



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 2018 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

Throughout the financial year, BML was a subsidiary of Belmond Ltd., which is the parent company of the Belmond corporate group ("Belmond").

Our Business and Supply Chains

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. The Company provides management services in support of group portfolio assets that are located in 24 countries around the world.

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, 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. 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. The standards, behaviours and practices we hold for our suppliers are formalised in our Supplier Code of Conduct.

Belmond Code of Conduct and Training for Officers, Employees and Directors

Our Code of Conduct is applicable to our officers, employees and directors and is available in 10 languages. The Code specifically references our commitment to protecting human rights, including preventing human trafficking, forced labour and the exploitation of children. Failure to comply with the Code may result in disciplinary action, including termination of employment. All of our employees are required to receive on-boarding and annual Code of Conduct training which includes specific training on Modern Slavery and Human Trafficking as well as training in our core values, to ensure that our employees understand, respect and act upon our commitment to our core values and the prevention of Modern Slavery in our business. In addition, we employ hiring procedures and have implemented employment policies to mitigate the risk of Modern Slavery in our business operations. We have also adopted a health and safety policy (under the supervision of a Head of Health Safety Security and Environment) which sets out our commitment and approach to ensuring that we provide a healthy working environment for staff, contractors and suppliers that work on-site.

Belmond Supplier Code of Conduct

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. Our supplier contracts also oblige suppliers to put in place their own written policies in this regard and to obtain the signature of each member of their supply chains confirming its compliance with those policies. A supplier's compliance with our Supplier Code of Conduct is an essential factor in our decision whether to enter into, continue or extend existing business relationships with that supplier and we



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reserve the right to terminate immediately an agreement with any of our suppliers who fail to comply.

Our Supplier Code of Conduct is supported by our contracts policy, which requires our standard supplier contracts, including our Modern Slavery Act provisions, to be used for all suppliers; any exceptions are referred to the Belmond legal department. Our contracts policy, which sets out our internal control and governance procedures with regard to signing contracts, ensures that there is an appropriate level of review and authorisation by senior officers in Belmond before entering into a contract.

Speak Up Policy

To further support our Code of Conduct for our officers, employees and directors and our Supplier Code of Conduct, we provide an ethics hotline that our officers, employees and directors, and suppliers and their workers, and any other third party may use to report suspected violations of law, breaches of the Codes or other abuses, including Modern Slavery, to Belmond for investigation. 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. 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. We will continue to be vigilant and remain committed to improving 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, VP Legal