

# MODERN SLAVERY ACT 2015 STATEMENT

## Britannia Hotels Group

Britannia Hotels Group operates 63 hotels with sites based throughout the UK. Britannia Hotels No2 Ltd makes this statement on behalf of all group entities including Britannia Hotels Limited. There are a number of ownership entities, however, all parts of the group are centrally managed. This is the Modern Slavery Transparency Statement of Britannia Hotels Group for the Financial year ending 31 March 2026. This statement is made pursuant to S54 (1) of the Modern Slavery Act 2015.

It is acknowledged that particular areas of risk may be present in the provision of supply chains behind the supply of furniture and food, and in respect of the potential use of hotels for activities by individuals that breach modern slavery laws. Likewise, hotel employees include permanent, seasonal and casual workers from wide ranging nationalities. Whilst strict procedures are in place for employees, other risks are involved via the provision of agency workers recruited through external agencies.

### **Employed Staff**

All UK staff are vetted for their right to work in the UK and until such proof is provided staff cannot be entered onto the payroll. All UK staff are paid at least the minimum wage, and we work and strive towards a living wage for all.

Britannia Hotels have a whistleblowing policy within their staff handbook and all staff are aware of a reporting procedure for any matter of concern including issues relating to modern slavery. Further progress has been made on our whistleblowing policy with an online reporting facility and updated training. Britannia Hotels have employees from many different nationalities working together, which is a key part of our business culture. We place great emphasis on equal opportunities for all and maintain strict codes of conduct in relation to bullying and harassment, supported by comprehensive policies and regular staff training.

### **Agency Staff**

Use of any agency staff is extremely limited with most staff being employed directly. Where an agency is utilised, all contracts issued by them will have to contain a pre-contractual clause declaring compliance with the Modern Slavery Act 2015.

### **Child Sexual Exploitation (“CSE”) awareness**

CSE training is included as part of the induction process for front desk staff. This training focuses on identifying vulnerable or underage individuals who may be at risk of exploitation by other guests within the hotel environment. The purpose of this is to help address and prevent the misuse of hotels for activities that may be contrary to the Modern Slavery Act 2015. As the risks and methods associated with CSE are continually evolving, Britannia works closely with external authorities, including police initiatives, to address potential issues and ensure that staff knowledge and awareness remain up to date with current developments.

### **Supply chains and workers’ rights**

UK based Suppliers used by hotel sites have to be from a pre confirmed list of trusted local suppliers or suppliers form a group wide contract.

The overwhelming majority of products and services are commissioned/ordered through Purchase Orders. The standards and expectations under which Britannia requires suppliers and providers to conduct their operations are set out in the Terms and Conditions issued to all suppliers and providers prior to entering any contract. The Purchase Order forms' Terms and Conditions have been updated, requiring that suppliers confirm compliance with the Modern Slavery Act.

Likewise, all new group supply agreements will include a clause requiring compliance with the Modern Slavery Act 2015.

Where there are long-standing suppliers operating in the limited areas where goods or services are not ordered or commissioned through Purchase Orders, a process will be undertaken to agree a variation or amendment incorporating such a clause. In all other cases, the supplier or provider will be required to confirm in writing that they will comply at all times with the Modern Slavery Act 2015. This will apply to both UK and non-UK suppliers/providers.

### **Company Policies /Procedures**

Awareness is key, so training programmes are available and are being developed so all workers are aware of the Modern Slavery Act and its implications to the hotel industry. Such processes are under constant review.

Signed by

A handwritten signature in black ink, appearing to read 'P Streets', with a long horizontal flourish extending to the right.

Paul Streets

*Director on behalf of the Britannia Hotels Group and Board Compliance Officer for the annual modern slavery and human trafficking statement*