

HICP LIMITED

MODERN SLAVERY STATEMENT

This is the Modern Slavery Statement of HICP Limited (“**HICP**”) for the financial year ending 31 March 2021, published in accordance with section 54 of the Modern Slavery Act 2015 (the “**Act**”).

The Act creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking (“**Modern Slavery**”). HICP appreciates that the hospitality sector presents risks from a Modern Slavery perspective. HICP is opposed to all forms of Modern Slavery and policies and procedures are in place to address the risks, as described below.

ABOUT HICP

HICP operates hotels in various locations in the UK, which provide accommodation, food and beverage, conference and events services and leisure clubs. In the financial year to 31 March 2021, HICP operated the following hotels:

Holiday Inn London Gatwick	Holiday Inn Hemel Hempstead
Holiday Inn Southampton	Holiday Inn Reading South
Holiday Inn Farnborough	Crowne Plaza Leeds
Holiday Inn Aylesbury	Holiday Inn Fareham
Holiday Inn Basingstoke	Holiday Gloucester
Holiday Inn Bexley	Holiday Inn High Wycombe
Holiday Inn Coventry	Holiday Inn Hull
Holiday Inn Leicester	Holiday Inn Southampton-Eastleigh

The above hotels are operated under the InterContinental Hotel Group (“**IHG**”) franchise, and as a result HICP is committed to implementing and complying with the policies and procedures of IHG. Policies of IHG relevant to Modern Slavery including IHG’s Code of Conduct, Human Rights Policy and Supplier Code of Conduct can be found [here](#). Copies of IHG’s Modern Slavery Statement can be found [here](#). These will be referred to further below.

Alongside the policies and procedures of IHG, HICP has its own policies and procedures in respect of Modern Slavery. These were developed alongside a third-party management company, which is engaged to support the operation of HICP’s hotels. Since the financial year end, HICP has changed its third-party management company and now utilises Valor Hospitality Europe (“**Valor**”) to operate the hotels on behalf of HICP. Since appointment, Valor has taken steps to review the policies and procedures already in place in respect of Modern Slavery, and any changes made will be reported in the next Modern Slavery Statement.

POLICIES IN RESPECT OF MODERN SLAVERY

In the relevant financial year, the following policies and procedures relevant to Modern Slavery were implemented in respect of HICP hotels:

Human Rights Policies

HICP has adopted its own Human Rights Policy which includes commitments in respect of Modern Slavery. It states that HICP does not support Modern Slavery. HICP seeks to be vigilant and improve its operations and requires its business partners to share its values and undertake similar commitments when working with HICP. A copy of this policy is provided to all colleagues upon joining the business as part of their induction pack.

IHG's Human Rights Policy is also implemented within the business and states that IHG condemns and prohibits any form of Modern Slavery and the business is committed to compliance with all applicable laws and regulations regarding the prevention of Modern Slavery.

Modern Slavery Code of Conduct

HICP has in place a Modern Slavery Code of Conduct¹ that outlines our expectations in respect of practices concerning Modern Slavery prevention.

The code outlines a zero-tolerance approach to Modern Slavery and commitment to acting ethically and with integrity in all business relationships and to ensuring there are no acts of Modern Slavery within any parts of the business or supply chains.

In accordance with the above code, employees and anyone doing business with the company is expected to comply with the following principles:

1. Comply with the provisions of all legislation related to Modern Slavery.
2. Avoid any activity resulting in a breach of the requirements of the Act or the code.
3. Raise any concerns about any suspicion of Modern Slavery in any part of the business or supply chains.
4. Prevent, detect, or report any instances of Modern Slavery within the business or supply chains.
5. Raise concerns immediately if there is a suspicion of a breach of the code.

IHG's Code of Conduct is also applicable in the management of the hotels and states that IHG will not tolerate any form of Modern Slavery within its own operations or those of their supply chains.

Whistleblowing

A whistleblowing policy in place which encourages colleagues to report any suspected wrongdoings. The policy encourages colleagues to raise any suspicions in respect of Modern Slavery as soon as possible.

IHG Supplier Code of Conduct

Franchised hotels are also required to comply with IHG's Supplier Code of Conduct which places an obligation on suppliers to comply with the laws and regulations in the countries in which they source, operate and supply and states that IHG has a zero-tolerance approach to Modern Slavery.

¹ Entitled Anti-slavery and Human Trafficking Code of Conduct

PROCEDURES

In addition to our policies in respect of Modern Slavery, we have in place processes and procedures to identify risks of Modern Slavery in our business and supply chains, including:

- Our current HR Toolkit contains recruitment procedures include carrying out thorough right to work checks and ensuring that colleagues have the appropriate work permits.
- HICP procedures require that suppliers comply with HICP's Modern Slavery Code of Conduct prior to engagement and requires compliance with the code throughout the contractual relationship.
- As above, whistleblowing procedures which encourage colleagues to report suspected acts of Modern Slavery.

In addition to the above procedures that are focused on Modern Slavery risk, HICP has a range of related policies and procedures covering issues such as, Health and Safety and Anti-Bribery, which assist in respect of HICP's overall compliance framework and the ethical standards required in HICP's business and supply chains.

TRAINING AND COMMUNICATIONS

Modern Slavery training is provided to all staff, and colleagues are referred to the "Ways of Working" employee handbook during induction, which provides further details of relevant policies. All staff are aware of "red flags" of Modern Slavery which they should consider when dealing with suppliers during contractual negotiations, site visits or any interaction with the suppliers and its workers, and whilst carrying out recruitment processes.

In January 2021, a human rights update was provided to the business. The update provided guidance on the following:

1. The link between human rights and Modern Slavery, focusing specifically on the risk of labour exploitation.
2. A summary of the Act and the obligations contained therein.
3. A summary of the ethical principles and human rights obligations contained within the business's Procurement Policy and Procedures Manual, including details of the evidence to be supplied by tenderers at the invitation to tender stage.
4. Modern Slavery training is also provided by way of the business's Learning Management Platform called Flow, these sessions are aimed at all employees. The last Flow session took place in April 2021 and 307 employees completed the Modern Slavery module as part the of the training.

SUPPLY CHAIN

HICP will not enter into any business relationship with a third-party if they make use of forced, compulsory or trafficked labour or anyone held in Modern Slavery.

Third-party suppliers are made aware of their obligations under the Code of Conduct (outlined above) prior to signing any contract with HICP and are expected to comply with the same throughout the life of the contract. Any breaches of the Code of Conduct can result in the termination of the relationship with the third-party supplier.

Suppliers are also expected to comply with IHG's Supplier Code of Conduct, and any material breaches of the Code may lead to the termination of their contract with the business.

LOOKING AHEAD

As above, HICP have recently engaged Valor Hospitality Europe Limited who are in the process of reviewing the policies and procedures of HICP in respect of Modern Slavery. Any amendments to our policies will be reported in our next Modern Slavery statement.

APPROVAL

This statement made pursuant to section 54(1) of the Act for the financial year ending 31 March 2021 has been approved by the board of Directors of HICP on 12.11 2021.

Signature of Director:

for and on behalf of HICP Limited

DocuSigned by:
Bhriz Holloway
20EE31B3ADE1426...

Bhriz Holloway

DocuSigned by:
Chris Kula
6E7CF0134D57478...

Chris Kula

DocuSigned by:
Jonathan Bradley
D2D3CA1C0B9240A...

Jonathan Bradley