



**MODERN SLAVERY AND HUMAN  
TRAFFICKING STATEMENT - 2022**

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## OVERVIEW

**Issued By:** Senior Director – Risk & Compliance, Group Director - HR

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**Approved By:** The Board Committee

**Version:**

Modern slavery—including human trafficking, forced, bonded or compulsory labour and slavery—represents some of the gravest forms of human rights abuses. We recognize that the global nature of our business may expose us to the risk of modern slavery and human trafficking (MSHT) in our operations, supply chain and client relationships and we are committed to identifying and mitigating these risks. As part of our company wide initiative focused on enabling people to live and work well, we recognize our responsibility to respect the human rights of every worker supplying goods or services to us, every team member helping us deliver great service to our customers, and the guests that we serve every day.

Initiatives and endeavors to prohibit Modern Slavery and Human Trafficking is an ongoing process and this is a commitment and progress statement on the steps taken by FIVE.

FIVE recognizes that there are several ways in which its business could be affected by modern slavery. The fundamental areas of risk and the accountabilities for managing them are identified through key sources viz. Employees, Third-party contracted employees (Casual staff) Supply Chain (Suppliers) and our Guests.

Following measures are undertaken by FIVE for the purpose of prohibition and minimizing the risk of modern slavery, human trafficking and forced labour through our value chain –

- **GOVERNANCE:**

At the Board level, the Sustainability Committee and the Audit and Risk Committee oversee any key human rights risks which may exist through the value chain. FIVE is committed to ensure adherence to the Human Rights policy which advocates principles and commitment statements by implementation of measures in the overall framework.

- **CODE OF CONDUCT:**

FIVE has implemented a Code of Conduct for its employees. In its endeavor to strictly prohibit any form of human trafficking, the company has implemented policies and procedures in place. FIVE obtains acknowledgement from the employees at the time of joining to ensure their understanding of the policies and commitment on its adherence.

- **EMPLOYEE TRAININGS:**

Recognizing the risk that our hotels could be used as locations for trafficked individuals to be harbored or exploited, we have taken steps to empower our team members to respond in the right way if they suspect that something is not quite right. As a part of our Code of Conduct trainings held in periodic townhall sessions, FIVE trains its employees on the importance of protection of human rights, prohibition of any form of child labour, forced labour or modern slavery and the prevention of human trafficking, child sex tourism or forced adult sex tourism. Employees are further informed to be aware and conscious if they encounter any such instances and reporting these instances through the formal reporting channels. FIVE has implemented a helpline number, guest services (emergency number) and an email ID where any such instances can be reported.

- **SUPPLIER STANDARDS:**

To implement a robust framework through its supply chain, FIVE has prepared a supplier code of conduct which comprises all clauses to be considered to maintain high standards of labour working

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conditions, environmental standards, code of ethics, adherence to human rights, non-employment of child or forced labour, etc. FIVE obtains a commitment from the suppliers at the time of onboarding on their understanding and adherence to standards laid out in the Supplier Code of Conduct. Specifically, about modern slavery, it states that there will be:

- No trafficked individuals working in any part of the supply chain
- No forced, bonded, indentured, or involuntary prison labour or any other labour of a similar conduct in any part of our supply chain
- No payment of recruitment fees on behalf of migrant workers
- Support and respect the protection of human rights in accordance with the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights, and ensure that they are not complicit in any human rights abuses
- Take all possible steps to ensure that human trafficking, the use of all forms of forced or compulsory labour and any other form of modern slavery are not taking place in any of their supply chains or their own operations, recognizing the role of principle 4 of the United Nations Global Compact (UNGC)
- Recognize and respect the rights of employees to associate freely and to organize and bargain collectively in accordance with the local laws in the countries in which they are employed, recognizing the role of principle 3 of the UNGC principles
- Do not use child labour and support effective abolition of child labour, and take all reasonable steps to eliminate such labour from their supply chain recognizing the role of principle 5 of the UNGC principles

As a part of onboarding and contracting with new vendors, the purchasing team performs a pre-qualification assessment to understand the sourcing practices of the vendors in line with FIVE's Sustainable Procurement Policy.

As a part of our supplier standards, we have incorporated clauses to incorporate that in case of any deviation/ major non-compliance noted to the standards, FIVE reserves the right to cease business with such suppliers.

- **COMPLAINT CHANNEL:**

FIVE aims to create workplaces in which open and honest communications among all colleagues are valued and respected. Employees, workers, or any supply chain team members have access to grievance reporting mechanisms and may report without prejudice, with anonymity respected. If any employee, worker members faces any conflict or issues which endangers their human rights or violates any existing guidelines related to harassment, bullying, abuse, or discrimination, or witnesses/ encounters any instance of modern slavery, trafficking or child labour, then they may report the Complaint(s)/Concern(s) to his immediate Supervisor or Line Manager, any members of Discrimination Committee or the Ethics and Compliance Committee, or through the hotline number or available registered email ID of –

Ethics and Compliance Email ID: [ethics@fiveglobalholdings.com](mailto:ethics@fiveglobalholdings.com);  
Ethics Helpline Contact Number: +971-42475270

Supply chain team members may inform the Purchasing Manager, Sustainability Director or the respective company SPOC for any grievances or issues noted, else they may use the above reporting channels for the purpose of supply chain adherence

During Code of Conduct trainings and supplier audits performed, FIVE personnel provide details on the above reporting channels to all to report any form of incidents.

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- **SUPPLIER DUE DILIGENCE:**

FIVE performs supplier due diligence through supplier audits and risk assessments for its suppliers covering 80% of its total purchases. For this purpose, FIVE has designed a robust checklist covering aspects on labour health and working conditions, code of ethics and health and safety. These include aspects on child labour, forced labour, prevention of child sex tourism and forced adult sex tourism, and understanding from the suppliers on the measures taken for prevention of any form of modern slavery or trafficking in their business.

As a part of supplier audits and due diligence conducted for 2023, we did not observe any anomalies from the aspect of Modern Slavery and Human Trafficking for the sample audits performed. Our suppliers, majorly traders were requested information on their human rights policies and related measures in place. We obtained documentation, performed on-site audits (for sample employees) and noted no instance of child labour or forced labour through site visit and sample interviews conducted.

- **PREVENTION OF CHILD SEX TOURISM AND FORCED ADULT SEX TOURISM:**

FIVE takes the potential issue of child or adult exploitation very seriously. We recognize that there is a risk in all hospitality companies that hotels might be used for the sexual exploitation of adults or children, or the harboring / movement of adults and children for the use of forced labour. Whilst we recognize that this is a risk which we cannot always directly control, there are some actions we can take to make sure that our own team members are properly trained to spot the signs of exploitation and empowered to act on any suspicions quickly and effectively. As a part of our Code of Conduct training townhalls, we have provided information and trainings to our employees to raise awareness on these topics and utilize the right reporting channels in case they encounter any incidents.

To implement measures for prevention of any such acts, FIVE has implemented a comprehensive policy on prevention of child sex tourism and forced adult sex tourism and taken measures to collaborate with agencies and international organizations for the prevention of such activities.

- **PREVENTION OF MSHT WITHIN GUESTS:**

As part of our existing policies, we have provided information and trainings to our employees to raise awareness on being conscious of any such instances which they may encounter among guests in the facilities and to provide proper screening and guidance if they are suspicious of any such cases.

Customer awareness initiatives are taken by FIVE in form of awareness flyers and IPTV awareness posters to be aware of such cases and the local authorities that they may report to in such cases.

No cases of modern slavery or human trafficking have been identified for guests as on date.

## **FUTURE TARGETS AND ACTION PLANS**

Through internal and external engagement, we are continuing to work to enhance our impact. During the next two years, we intend to do the following –

- Enhance our internal processes to identify, track and monitor allegations of human rights violations
- Continued to require assessments of potential adverse human rights impacts in our supply chain, our operational and under-construction facilities
- Continue to work collaboratively with international organizations to develop human rights-related legal clauses and to participate in other appropriate industry initiatives

## **CONCLUSION**

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We recognize that managing risk of modern slavery and human trafficking is complex and we value the positive impact that collaboration and partnerships can have in tackling these issues, both across our supply chain, our employees, third-party contractors, guests and with other stakeholder groups. By collaborating with our network of suppliers, we gain a comprehensive understanding of how our Policy is implemented. We constantly enhance and refine our strategy by learning from our experiences in complying with and rectifying any non-compliance issues. We will maintain and strengthen our positive relationships with our suppliers and our other stakeholder groups to bring about significant improvements.

If you have any suggestions or concerns regarding this document, feel free to reach out to the Risk and Compliance or Human Resources team.