

Modern Slavery Policy

1. Introduction

1.1 This policy is prepared for the purpose of Section 54(1) of the Modern Slavery Act 2015 and forms our slavery and human trafficking policy. We are committed to acting ethically and with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of slavery and human trafficking within the business or supply chain.

2. Statement

2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, agents, contractors, and suppliers.

2.2 The Company strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain. We consider ourselves to be a low to medium risk business, and are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will uphold the same high standards.

3. Definition

3.1 Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

4. Commitments

4.1 We have a zero-tolerance approach to modern slavery in our organisation and in our supply chains. As a company we expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

(a) The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf.

(b) Employees must not engage in or facilitate any activity that might lead to, or suggest, a breach of this policy

(c) Employees must report any potential breach of this policy as soon as practicable

4.2. We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. If we find that other individuals or organisations working on our behalf have breached this policy, we will

ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

4.3 In accordance with our commitment to acting ethically and with integrity in all our business relationships, we intend to implement effective systems and controls to ensure Modern Slavery is not taking place in our supply chains. This will involve ensuring the effective communication and reinforcement of relevant policies, which give a clear view of the values and principles that underpin all our work and that we expect all persons involved in our business and supply chain to adhere to.

5. Recruitment

5.1 Appropriate checks in accordance with relevant laws are carried out on all our prospective employees and our HR team works closely with the local hotel teams to ensure that pay and conditions are appropriately managed.

6. Communication and Awareness of Policy

6.1 Training on this policy and on the risk our business faces from modern slavery in its supply chain will be provided where needed.

7. Breach of Policy

7.1 Any team member, supplier or partner – at any level – found to have breached this policy will face disciplinary action, which could result in dismissal or termination for misconduct or gross misconduct.