

Modern Slavery Statement

DTP Hospitality Limited

This statement constitutes the Modern Slavery Statement of DTP Hospitality Limited under the Modern Slavery Act 2015, and also that of certain subsidiaries of the company, namely DTP Finance Number 1 Limited and DTP Acquisition 1 Limited (together "DTP")¹.

The Act prohibits slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). DTP is committed to ensuring Modern Slavery does not take place in its business, or within its supply chain and understands that it can play an important role in helping overcome Modern Slavery and protect other human rights abuses.

Our business and supply chains

DTP owns 17 hotels located in key locations across the UK, which provide accommodation, food and beverage, conference and events services, leisure clubs and spas. DTP employs 1722 staff. The hotels of DTP are listed below:

Crowne Plaza Chester	Doubletree by Hilton Leeds
Crowne Plaza Glasgow	Doubletree by Hilton Manchester
Crowne Plaza Harrogate	Hilton Garden Inn Birmingham
Crowne Plaza Nottingham	Hilton Garden Inn Bristol
Crowne Plaza Plymouth	Hilton Garden Inn Glasgow
Crowne Plaza Solihull	Hotel Indigo, Liverpool
Crowne Plaza Stratford upon Avon	AC by Marriott Salford Quays
Holiday Inn Peterborough West	AC by Marriott Birmingham
Doubletree by Hilton Chester Hotel & Spa	

Valor Hospitality Europe Limited ("Valor"), as the third party management company operating Hotels for DTP Hospitality Limited, has taken steps to reduce the risk of Modern Slavery existing in DTP's business and supply chains. Valor is not itself obliged to publish a Modern Slavery Statement. However, it operates under the compliance steps recorded in this statement.

DTP has supplier relationships with external businesses to support the running of the hotels as follows:

- An arrangement with Valor to manage the hotels on behalf of DTP Hospitality Limited;
- Arrangements for the supply of goods and services (including some provision through contractors) to the hotels; and
- Arrangements to supply agency workers to supplement hotel staffing needs.

Our actions in respect of Modern Slavery

¹ Until 9 December 2019, the DTP Hospitality Limited was known as BPH Hospitality Limited. The name change was registered with Companies House on 20 December 2019 due to the share sale to DTP Infinities Corporation Limited. DTP will be used throughout this statement, even if the steps taken were carried out under the previous name of the company.



This is the fourth Modern Slavery Statement published by DTP². The policies and procedures referred to in this statement were operated under the previous owner and will continue to be applied and reviewed going forward.

In the financial year 1 January 2020 to 31 December 2020, DTP and Valor have continued to maintain and enhance its Modern Slavery compliance programme. In the last financial year, DTP and Valor have focused on the following steps to reduce the risk of Modern Slavery existing in the business and its supply chains:

- Conducting a review of areas within the business and supply chains which present an increased risk of Modern Slavery occurring. This was undertaken via an online review involving suppliers completing a detailed checklist of many compliance aspects including Modern Slavery compliance.
- Continued its policy confirming its zero tolerance stance to all forms of Modern Slavery activities occurring in its business and /or supply chains. This is endorsed in our Employee Handbook.
- Cascaded annual training to our team to maintain awareness of Modern Slavery risks in our business.

Set out below are the details of the compliance steps that were in place in the relevant financial year.


Policies and Procedures

The following policies and procedures assisted DTP and Valor in combatting Modern Slavery:

- Central Register of Suppliers – this central register of suppliers holds details of approved contractors and suppliers for hotel goods and services. This central register includes a control process to limit the purchasing of items from sources which have not been assessed from a Modern Slavery perspective, thus controlling the potential risk of Modern Slavery.
- Our Modern Slavery & Human Trafficking Policy – this reflects our commitment to acting ethically and with integrity in our business relationships to ensure Modern Slavery is not taking place in our business and supply chains.
- Our Recruitment Procedures – as part of our on-boarding procedures, we carry out eligibility to work in the UK checks upon commencement and repeatedly including when work permits expire.
- Whistleblowing Policy – Our whistleblowing policy enables employees to raise any genuine concerns in respect of Modern Slavery without suffering any form of detriment as a result.
- New or renewed contracts for services or supplies contain clauses under which suppliers warrant that Modern Slavery does not occur in their business or in connection with the services / supplies being provided. The contractual terms also enable regular reviews and audits, where DTP considers that necessary.
- Third parties are also subject to contractual controls in respect of Modern Slavery and which entitle DTP to immediately terminate the agreement in the event of breach.

Due Diligence

We conducted the following due diligence over the relevant period:



² Or by BPH Hospitality Limited, the previous name of the company.

- Meetings were conducted by Valor with 61 suppliers and contractors that provided goods or services to the hotels. These suppliers were selected on the basis of the level of risk they may present and their workforce. The suppliers included food and drink, uniform, and transport suppliers, cleaning contractors and employment agencies for temporary workers.
- The identified suppliers' processes and practices were all assessed against the defined compliance checklist.
- An independent third party was engaged to undertake and review the online supplier assessments and the robustness of the supporting documentation submitted. Any omissions were challenged and further detail / documentation was requested to enable the supplier to be fully considered and assessed as operating with established processes to combat or prevent acts of Modern Slavery.
- DTP has a collaborative supply agreement with our procurement partner who carries out separate audits and supplier reviews, and shares compliance reports on an ongoing basis.
- Continued with our established practice of undertaking quarterly review meetings with our procurement partner (Compass) to discuss the findings of the supplier compliance regime they undertake with organisations listed on the EPSYS (Electronic Purchasing System). This review informs whether these suppliers should be accepted or rejected as appropriate partners for DTP.

Training and Awareness

- New employees completed Modern Slavery training as part of their hotel induction. The induction includes a section on the importance of reporting any concerns they may have about the suspicions of Modern Slavery.
- The requirement to be aware of Modern Slavery risk was included on all job descriptions for each employee.
- Employees completed human rights learning modules, which form part of our franchise agreements to operate hotels under licence from Marriott International Hotels, Hilton Hotels, and Inter-continental Hotel Group (IHG). These training standards are mandatory requirements, which contain detailed information on how to spot signs of, and help combat, Modern Slavery in our hotels.
- All our existing employees received annual refresher training on Modern Slavery and are empowered to identify signs of human trafficking.
- In respect of training, 775 new hire employees have undergone initial orientation training and 1999 employees undertook refresher training on Modern Slavery in the last financial year.

Effectiveness of policies

- We have reviewed the effectiveness of our policies, compliance steps and training undertaken.
- The statistics for our Modern Slavery training are provided above.
- There have been no cases of breaches of our Modern Slavery policies reported under Whistleblowing procedures or by any other means.
- We consider that our stance on Modern Slavery is understood in our business and that we have a range of effective compliance steps in place.
- We will continue to monitor our compliance programme and consider enhancements.

Our Future Focus

We are committed to our zero-tolerance policy in respect of Modern Slavery and will continue to review our processes and procedures to identify areas for ongoing improvement.



DTP are committed to conducting all of its business activities ethically, with integrity and with due consideration for human rights and fair labour practices.

DTP will immediately investigate any alleged incidents or complaints relating to Modern Slavery.

Approval

This statement has been approved by the board of directors of the undernoted companies on 28 July 2021

DTP Hospitality Limited

Signed: 

Date: 28/7/21

Name: Wanida Suksuwan

Title: Director

DTP Finance Number 1 Limited

Signed: 

Date: 28/7/21

Name: Wanida Suksuwan

Title: Director

DTP Acquisition 1 Limited

Signed: 

Date: 28/7/21

Name: Wanida Suksuwan

Title: Director

