

## 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").

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 protecting against 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 1,728 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

This is the sixth Modern Slavery Statement published by DTP.

In the financial year 1 January 2022 to 31 December 2022, 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:

- Continuing 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.
- Cascading annual training to our team to maintain awareness of Modern Slavery risks in our business.
- Continuing the transition of all suppliers onto the OneTrust system where their Modern Slavery credentials can be verified.
- Continuing regular quarterly meetings of the Modern Slavery Project Group where the policies and procedures in place to monitor areas of the business and supply chains which present an increased risk of Modern Slavery occurring, are reviewed and assessed for continued suitability.
- Introduction of a new, more easily accessible Whistleblowing helpline for reporting of any Modern Slavery related concerns.
- Issuing standard guidelines for hotels when using local vendors, high-street stores, and local service providers, along with an assessment form to assist in identifying any potential Modern Slavery risks within those businesses.
- Three outsourced housekeeping service suppliers have been required to verify their annual training programme delivery in respect of Modern Slavery.
- The use of agencies to supply temporary staffing solutions has been consolidated via one master vendor system, which takes responsibility for verifying the Modern Slavery credentials of all third-party agencies supplying the 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 process, we carry out eligibility to work in the UK checks upon commencement and repeatedly, as required, when work permits and Visas expire. This process is facilitated by an on-line portal, RightCheck, which assists in verifying right to work documents to ensure compliance.
- 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 of the supplier, where DTP considers that necessary.
- Third parties are also subject to contractual controls in respect of Modern Slavery which entitle DTP to immediately terminate the agreement in the event of any breach of these terms.

### **Due Diligence**

We conducted the following due diligence over the relevant period:



Suppliers have been entered on a central data base, OneTrust, which will collate, store responses, certification and accreditations from our suppliers. In addition, OneTrust will send reminders and anniversary renewals, automating the process whilst capturing a wider coverage

of our supply base. Our GPO (group purchasing organisation) Foodbuy, a part of Compass PLC, has continued to audit their suppliers that DTP and Valor have used over the past 12 months.

### **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 risk of Modern Slavery occurring within the business.
- The requirement to be aware of the risk of Modern Slavery is included in the employee handbook as part of legal compliance and ethics.
- 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 the risks of Modern Slavery and are empowered to identify and report signs of human trafficking.
- In respect of training, 427 new hire employees have undergone initial orientation training covering Modern Slavery and 1,464 employees undertook training/refresher training on Modern Slavery in the last financial year.

### **Effectiveness of policies**

- We have continued to monitor the effectiveness of our policies, compliance steps and training undertaken at our quarterly Modern Slavery Project Group meetings.
- The statistics for our Modern Slavery training are provided above.
- There has been no cases in respect of Modern Slavery 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 as necessary.

### **Our Future Focus**

We are committed to our zero-tolerance policy in respect of Modern Slavery and will continue to review our policies and procedures to identify areas for ongoing improvement and complete the implementation of those steps described in the "our actions" section of this statement.

DTP is 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 made pursuant to section 54(1) of the Act for the financial year ending 31 December 2022 has been approved by the board of directors of the undernoted companies on 30 May 2023.

x

### **DTP Hospitality Limited**

Signed:




Date: 30 May 2023

Name: Wanida Suksuwan

Title: Director, DTP Hospitality (UK) Ltd  
Modern Slavery Statement



x **DTP Finance Number 1 Limited**

Signed: 

*rjc*

x Date: 30 May 2023

Name: Wanida Suksuwan

Title: Director,  DTP Hospitalities (UK) Ltd

**DTP Acquisition 1 Limited**

Signed: Wanida Suksuwan

Date: 30 May 2023

Name: Wanida Suksuwan

Title: Director, DTP Hospitalities (UK) Ltd.