



Slavery and Human Trafficking Statement

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Introduction

Accor (U.K.) Limited (a company incorporated in England and Wales with company number 01617210) (“Accor UK”) is publishing this statement in compliance with section 54 (1) of the UK Modern Slavery Act 2015. It details the steps taken by the corporate group comprising Accor S.A. (a company incorporated in France with company number 602 036 444) and its worldwide subsidiary undertakings, including Accor UK (“Accor Group”) to assist in the prevention of modern slavery and human trafficking in any part of Accor Group’s business and supply chain during the financial year ending 31 December 2020.

Our business

Accor Group is a world-leading augmented hospitality group offering unique experiences in approximately 5,100 hotels and approximately 5,000 private residences across 110 countries. The Group has been acquiring hospitality expertise for more than 50 years, resulting in an unrivaled portfolio of brands, from luxury to economy, supported by one of the most attractive loyalty programs in the world.

The Accor Group is more than a worldwide leader. The Accor Group is approximately 260,000 hospitality experts placing people at the heart of its business; nurturing a real passion for service and achievement beyond limits. It takes care of guests in more than 110 countries worldwide every day.

The ecosystem that the Accor Group has built up in recent years is reflected in a business model that intimately links value-creation mechanisms with multiple partners, hotel operators, non-hotel players and business, making them essential stakeholders.

As an asset-light group, the Accor Group uses hotel assets, maximizing the income for their owners. To this end, it offers a portfolio of 40 hotel brands in addition to a broad range of services developed to elevate the guest experience (concierge service, shows, restaurants, culinary activities, sports events, and many more), and to diversify its offering into other spheres like coworking or private home rental.

The Accor Group offers an organisation and brand portfolio designed to deliver augmented hospitality. Augmented hospitality means anticipating a customer’s every need. Whether in organizing upscale events, delivering personalized services, creating unique experiences or offering digital solutions, the Accor Group’s aim is to open new pathways in travel and the discovery of new ways to live and work thanks to activities forming the categories “Live,” “Work,” and “Play.”



These three areas of development are rounded out by an entity known as Business Accelerators intended for its real estate and business partners, resulting in the following new brand architecture:

Live, with the Group's 40 hotel brands, and a determination to have hotels that do not confine their focus on the stays of guests, but which also strive to cater to the daily needs of local communities;

Work, bringing the Group's coworking offers center stage; currently in the expansion phase with Wojo Corners;

Play, with the many entertainment options offered by the Accor Group through Potel & Chabot, Paris Society and Accor Arena, the thousands of restaurants and bars in its hotels, and its partners PSG, IMG and others ;

Business Accelerators, combining D-Edge, Gekko, ResDiary, VeryChic and other brands, which ramp up the performance and capacities of hotel owners while placing a special focus on guest needs.

Live

Luxury		Premium		Midscale	Economy
RAFFLES	SLS	mantis	ANGSANA	mantra	BreakFree
ORIENT EXPRESS	SO	MGallery	25h Twenty Five Hours Hotel	NOVOTEL	ibis
FAENA	SOFITEL	JK	HYDE	MERCURE	ibis STYLES
BANYAN TREE	THE HOUSE OF ORIGINALS	Art Series	MÖVENPICK	adagio	greet
DELANO	RIXOS	MONDRIAN	GRAND MERCURE	MAMA SHUTTLE	ibis Budget
LEGEND	onefinestay	pullman	PEPPERS	TRIBE	JOE 30C
Fairmont		swissôtel	THE SEBEL		hotelF1

Work

Play

Business accelerators

Work	Play	Distribution	Experience	Operation
WOJO	POTEL & CHABOT	D-EDGE	JOHN PAUL	ADORIA
MAMAWORKS	PARIS SOCIETY	GEKKO		ASTORE
		VERYCHIC		
		ResDiary		

The Accor Group manages and franchises hotels and provides hospitality services in the United Kingdom largely through Accor UK and its subsidiary companies, including Accor HotelServices UK



Limited (a company incorporated in England and Wales with company number 10508910). In addition, the Accor Group provides home rentals through Lifealike Limited (a company incorporated in England and Wales with company number 06554630) and concierge services through Concierge Holding Company Limited (a company incorporated in England and Wales with company number 09709521) which trades as John Paul.

The Accor Group is directly involved in the operation of owned (including leased) and managed hotels while franchise owners and their managers have control over the operations of the franchised estate in accordance with the relevant franchise agreement terms. The Accor Group supply chain consists of suppliers who sell goods and services to owned, managed and franchised hotels who may purchase goods or services from suppliers carefully selected by the Accor Group. The Accor Group hotel owners make independent decisions on procurement including whether to purchase through the Accor Group procurement service or from their own suppliers.

Commitments supported by the Ethics and CSR Charter

The Accor Group is strongly committed to the goal of being a responsible company that shares value, works to obey ethical principles, complies with applicable laws and regulations, and honours the commitments to its various stakeholders. This commitment extends to human rights including modern slavery and trafficking.

Based on the six values of the Accor Group, the Ethics & CSR Charter provides a framework for the Accor Group's commitment to being a responsible corporate citizen.. The Accor Group's commitment to human rights including combatting modern slavery and trafficking is set out in the Ethics & CSR Charter. In this respect, as detailed in the Ethics & CSR Charter, the Accor Group exercises meticulous scrutiny of any suppliers and service providers that may be using the labour of people coerced into working by threat or intimidation. Should this prove to be the case, the Accor Group will implement a corrective action plan with the partner and, if the results are not satisfactory, will sever all relations with that supplier or service provider.

The Ethics & CSR Charter is promoted by the Chairman and Chief Executive Officer of the Accor Group and the Accor Group's managers and hotel general managers have a particular responsibility for promoting the values and commitments defined in it to those working with them, and for overseeing their application and



implementation.

It is the stated purpose of the Ethics and CSR Charter to help all the Accor Group staff members at every echelon of the business, worldwide and without exception, to understand the Accor Group's expectations on ethics and corporate social responsibility by defining fundamental principles illustrated by various examples of situations encountered in our daily work.

The Accor Group compliance program is operated by a network of compliance officers, under the authority of the Chief Compliance Officer (CCO), who reports directly to the Group Chief Legal Officer; and has direct access to the Chairman and Chief Executive Officer of the Group. The network consists of 26 experienced legal experts based in each region where the Accor Group operates, all of whom received special training in early 2017 and receive regular training and updates.

In addition, the Appointment, Compensation and CSR Committee provides oversight for the proper application of the principles of corporate governance and prepares the decisions of the Accor Group Board of Directors regarding social and environmental responsibility.

The Ethics & CSR Charter has been rolled out in all of the countries where the Accor Group is active. It is available on the various Accor Group Intranets and from the Accor Group website (<https://group.accor.com/en/group/our-commitments/accor-ethics-and-compliance>).

Assessing our risk and impact

In 2016, the Accor Group conducted a study of its socio-economic footprint which identified that its operations have a significant socio-economic impact:

- as the largest operator in the hotel industry in the world, in an industry that is particularly labour-intensive and largely local, the Accor Group creates or provides jobs for many people around the world;
- the total direct, indirect and related business generated by the Accor Group in the world economy amounts to approximately €20bn, of which an average of 83% remains in local economies;
- agriculture, an industry that is upstream from the restaurant business, is the third-largest industry impacted by the Accor Group and has the greatest number of employees. Every job



created in an Accor Group hotel creates approximately 0.5 workers in the agriculture industry;

- the socio-economic footprint of the Accor Group means that there is a duty to be responsible across the value chain and in local economies. The business of the Accor Group has a strong leveraging effect through its supply chain and on household consumption made possible by the salaries paid by the Accor Group and its suppliers, and through contributions to public expenses, especially taxes.

The study identified that the Accor Group shares strong common interests with all of its stakeholders: its guests (who are the reason why the Group's business exists and the creators of its revenue), its employees, its communities, and its partners (suppliers and hotel management).

The analysis confirmed that people continue to occupy a central position in the hotel business and this is because the main challenges are quality of service and guest experience, and quality of life at work. The analysis also demonstrated that the Accor Group must address many challenges in the three core aspects of CSR, with a greater emphasis placed on business, societal and environmental concerns including risks in the area of human rights such as modern slavery and human trafficking. This analysis on the importance of the issues also helped to rank the CSR challenges in the Accor Group's Planet 21 Strategy.

Our vision? Action for positive hospitality

Business ethics, human rights and compliance with laws and regulations are key elements of the Ethics & CSR Charter. The Accor Group is committed to increasing awareness of human trafficking and modern slavery at all levels.

The Accor Group tracks its contribution to the United Nations sustainable development goals and follows the principles of the global reporting initiative launched in 2016 and declares its report in accordance with the GRI Standards: Core Option This includes reporting on the Accor Group's contribution to the United Nations sustainable development goal to promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

One of the key elements of the Accor Group compliance program is to provide awareness-raising and training for employees and partners



about the compliance program, which incorporates topics related to ethics, human rights, slavery and human trafficking. In particular the Accor Group procurement teams are trained to take environmental and social issues into account in their activities. In addition, use of the CSR rating platform developed by EcoVadis makes it possible for the Accor Group procurement team to assess CSR performance of *via* a specific questionnaire completed by the supplier. Suppliers are scored on their social responsibility, environmental and ethical performance and on how much control they have over their own supply chain. The Accor Group encourages colleagues to report any instances of potential misconduct or breach of laws, regulations or policies (including via an anonymous online whistleblowing platform that was rolled out in the Accor Group head offices throughout 2018).

External engagement

The Accor Group is engaged with global, regional and local stakeholders to increase awareness of human rights issues – in particular, human trafficking and modern slavery. The numerous partnerships that the Accor Group maintains (e.g. ECPAT, PurProjet, Energy Observer, Community Conservation Fund Africa, The Camp) also support this dialogue policy

The Accor Group became signatories to the United Nations Global Compact in 2003.

The Accor Group has been fighting child sexual exploitation in its hotels since 2001 in partnership with ECPAT International, an international NGO. ECPAT is a global organisation that leads the fight against the crime of child trafficking and sexual exploitation. The Accor Group's partnership with ECPAT and the WATCH (We Act Together for Children) Program are a testament to the Accor Group's commitment to fighting the sexual exploitation of children.

Created by the Accor Group, the WATCH program helps country organisations and hotels to put procedures in place to detect cases of Sexual Exploitation of Children in Travel and Tourism ("SECTT"). The programme involves local training initiatives designed to heighten employee vigilance so that they can identify cases of SECTT more effectively, decide when to contact the authorities, and offer the child alternative life paths (via reintegration projects for example).

It targets different groups including General Managers, team leaders and employees, and it incorporates films, a training module for hotel teams and guideline sheets, available in nine languages. From 2016 to 2019 the Accor Group has had representation on the Board of



Directors of the NGO (TheCode.org) which has a Code of Conduct for protecting children from sexual exploitation in the tourism industry.

In addition, the Accor Group director, Chantale Hoogstoel serves as a member of the United Nations World Tourism Organization's World Tourism Network on Child Protection .

A unique employment model

The Accor Group's business creates and maintains many jobs in more than 110 countries. As of the end of December 2020, there were approximately 266,000 people employed under the Accor Group brands worldwide.

However, a significant percentage of these people do not directly work for the Accor Group but for the business partners, i.e., the owners of managed or franchised hotels, and a variety of service providers.

The number of jobs indirectly supported by the Accor Group is estimated at around 380,000.

Deployment of talent development policies is tailored to each of the three operating structures – owned and leased hotels, managed hotels, and franchised hotels.

The Accor Group exercises its responsibilities as an employer only as concerns its direct employees (Accor Group employees) in its various head offices and in the owned and leased hotels. For these Accor Group employees, the Accor Group's values, management principles and talent development policies are directly applied, along with all of the employee-relations responsibilities inherent to its position as a direct employer.

The Accor Group aims to be an inclusive company and have policies and procedures in place to promote diversity and inclusion. In addition, Accor UK and the other Accor Group UK businesses will not employ anyone who cannot demonstrate their legal right to work in the UK. Checks are carried out on all applicants to ensure the documents that they provide are genuine, and the Accor Group ensure that its managers are provided with the tools and skills to carry out the necessary document checks sympathetically and appropriately. This supports the Accor Group's pledge to never use clandestine, undocumented or any other form of undeclared labour in any host country and to ensure that directives are issued to this effect.

For employees of managed hotels (where employees are paid by the hotel owner), the Accor Group recommendations and policies may be



applied by the Accor Group as hotel manager, subject to contractual commitments and as long as the owner is willing to accept the associated impact on costs and operations.

The Accor Group also strives to share its values and commitments in its communications and day-to-day interactions with franchisees but has a lesser degree of influence over HR practices in properties owned by franchised owners. In particular, the Accor Group Ethics and CSR commitments are shared with prospective franchisees from the very early stages of any arrangement before contracts are signed. A reference to the Ethics & CSR Charter has been systematically included in all new franchise contracts.

The outside workforce, which is in the indirect sphere of influence, also includes temporary workers who support in-house teams during peak periods, as well as sub-contractor employees in such areas as laundry services, housekeeping, landscaping, and call centres.

The management of labour-related and other sub-contracting risks, and the procedures in place to ensure that the Accor Group commitments are shared with suppliers and sub-contractors is fully described in the 2019 Registration Document - Corporate Responsibility Statement which is available on the Accor Group's website (<https://group.accor.com/en/finance>).

Compensation policies

The Accor Group has defined a global compensation strategy that can be adapted to local practices in each country. It is based on five principles:

- consider the performance and potential of each employee;
- offer compensation that is competitive in each market and country;
- ensure that employee compensation is determined fairly;
- encourage employee savings and stock ownership; and
- strengthen employee healthcare coverage and other benefits.



The Accor Group ensures that compensation policies do not discriminate in any way with regard to age, gender, nationality or any other personal criteria. The Accor Group is also committed to compensating every employee in line with market practices, based on global and local job maps prepared for each job track and a common job evaluation method.

Cultivating common ethics to foster best practices

The business and performance of the Accor Group are both closely linked to those of its partners, namely, suppliers and owners of hotels operated under management and franchise contracts. For the Accor Group, exercising its responsibilities implies extending its social, societal and environmental commitments to its partners, ensuring that they comply with ethics and CSR rules and drawing its entire value chain upwards.

Our owners

The Accor Group wants its partner owners to respect the commitments it has made in its Planet 21 program and to comply with its ethics rules through:

- consistent respect for current laws and regulations;
- respect for Human Rights;
- ethical business conduct; and
- compliance with trade rules.

This is why the deployment of ethical and CSR risks management process among partners is part of the Accor Group's Planet 21 commitment program.

Our suppliers and service providers

As detailed in the Accor Group 2020 Registration Document:

- The Accor Group's purchases amounted to approximately €5.2 billion in 2019, including approximately €2.6 billion in purchases from nominated suppliers
- Based in France, the Corporate Procurement Department manages international contracts and coordinates the network



of 20 national Procurement Offices, which employ approximately 200 buyers on five continents.

Contracts are signed at the international or national level, depending on the features of each category. “Standardizable” products and services that meet several countries’ needs are managed globally, while those specific to a particular country are managed by the national Procurement Office.

Purchases are classified as “nominated” if they are sourced by the hotels and head offices from suppliers that have signed a contract with an Accor Group Procurement Department. They are overseen directly by the Accor Group teams, who manage and optimise the contracts and the sourced products or services and control the supply chain by taking care to offer solutions that best fit the needs expressed. Purchases from nominated suppliers are estimated at 50% of the Accor Group’s total purchases.

Purchases are classified as “non-listed” if they are sourced directly by the hotels from suppliers that have not signed a contract with an Accor Group Procurement Department.

A map of ethical and CSR risks was prepared in 2016 from the following criteria: procurement volumes, environmental and social risks from product families, exposure to customer risks, and Accor Group’s influence on the supplier. Product families were classified into three levels: standard, at risk or at high-risk, 48% of the purchase volumes are identified as “at risk” including 17% at high risk.

The Accor Group has developed a risk management process for nominated suppliers manager by the Accor Group Procurement Department, and this process is being deployed. The Accor Group national Procurement Departments are responsible for setting up an audit plan for high-risk supplies for the 2017-2020 period. The Accor Group manage and perform this audit plan with support of the national Procurement Departments and oversees its implementation via a weekly report by the external auditors. At the end of 2020, the rate of progress is summarised as follows:



Indicators	Scope of reporting	2018	2019	2020
Percentage of suppliers who have signed Procurement 21 Charter	All suppliers	92%	93%	96%
Percentage of suppliers that have conducted a self-assessment	"At-risk" and "high-risk" suppliers	37%	54%	60%
Percentage of suppliers that have undergone an external audit	"High-risk" suppliers	26%	51%	60%
Percentage of action plans followed	"At-risk" and "high-risk" suppliers	50%	100% 2019 reports	100%

Training on compliance with this process was launched among buyers. The Accor Group also engage in awareness and education of our leadership team members and conduct risk-based due diligence within its supply chains.

For each of the three risk categories, a supervision and follow up plan was drawn up to define the points to be incorporated at each step of the procurement process: tender, selection of suppliers contracts, evaluation, audit, action plan, and even dereferencing.

Audits and monitoring of the action plan are major points of progress in the current process. Going forward the Accor Group will continue to work with suppliers to communicate and where necessary enforce its policies with respect to ethics and CSR including modern slavery and human trafficking.

A commitment supported by the Accor Group's endowment fund: Solidarity Accor

The corporate responsibility of the Accor Group, its hotels, its employees is expressed through the Accor Solidarity endowment fund. Accor Solidarity aims to fight against the economic and social exclusion of disadvantaged people through vocational activities, by supporting projects together with local organisations and NGOs.

The fund is continuing its commitment in favor of training and professional integration by financing numerous projects and may also increase its support for certain associations to duplicate programs that have proven their worth or finance large-scale initiatives. Also, over the coming years, the Accor Solidarity teams will look for the best ways to support access to sustainable employment for people that have completed training or integration. Accor Solidarity wants to act to improve the effectiveness of the job market access mechanisms designed for people that have completed their integration sessions.

For more than 10 years, Accor Solidarity has been increasing its upstream response to emergency situations and providing its



assistance to local populations to help deal with the immediate and long-term consequences of natural disasters. Since 2018, the fund has extended its support to projects that respond to other types of humanitarian crises, especially in major cities. Whether they concern extreme poverty, isolation or the conditions for supporting the most disadvantaged populations, they still must deal with the same problems as humanitarian emergencies, which generate economic and social exclusion.

An ongoing commitment

Looking ahead the Accor Group will further develop its existing efforts to prevent human rights abuses and to combat modern slavery and human trafficking across its own operations and those of its partners. The Accor Group's commitment to addressing human rights issues, including modern slavery and human trafficking is a central part of its Ethics & CSR Charter. As an industry leader, the Accor Group believes in inspiring and encouraging as many as possible to follow its lead – employees, customers, partners and local communities.

The Accor (U.K.) Limited Board of Directors approved this statement on 8 December 2021.

Saro Seropyan

Director