

Modern Slavery Statement 2025

Virgin Hotels Collection

Introduction

This statement has been published in accordance with Section 54 of the UK Modern Slavery Act 2015. It sets out the steps taken by Virgin Hotels Collection (VHC), for the financial year ending 31 December 2025, to prevent modern slavery and human trafficking in its own business operations and supply chains.

VHC comprises Virgin Limited Edition (VLE) and Virgin Hotels (VH), all hereafter referred to as “VHC,” “we,” and “our.” VHC operates through a mixed business model that includes managing and owning hotels and providing hospitality services.

VHC’s purpose is ‘Everyone Leaves Feeling Better’ and is dedicated to responsible business practices and good governance. We aim to conduct our operations ethically, lawfully, and safely and are committed to respecting the human rights of the communities in which we operate. We expect our partners and suppliers to adhere to the same standards and uphold these rights in their own supply chains. VHC is committed to eliminating modern slavery and human trafficking in all its forms within our business and value chains.

We are committed to transparency in our approach and recognise that identifying and openly addressing risks is a critical part of strengthening our response to modern slavery across VHC.

Key Focuses

In 2025, we strengthened our understanding of key modern slavery risk areas and introduced these risks to senior management teams at our hotels through training and embedding it into onboarding inductions.

Organisation structure and supply chains

VHC operates 17 hospitality properties across eight countries, with headquarters in London and Miami.

VHC operates in the USA, the British Virgin Islands, the UK, Switzerland, Spain, Morocco, South Africa and Kenya.

Our supply chains encompass hotel operations, construction, and community partnerships. They include both direct suppliers and third-party service providers, including outsourced services such as cleaning, security, and construction. In some regions, labour may be sourced through agencies or intermediaries, which can present increased risks if not appropriately managed. We prioritise local sourcing to support entrepreneurship and economic resilience in our communities. While this supports local economies, we recognise that certain supply chain activities, including outsourced services and construction, may present increased risks of labour exploitation if not carefully managed.

Modern slavery oversight is shared across Operations, Purchasing, People, Finance, and Legal departments, with ultimate accountability resting with the Chief People Officer. These roles are responsible for overseeing implementation, monitoring risks, and escalating key issues relating to modern slavery across the business. Key contacts include:



- Chief Operating Officer
- Global Head of Sustainability
- Vice President of Operations- Americas

Policies on Modern Slavery and Human Trafficking

VHC is committed to eliminating modern slavery and human trafficking in all its forms within our business and value chains. We have numerous policies and procedures that ensure our hiring and operational practices mirror our commitment to zero tolerance for modern slavery in our supply chain. These include:

- Whistleblowing and grievance mechanisms

These mechanisms provide safe channels for employees and third parties to raise concerns about suspected exploitation, poor labour practices, or unethical behaviour, enabling issues to be identified and addressed promptly.

- Responsible recruitment and onboarding procedures

These procedures help reduce the risk of forced labour by promoting fair hiring practices, verifying the right to work, using responsible recruitment channels, and ensuring workers understand their terms of employment.

- Anti-bribery and anti-corruption policies

These policies support modern slavery management by helping prevent unethical practices, concealment of labour abuses, and improper influence in recruitment, procurement, and supplier relationships.

- Data protection and GDPR compliance

These requirements help ensure that personal information relating to employees, workers, and grievance reports is handled securely and appropriately, supporting confidential reporting and responsible case management.

Due diligence processes

Our due diligence approach varies across our brands to reflect different operating models and risk profiles.

VH

The VH properties are all in urban environments in primary and secondary cities in the US and UK. VH utilises a central procurement provider to source key operational equipment, which provides standardisation around the Virgin Hotels group. To support our staff in reporting any modern slavery concerns, we have a dedicated ethical hotline for our VH employees. Reports are initially reviewed by an independent third party. Cases are then escalated to the Chief People Officer, who determines next steps and, where appropriate, escalates to the CEO and wider executive team.

VLE

The VLE properties are typically smaller and located in more rural locations. At each property, we aim to work with local suppliers and have established relationships to visit suppliers' premises, meet staff and conduct checks. Supplier assessments are conducted throughout the year, the frequency is tailored by each property based on geographic ease.

VLE actively employs from within the local community; therefore, our staff are positioned to hear firsthand any possible concerns with suppliers. Our General Managers encourage their employees to alert them of any issues that could affect the business. Yet we understand that there is greater work to do to educate and empower staff to come forward with these potential supply chain risks. However, this will remain a focus area for the coming year.

In 2025, the ethical hotline was expanded to VLE properties.

VHC

Where potential cases of modern slavery or labour exploitation are identified, VHC is committed to taking a responsible and victim-centred approach. This includes working with relevant partners to safeguard affected individuals, investigating concerns thoroughly, and implementing corrective actions with suppliers where appropriate.

Training and Awareness

As with our due diligence process, our training is tailored across our brands to reflect different operating environments. This allows us to target our employees in ways that will have the greatest impact.

We monitor the effectiveness of our modern slavery approach through key indicators, including training completion rates, supplier engagement activities, use of our ethical reporting channels, and ongoing risk assessments. These metrics support continuous improvement and inform our annual priorities.

VLE

In 2025, 85% of senior managers and support office employees around the group undertook modern slavery training. The online module was available in English, Spanish, and French to support training uptake. This training introduces modern slavery in a global context, highlights signs of how to identify it and uses case scenarios to test employees.

VH

At VH, essential modern slavery training is managed by the on-property People teams, overseen by the VP of Operations and the Chief People Officer. Furthermore, we are aware

of the risk associated with hotels in urban areas, and we work with local police forces to instigate awareness and training opportunities.

In 2025, representatives from the local Metropolitan Police visited Virgin Hotels Shoreditch to deliver modern slavery awareness training to on-property teams. The session strengthened colleagues' ability to identify indicators of exploitation in an urban hotel environment and reinforced escalation pathways through internal and external reporting channels.

VHC

VHC's Global Head of Sustainability took part in a panel discussion hosted by the wider Virgin Group to discuss modern slavery risks across industries. The session highlighted key challenges in hospitality and reinforced the importance of training, supplier oversight, and partnerships with local authorities.

We recognise the importance of collaboration in addressing modern slavery risks. We will continue to explore opportunities to work with industry bodies and external partners to improve our response.

Responsible recruitment

Although different legal requirements apply in our different territories, our responsible recruitment procedures include comprehensive pre-employment checks, ensuring a fair interview process for all applicants, providing necessary adjustments, and using trusted and responsible agencies and recruitment boards. These measures help reduce the risk of exploitation by promoting fair and transparent recruitment practices across our operations.

Priorities for the future

Looking ahead to 2026, we plan to continue to create a stronger foundation for establishing modern slavery awareness and highlighting where our risks lie.

These priorities include:

- Circulating our online modern slavery training around all of our employees, in all departments, across VLE. To accommodate this training, material will be created to contextualise the individual modern slavery risks per country.
- Establish a supplier visit KPI around VLE.
- Conducting a gap analysis between this statement and the updated 2025 TISC guidance on Modern Slavery reporting
- Continue to participate in collaboration events, including modern slavery initiatives hosted by the Virgin Group.

Authorised by

This statement

was approved by the Board of VHC OPCO LIMITED.

Signed by



Date: 13.07.26

Position: Chief Executive Officer