

THE LANGHAM

LONDON

Great Eagle Hotels (UK) Ltd, trading as The Langham, London

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out The Langham, London's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year of 1st January 2026 to 31st December 2026.

As part of the hospitality sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Our organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisation structure and supply chains

This statement covers the activities of Great Eagle Hotels (UK) Ltd., trading as The Langham, London, which is a European trading entity of a global business, based in Hong Kong and trading world-wide. The Company is ultimately owned by Great Eagle Holdings Ltd. Our business activity is the provision of Hotel, Food & Beverage and ancillary leisure service to the London market. Comprising 380 bedrooms, 4 Restaurant and Bars, Meetings & Events spaces and Spa & Leisure facilities, the hotel's target market is the discerning traveller, whether business or leisure.

We believe and practice fairness, trust, integrity and respect and value the diversity of people and thought. Every colleague lives the values and practices the essentials of our organisational culture. We build great memories for our guest as that is 'The Langham Way'.

Our supply chain consists of reputable suppliers that provide goods and services to enable us to carry out our business activities. We expect all of our suppliers to comply with relevant legislation including the UK Modern Slavery Act and this is part of our due diligence process when selecting suppliers.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The Company is committed to fostering an environment of openness and will support whistleblowers who raise genuine concerns, even if those concerns later turn out to be mistaken. Our whistleblowing procedure is designed to facilitate making disclosures without fear of retaliation. Anyone with concerns can raise them internally, either through an internal email or a confidential hotline to Great Eagle Holdings Ltd. Alternatively, concerns can be reported externally to Public Concern at Work, an independent whistleblowing charity, or through Hospitality Action, which provides our Employee Assistance Programme.
- **Employee Ethics Code of Conduct:** We commit to operating our business with integrity and in accordance with the highest ethical standards. The Company observes both the form and spirit of the laws and regulations in the countries where it conducts business. Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We

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strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier Code of Conduct:** We are dedicated to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code. We reserve the right to conduct scheduled and unscheduled inspections of suppliers' facilities to ensure compliance with our Code of Conduct. When violations are found, we will agree on a corrective action plan that eliminates the problem. If it is determined that suppliers knowingly and/or repeatedly violate this Code of Conduct, we reserve the right to take appropriate corrective action, including the cancellation of orders and/or termination of business with the supplier in question.
- **Corporate Social Responsibility Policy:** We are committed to respecting the human rights of our colleagues and everyone we engage with during the course of our business operations. We strive to comply with all existing legislation and aim to elevate our corporate social responsibility by implementing best practices to reduce environmental and social risks.

Due Diligence

As part of our efforts to mitigate the risk associated with slavery and human trafficking, we have taken the following actions:

- we have included ethical issues within our Corporate Social Responsibility Policy;
- we screen our main suppliers and agencies to ensure there is no modern slavery, bonded working or human trafficking directly connected with our business and the services we provide;
- we have undertaken a supplier screening programme to inform our main suppliers of our objectives and have encouraged them to take leadership in this area;
- if we discover indications that our business is being associated with illegal practices (including prostitution and child exploitation) we will report such activity to the police and bar any perpetrators from our premises; and
- we adjust our procurement policies and procedures to eliminate the possibility of child labour, worker exploitation and human trafficking associated with the general products and services we procure, with particular reference to sources of cotton for linen and towels; sources of tea, coffee and sugar as well as other 'at risk' foods; and, sources of jewellery and craft products.

Risk Assessments

Modern slavery is a serious issue that requires ongoing commitment and action. Our Modern Slavery risk assessment aims to identify and evaluate the potential risks of modern slavery within our operations and supply chain. By conducting thorough risk assessments and implementing effective remediation strategies, we can play our part in eradicating modern slavery from our operations and supply chains.

Training

We require employees within our organisation to complete a training on modern slavery. The training is aimed at raising awareness of modern slavery and human trafficking in the hospitality industry, and covers the following topics:

- the definition of the term, legislation covering this area and common types of modern slavery;

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- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative; and
- what messages and guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.

Key performance indicators

We currently do not have an agreed set of key performance indicators (KPIs) to measure our effectiveness in preventing slavery and human trafficking within our business and supply chains. We do, however, remain committed to continuously monitor, evaluate and take any necessary actions if we identify potential risks.

This statement was approved on 1st March 2026 by the Managing Director, who reviews and recommends updates on an annual basis.

Director's name: Stefan Soennichsen

Director's signature:



Date: 01.03.2026