including trains, river cruises and safaris, in some of the world's most inspiring and enriching destinations. BML provides management services in support of group portfolio assets that are located in over 20 countries around the world.

Belmond embraces, supports and respects the human rights of everyone it works with. We do not use or accept forced, bonded or involuntary labour or child labour.

We are committed to providing appropriate pay, benefits and terms and conditions of employment and to seeking agreement for changing these, where required, to meet business objectives. We employ hiring procedures and have implemented employment policies to mitigate the risk of Modern Slavery in our business operations.

### Belmond's Supply Chain

Belmond's suppliers fall into two broad groups: those who provide goods and services used in operation of our trains, cruises and hotels, such as food and beverages, linen and cleaning supplies, and fixtures, fittings, equipment and maintenance services; and those suppliers who provide support services to the wider business such as IT support and systems, professional and consultancy services and office supplies.

We expect our employees to act diligently when selecting suppliers and to base their selection decisions on objective criteria such as value received, quality, price and service.

### Policies and Practices

Belmond's commitment is to act with integrity in all its business dealings and to promote ethical conduct to maintain compliance with applicable law and to provide guidance with respect to business conduct. Belmond has several policies that are relevant to this commitment, which set out what Belmond expects from its employees and its suppliers.

Key policies are:

### Belmond Supplier Code of Conduct

Belmond expects its suppliers to share its commitments and to act in full compliance with all applicable laws, including all national, local and international laws relating to the management of their businesses. In addition, we expect our business partners to adhere to ethical business conduct and professional standards consistent with our own and to share our commitment to the rule of law wherever we operate.

Our Supplier Code of Conduct and the standard terms and conditions of our contracts with suppliers, oblige suppliers to comply with - and to ensure their suppliers within the supply chain comply with – all



applicable laws, including those related to preventing human trafficking, forced labour and the exploitation of children.

### **Belmond Code of Conduct and Training for Belmond Employees**

Our commitment to human rights is set out in our Code of Conduct, the framework for which is provided by our core values – Care, Confidence, Curiosity and Community. The Code of Conduct, and the various written policies that support it, are designed to underpin and reinforce our commitment to human rights and the importance of a corporate culture founded on ethics, integrity and compliance with the laws of the jurisdictions in which we operate.

Our Code of Conduct is applicable to our employees and is available in 10 languages. The Code of Conduct specifically references our commitment to protecting human rights, including preventing human trafficking, forced labour and the exploitation of children. Failure to comply with this Code may result in disciplinary action, including termination of employment. All of our employees are required to receive on-boarding and annual training, covering Code of Conduct training (which includes our core values) and Modern Slavery training.

### **Speak Up! Policy**

To further support our Code of Conduct and our Supplier Code of Conduct, we provide an ethics hotline that employees and any of our stakeholders or any other third party may use to report to Belmond for investigation suspected violations of law, breaches of our Codes or other abuses, including Modern Slavery. Our ethics hotline is staffed by an independent third-party operator 24 hours a day, seven days a week. It is accessible by telephone or online and, where permitted by local law, reports can be made anonymously. All reports are reviewed and we are committed to investigating and responding to any concerns in a prompt and responsible manner. Retaliation is not tolerated against any reporter who makes a report in good faith.

We are proud of the steps we have taken to raise awareness of the risks of Modern Slavery but we remain committed to remaining vigilant about how we can improve our practices in this area.

The Board of Directors of Belmond Management Limited has approved this statement and it has been duly signed by the following director:

  
Abigail Hunt (Nov 17, 2020 12:56 GMT)

Abigail Hunt  
SVP Legal  
17 November 2020