

-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT-

INTRODUCTION

This statement sets out Kew Green Hotel's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the hospitality industry, Kew Green Hotels recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Kew Green Hotels are committed to ensuring we have effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.

OUR BUSINESS AND SUPPLY CHAIN

We are one of the UK's leading hotel management companies with over 50 UK and international hotels in our portfolio. We work across the spectrum of hotel operations, from limited service through to luxury full service, owning and developing our own hotels, as well as managing assets on behalf of others. We employ over 1500 colleagues across our Company who work across our hotels and within our central Commercial Hub and Head Office.

Our supply chain activities are managed centrally with hotels utilising Group contracts with national suppliers/contractors and sometimes relying on some local providers for tactical purchases.

Kew Green Hotels Procurement provides services for our head office, central hub and hotels. This is focused on categories such as:

- Technology
- Professional Services
- Food & Beverage
- Linen
- Cleaning Supplies
- Maintenance & Repair
- Utilities
- Furniture

HIGH RISK AREAS

Following a risk assessment, the Company has identified the following areas to be of higher risk of slavery or human trafficking:

- Our hotels - As a hotel operator we recognise that our services could be utilised to exploit vulnerable adults and children. This could be by moving them through the hotel or holding them against their will within bedroom accommodation for the purpose of sexual exploitation.
- Agency Usage - Some of our properties will require agency resources from time to time to support the operation, particularly during busy trading periods, for example Christmas. With a geographic spread, we use a number of employment agencies/ outsource services, making it more difficult to constantly monitor their recruitment practices.
- Goods and Services - With products and services sourced from around the world there is a possibility that unethical working practice, including poor working conditions, welfare and pay, may exist within some aspects of the supply chain; particularly during the manufacturing process.

RESPONSIBILITY

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The responsibility for the updating and creation of policies within Kew Green lies with the relevant director and/ or People Team. They are responsible for putting policies in place and reviewing policies on a regular basis.
- **Risk assessments:** We work with an external third party to ensure that all our risk assessments remain up to date and cover the needs of our colleagues, customers and suppliers. The external company we use to support us is Sustainable Safety Group (SSG); our risk assessments are available at any of our properties or offices.
- **Investigations/due diligence:** The Director of HR, Procurement Director, Area General Managers and Health and Safety representatives are all responsible for ensuring that due diligence is completed. All of colleagues are responsible for ensuring that any concerns over Modern Slavery and People Trafficking are reported.
- **Training:** The Company ensures that its employees complete training that covers the Modern Slavery and Human Trafficking policy. We use an external provider to host this training (Flow Hospitality). All employees complete this training as part of their on-boarding on commencement of employment with Kew Green Hotels. We aim for all of our employees to have completed this training within the first 90 days of employment.

RELEVANT POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Modern Slavery, Child Exploitation and Human Trafficking Policy:** This policy sets out the Company's stance on modern slavery and explains how colleagues can identify any instances of this and where they can go for help.

- **Colleague Code of Conduct:** The Code of Conduct explains the way we behave as a reputable business and the actions and behaviour expected of our colleagues whilst representing the Company.
- **Whistleblowing policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Recruitment/Agency workers:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. This is completed at hotel level when a supplier is being used on an ad hoc basis. Where this agency becomes a permanent supplier, this will be completed by setting up a supplier agreement with the Purchasing Director and a member of The People Team.

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews with its existing suppliers. The organisation's due diligence and reviews include:

- Pre-qualification of all new potential suppliers, including evaluation of the modern slavery and human trafficking risks
- Reviewing on a regular basis all aspects of the supply chain in strategic supplier review meetings;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or violate relevant legislation, including the termination of the business relationship.

PERFORMANCE INDICATORS

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- Requiring all staff to have completed online training on modern slavery by July 2021 and within the first 90 days of employment for any new colleagues;
- Formalising Suppliers Code of Conduct document by May 2021 and ensuring that all existing suppliers/contractors adhere to it by August 2021;
- Continuing to access all new & potential suppliers via a pre-qualification procurement process.

TRAINING

The Company requires all employees to complete training on modern slavery.

The Company's modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company.

AWARENESS RAISING ACTIVITY

As well as training colleagues, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises and circulating information through email to colleagues.

The flyers and emails explain to colleagues:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

CEO APPROVAL

This statement was approved on 17th August 2021 by the organisation's CEO, who will ensure it is reviewed and updated annually.

CEO signature:



Date:

17th August 2021