

MODERN SLAVERY ACT STATEMENT

A. Our business and supply chains

This statement is made on behalf of **HPI UK Holding Ltd trading as Rosewood London** ("The Hotel").

HPI UK Holding Ltd is the ownership company of Rosewood London which is a luxury hotel in central London, England. The hotel is managed by Rosewood Hotel Group on behalf of HPI UK Holding Ltd.

Rosewood Hotel Group is an international luxury hotel and resort company currently operating 19 properties in 11 countries, owned by Hong Kong-based New World Development.

The Hotel has over 500 employees in the UK. The Hotel had an annual turnover in 2016 of £44.5 million.

The Hotel is based at one site, in central London, United Kingdom. The Hotel provides full hotel services including bedrooms, spa and leisure facilities with significant food and beverage offerings.

Our supply chains include purchases of food and beverages as well as operating supplies and services for all areas of our business. The majority of supply of goods and services is from UK-based companies.

This statement is made on behalf of HPI only pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HPI's slavery and human trafficking statement for the financial year ending 31st December 2018.

B. Our commitment

The Hotel is committed to ensuring that it conducts its business ethically and with integrity. The Hotel does not use slave labour anywhere in its own business, nor does The Hotel tolerate forced or compulsory labour or human trafficking. The Hotel is committed to ensuring that no such behaviour takes place in connection with the company.

This commitment extends to The Hotel's supply chain. The Hotel's supplier relationships are based on lawful, efficient and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. The Hotel will not knowingly use any supplier that uses forced, prison, or indentured labour. The Hotel will only work with suppliers who comply with all laws regarding slavery and human trafficking in the countries in which the suppliers are doing business.

C. Our policy

We take a risk-based approach to performing due diligence on our suppliers, which includes especially reviewing suppliers doing business in high-risk countries or offering high-risk products or services. Based upon this risk, certain suppliers will be completing a Modern Slavery Survey in the 1st quarter of 2018 and we will conduct ongoing due diligence on certain of our existing and prospective suppliers. To the extent that if a supplier does not meet our due diligence requirements or our standards for ethical conduct, we will not do business with that supplier.



The organisation uses only specified, reputable employment agencies to source agency labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

D. Risks

In order to identify and address risks of Modern Slavery in our supply chain we will:

- Carry out a first tier risk supplier mapping exercise in order to identify suppliers that fall within an area that is at high risk of Modern Slavery, and address Modern Slavery with these suppliers by requesting copies of their policies and procedures together with a survey.
- Address Modern Slavery as a formal business risk that will be reviewed at quarterly meetings and owned by Executives within the business.
- Review our procurement processes to identify Modern Slavery as a risk to be identified and assessed on supplier audits.
- Ensured our Right to Work policy is followed with strict compliance.

E. Conducting business

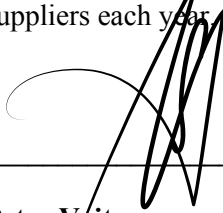
The Hotel implements the above policies and the commitment set out in this statement by requiring all of its suppliers to certify that they are compliant with the terms of the same as well as incorporating such compliance in the terms of our purchase orders. Further, The Hotel contractually obliges its suppliers to comply with all applicable laws and to adopt compliant working practices, including not utilising any form of compulsory labour or human trafficking. The Hotel's suppliers are obliged to pass these requirements on to their own suppliers as well, and The Hotel expects all of its suppliers to police their own supply chains in order to root out modern slavery of any kind. Suppliers that fail to meet the contractual requirements set forth above will be no longer be used.

In addition, key personnel in The Hotel's procurement department receive training on how to identify human trafficking and forced labour issues.


The Hotel encourages anyone with information regarding modern slavery or human trafficking taking place at the company or anywhere in its supply chain to make a report directly to the company's Managing Director.

F. Tracking and monitoring

We intend to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains by surveying at least 25% of our suppliers each year.



Peter Voit
Director – HPI UK Holding Ltd



Michael Bonsor
Managing Director – Rosewood London

