

Modern Slavery Act Transparency Statement

March 2018



Redefine Hotel Management Limited is committed to ensuring acts of modern slavery, human trafficking, child and sexual exploitation do not occur in its business or within its supply chain. The Company acknowledges the provisions of the Modern Slavery Act 2015 and commits to complying with its obligations to ensure transparency within its business and its suppliers of goods and services.

Redefine Hotel Management Limited owns a number of hotels located across the UK and engages Redefine|BDL Hotels ('RBH') to manage its portfolio of hotels. Within the provision of accommodation, conference and events and food and beverage services, Redefine Hotel Management Limited employs up to 142 staff directly and has relationships with external businesses to support the running of the hotels in the following way:

- Arrangements for the supply of goods and services (some by contractors) to the hotels;
- Arrangements for the supply of agency workers to support the hotels staffing requirements;
- Arrangement with RBH to manage the hotel properties on behalf of Redefine Hotel Management Limited;

The above make up the supply chain of Redefine Hotel Management Limited's hotel portfolio.

As part of the companies due diligence process, and in conjunction with/via RBH, Redefine Hotel Management Limited's has:

- Reviewed the previously identified areas within the hotel business and supply chain that may be at risk of modern slavery, human trafficking, child and sexual exploitation occurring and concluded/ensured there has been no change in areas of risk;
- Continued a process where existing contracts for service/supply within the RBH supply chain includes terms guaranteeing slavery, human trafficking, child and sexual exploitation does not occur within their business, and incorporated provisions to review/audit those suppliers where necessary;
- Ensured that any new or renewed procurement contracts or tenders for service/supply within the RBH supply chain includes terms guaranteeing slavery, human trafficking, child and sexual exploitation does not occur within their business, and incorporated provisions to review/audit those suppliers where necessary;
- Adopted the RBH policy detailing zero tolerance on those activities occurring in its business and/or supply chain;
- Continued training and educating our employees via the RBH online learning platform on the potential risks, and how to deal with them (if they were to arise) as a way of limiting and preventing those risks from occurring;
- Ensured that the training knowledge is embedded into the hotels by supporting the introduction of monthly targets of completion and the online learning platform automatically requiring employees to refresh their learning on this topic every 2 years.

Redefine Hotel Management Limited's will not support or deal with any business knowingly involved in slavery, human trafficking, child or sexual exploitation.

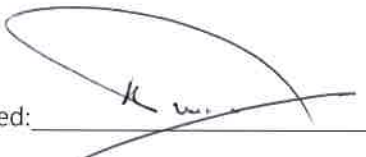


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March 2018



This statement will be reviewed annually and published on the Redefine Hotel Management Limited's and RBH website.

Signed:  Date: 21/03/18
Title: CEO



Modern Slavery Act Transparency Statement

March 2018



RBH Hotel Management Ltd is committed to ensuring acts of modern slavery, human trafficking, child and sexual exploitation do not occur in its business or within its supply chain. The Company acknowledges the provisions of the Modern Slavery Act 2015 and commits to complying with its obligations to ensure transparency within its business and its suppliers of goods and services.

RBH Hotel Management Ltd owns a number of hotels located across the UK and engages RBH Hotels UK Ltd ('RBH') to manage its portfolio of hotels. Within the provision of accommodation, conference and events and food and beverage services, RBH Hotel Management Ltd employs up to 142 staff directly and has relationships with external businesses to support the running of the hotels in the following way:

- Arrangements for the supply of goods and services (some by contractors) to the hotels;
- Arrangements for the supply of agency workers to support the hotels staffing requirements;
- Arrangement with RBH to manage the hotel properties on behalf of RBH Hotel Management Ltd;

The above make up the supply chain of RBH Hotel Management Ltd's hotel portfolio.

As part of the companies due diligence process, and in conjunction with/via RBH, RBH Hotel Management Ltd's has:

- Reviewed the previously identified areas within the hotel business and supply chain that may be at risk of modern slavery, human trafficking, child and sexual exploitation occurring and concluded/ensured there has been no change in areas of risk;
- Continued a process where existing contracts for service/supply within the RBH supply chain includes terms guaranteeing slavery, human trafficking, child and sexual exploitation does not occur within their business, and incorporated provisions to review/audit those suppliers where necessary;
- Ensured that any new or renewed procurement contracts or tenders for service/supply within the RBH supply chain includes terms guaranteeing slavery, human trafficking, child and sexual exploitation does not occur within their business, and incorporated provisions to review/audit those suppliers where necessary;
- Adopted the RBH policy detailing zero tolerance on those activities occurring in its business and/or supply chain;
- Continued training and educating our employees via the RBH online learning platform on the potential risks, and how to deal with them (if they were to arise) as a way of limiting and preventing those risks from occurring;
- Ensured that the training knowledge is embedded into the hotels by supporting the introduction of monthly targets of completion and the online learning platform automatically requiring employees to refresh their learning on this topic every 2 years.

RBH Hotel Management Ltd's will not support or deal with any business knowingly involved in slavery, human trafficking, child or sexual exploitation.

This statement will be reviewed annually and published on the RBH Hotel Management Ltd's and RBH website.

Signed: _____

Date: _____

21/03/18

Title: _____

CEO