

# MODERN SLAVERY STATEMENT

Year ending 31 December 2022

---



**BELMOND**

# Contents

---

1. Our commitment
2. Our business and supply chains
3. Our policies and training
4. Due diligence and risk assessment
5. Key performance indicators

“We are committed to trading ethically, sourcing responsibly and to working to prevent modern slavery and human trafficking from occurring throughout our organisation and our supply chain.”

---

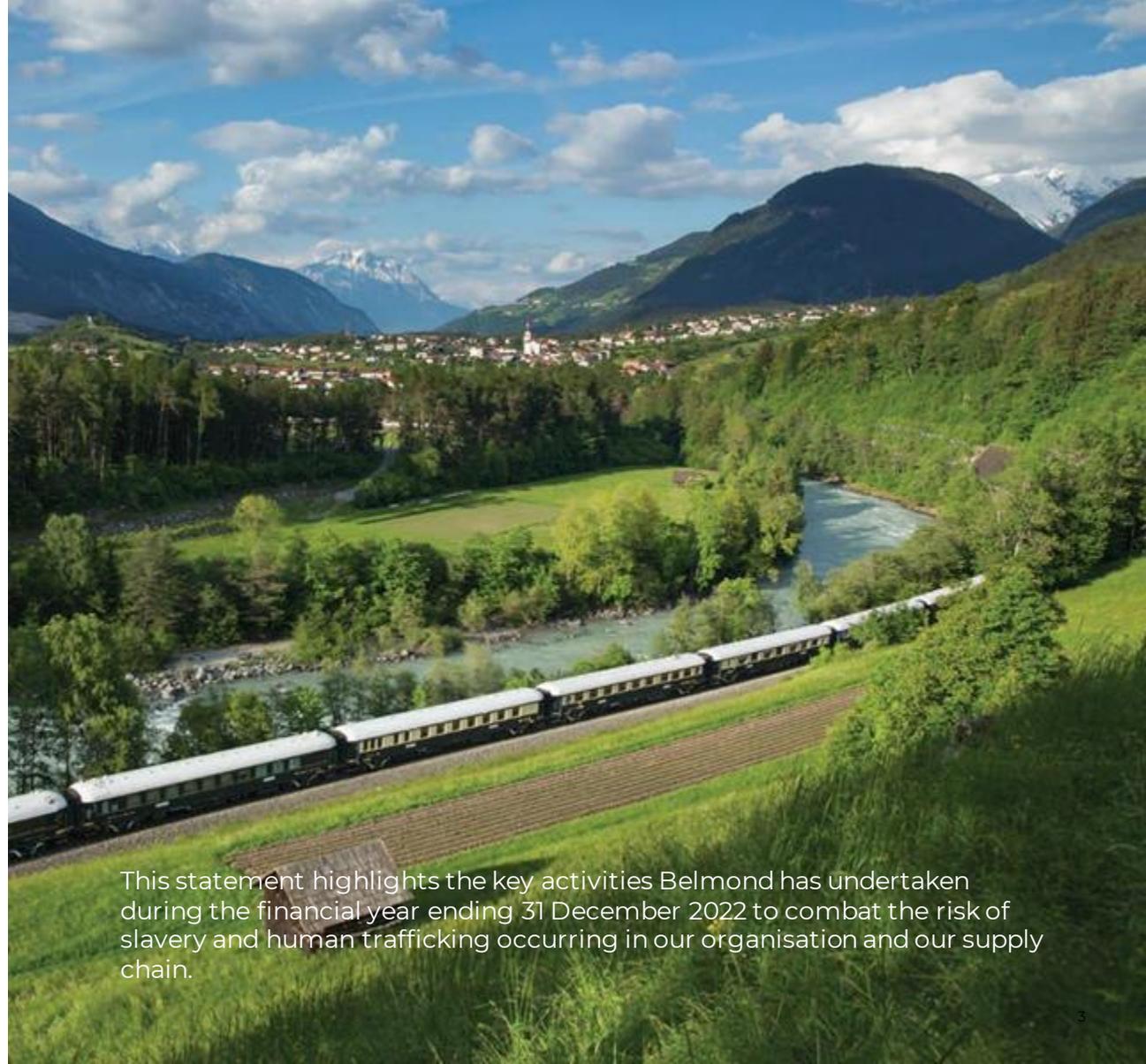
Roeland Vos, President & CEO

# 1. Our commitment

---

At Belmond, we have caring hands and hearts. This means that we respect and take care of each other and the communities we work in. We are committed to pursuing the highest ethical standards, protecting human rights and acting with honesty in everything that we do.

Modern slavery is a horrific crime and one of the greatest human rights issues of our time. We know that forced labour and human trafficking exists in the travel and hospitality sector, and we are committed to developing and implementing a programme designed to address the risks of modern slavery occurring within our own business and supply chains.



This statement highlights the key activities Belmond has undertaken during the financial year ending 31 December 2022 to combat the risk of slavery and human trafficking occurring in our organisation and our supply chain.

## 2. Our business and supply chains

### About Belmond

It all began in 1976, when we received the keys to the legendary Cipriani, a Belmond hotel in Venice. A year later we began collecting the carriages for the Venice Simplon-Orient-Express, which launched in 1982 to whisk intrepid travellers to La Serenissima in style. Belmond joined LVMH Moët Hennessy Louis Vuitton in April 2019, reinforcing our place among the international leaders in the luxury travel sector. Today, Belmond Ltd. and its subsidiaries (Belmond) owns and operates a global collection of exceptional hotel and luxury travel adventures in stunning destinations across the globe. Our collection includes one-of-a-kind hotels, trains, river cruises and safari lodges.



HOTELS



TRAINS



RIVER  
CRUISES



SAFARIS



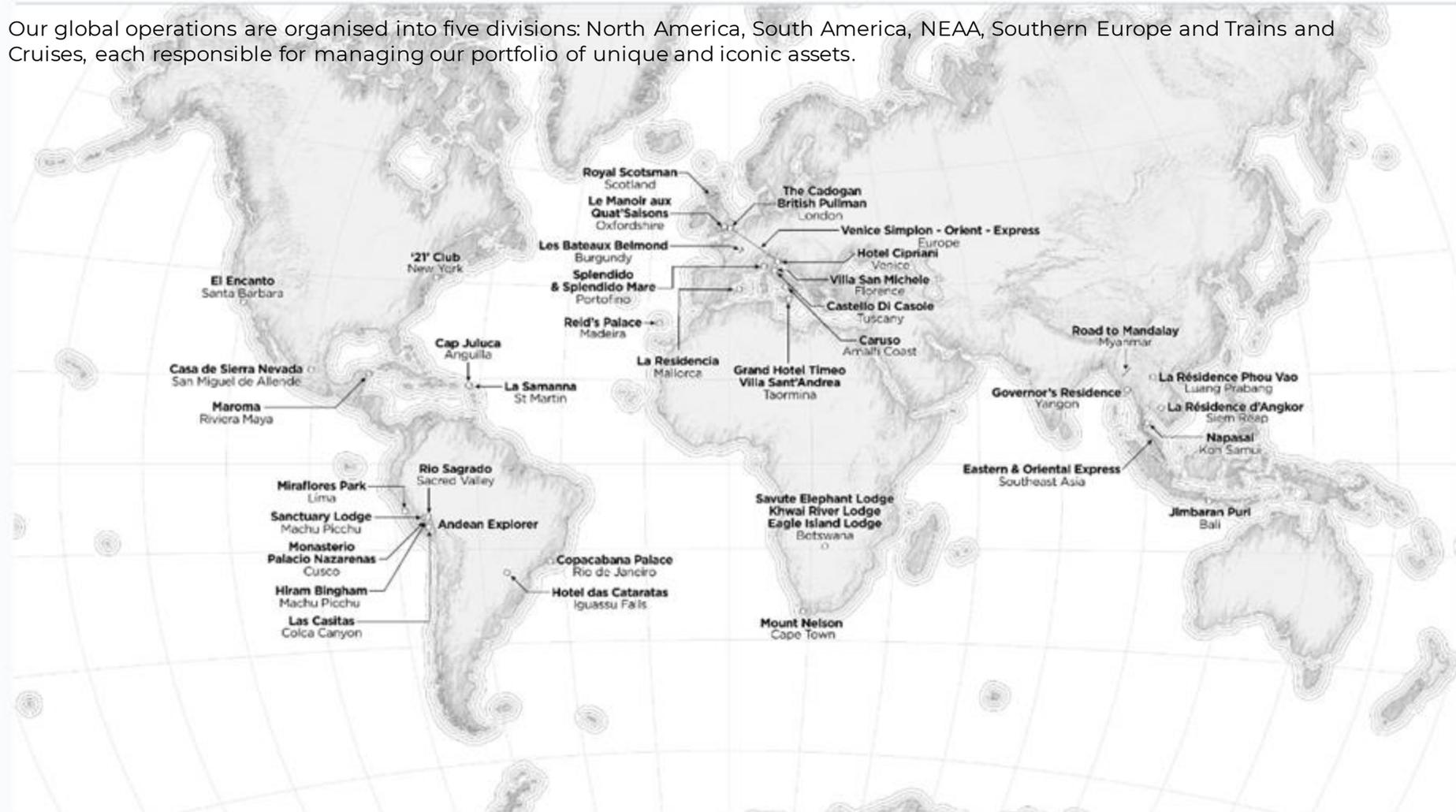
RESTAURANTS

### Our organisational structure

Belmond Ltd.'s A shares are ultimately held by Palladio Overseas Holding Limited, a subsidiary of LVMH Moët Hennessy - Louis Vuitton SE. Belmond Management Limited provides management services in support of group portfolio assets that are located around the world.

## Our locations and operating model

Our global operations are organised into five divisions: North America, South America, NEAA, Southern Europe and Trains and Cruises, each responsible for managing our portfolio of unique and iconic assets.



## Our workforce and supply chain

Belmond directly and indirectly purchases goods, services and labour to support our global operations. Our supply chain can be divided into four broad categories:

### OPERATIONS



Suppliers providing goods and services used in the operation of our hotels, trains, cruises, and safari lodges, including:

- food and beverages;
- uniforms, linen, bathroom amenities and cleaning supplies;
- fixtures and fittings;
- equipment and services;
- repair and maintenance services.

### SUPPORT SERVICES



Suppliers providing support to our business, including:

- brand and marketing;
- professional services and consultancy;
- travel;
- office supplies and facilities management;
- information technology.

### ASSET MANAGEMENT



Suppliers providing support and advisory services to our design, construction and renovation projects.

### TALENT MANAGEMENT

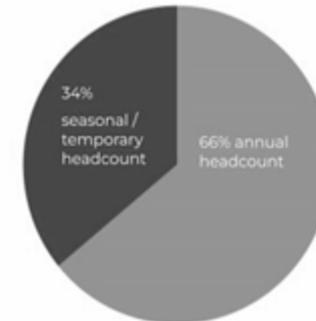


Suppliers providing recruitment and labour outsourcing services to our corporate office and commercial operations.

#### OUR EMPLOYEES - KEY FACTS

**7818**

FTE EMPLOYEES WORLDWIDE



# 3. Our policies and training

## Governance

Our modern slavery initiatives form part of our global ethics and compliance programme. The programme is led by the Ethics and Compliance Committee, which is comprised of senior stakeholders in the business, including the CEO, and meets at least twice per year.

We have several policies in place that are relevant to modern slavery, all of which are approved by senior stakeholders. Our policies are communicated internally via our intranet, and where appropriate, via our external website.

## Belmond Code of Conduct and associated policies

Our Code of Conduct, supported by our suite of compliance policies, is designed to underpin and reinforce our commitment to a corporate culture founded on ethics, integrity, and compliance with the laws of the jurisdictions in which we operate.

Our Code of Conduct is made available to employees upon joining Belmond and sets out our commitment to:

- taking our responsibilities as a corporate citizen seriously;
- always complying with the law;
- only working with third parties who share our values (set out in our Supplier Code of Conduct).

Failure to comply with our Code may result in disciplinary action, up to and including termination of employment.





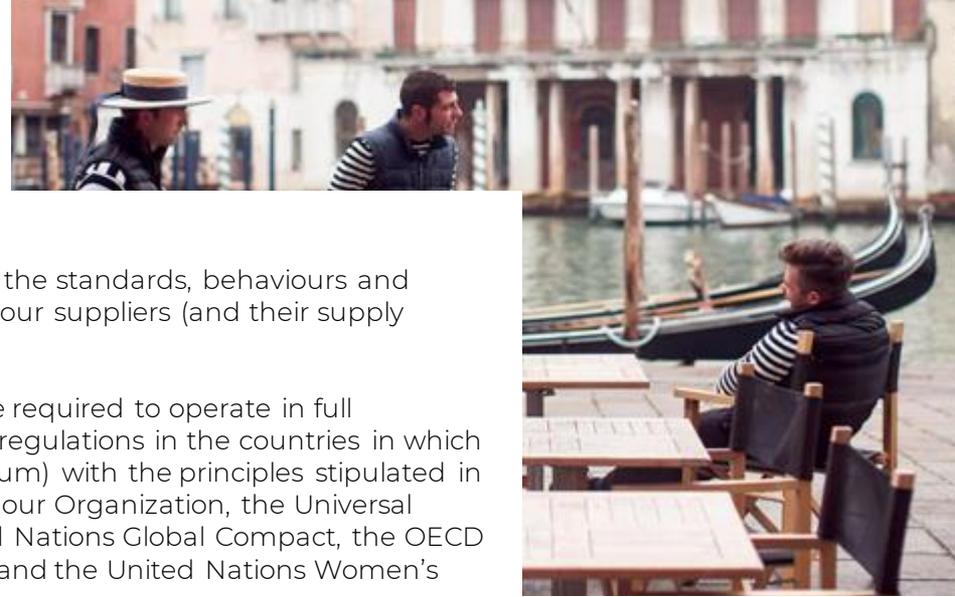
## **Our Supplier Code of Conduct**

Our Supplier Code of Conduct describes the standards, behaviours and practices that Belmond expects from all our suppliers (and their supply chains).

All suppliers (and their supply chains) are required to operate in full compliance with all applicable laws and regulations in the countries in which they operate; and to comply (as a minimum) with the principles stipulated in the Conventions of the International Labour Organization, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Women's Empowerment principles.

Our Supplier Code of Conduct, supported by our standard terms and conditions, sets out our zero-tolerance approach to labour and human rights abuses.

Further details may be found in our Supplier Code of Conduct, a copy of which may be accessed from our website: [here](#).





## Reporting suspicions of slavery and human trafficking

Belmond maintains an open-door policy and encourages our employees and suppliers to share, without fear of retaliation, their questions, concerns, suggestions or complaints, including concerns about modern slavery. Our speak up policy is communicated internally via our intranet, and externally via our website. Suspected instances of modern slavery may be reported directly to the compliance team by emailing [compliance@belmond.com](mailto:compliance@belmond.com). Employees and suppliers may also report concerns to:

- The Belmond Speak Up Line via an independent third-party website [here](#).
- The LVMH Alert Line, an online interface that provides a confidential and secure way of reporting. The LVMH Alert Line may be accessed [here](#).
- All reports made to these lines are fully investigated, with the investigation being overseen by the ethics and compliance team.

## Training and awareness

We have developed a bespoke compliance training module, which is delivered to our employees via our online e-learning platform.

The interactive, gamified training module includes specific training for our employees on how to identify the signs of slavery and human trafficking, and who to contact to raise concerns.

# 4. Due diligence and risk assessment

## Due diligence

We adopt a risk-based approach to due diligence when assessing risks relating to our suppliers and supply chain. We have mandated, where appropriate, that our suppliers be screened against a list of criteria via our third-party risk management software, Exiger.

## Risk assessment

We consider that the following areas give rise to the most significant risks of slavery and human trafficking within the travel and hospitality sector:



### Workforce risks

Workforce risks within the travel and hospitality sector include the presence of:

- hazardous and undesirable work;
- low-skilled work;
- casual work;
- a migrant workforce;
- an outsourced workforce, particularly for temporary and seasonal labour;
- operations in higher-risk jurisdictions for labour exploitation according to the Global Slavery Index.



### Supply chain risks

Global supply chains in the travel and hospitality sector are complex and multi-layered. Goods used and sold pass through multiple tiers and visibility, management and oversight within lower tiers of the supply chain is limited. Supply chain risks within the travel and hospitality sector include the sourcing of:

- fresh produce, such as seafood and meat;
- garments and textiles, such as cotton;
- IT equipment and mobile phones.



### Hotel use risks

Within the travel and hospitality sector, there is a risk that hotels and other venues may be used by those engaged in slavery and human trafficking. Examples include:

- where a domestic worker employed by a private household is working under slavery conditions, and is brought to a venue by the family;
- where hotels are used by individuals engaged in sex trafficking.



# 5. Key performance indicators

We have set KPI's to measure the progress and effectiveness of the anti-slavery initiatives we are undertaking. For 2022-2024, we set four KPI's, each targeted at addressing the salient workforce risks in the travel and hospitality sector.

Progress against 2022-2024 KPI's: To address our awareness and capacity raising KPI, we developed new interactive training and guidance for our colleagues on the procurement of labour via agencies or intermediaries.

In 2023-2024, we will continue to focus on addressing the following KPI's:

## 1. Analyse risks regarding recruitment practices

Analyse our labour recruiters, agents and other intermediaries within our workforce supply chain by category, location and overall spend.



## 2. Training and awareness raising within our labour supply chain

Hold an interactive workshop with our labour agencies to provide training on forced labour, outline our expectations and promote our Supplier Code of Conduct.



## 3. Industry collaboration

Identify opportunities for collaboration with anti-slavery and human trafficking networks within our sector to help further address and mitigate slavery and human trafficking risks.

This statement has been made pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Belmond Management Limited for the financial year ending 31 December 2022.

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



---

Abigail Hunt, General Counsel