

## HICP LIMITED

### MODERN SLAVERY STATEMENT

This is the Modern Slavery Statement of HICP Limited (“**HICP**”) for the financial year ending 31 March 2023, 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.

#### **Our business and supply chains**

HICP operates hotels in various locations in the UK, which provide accommodation, food and beverage, conference and events services and leisure clubs. HICP employs 984 staff. In the financial year to 31 March 2023, 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 (until Aug 2022)	Holiday Gloucester
Holiday Inn Bexley	Holiday Inn High Wycombe
Holiday Inn Coventry	Holiday Inn Hull
Holiday Inn Leicester	Holiday Inn Southampton-Eastleigh
Courtyard by Marriott Edinburgh.	

The above hotels are operated under the InterContinental Hotel Group (“**IHG**”) and Marriott International franchises and, as a result, HICP is committed to implementing and complying with the policies and procedures of IHG and Marriott. 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](#). Marriott’s policies relevant to Modern Slavery can be found [here](#). Marriott’s Supplier Code of Conduct can be found [here](#).

Valor Hospitality Europe Limited (“**Valor**”), as the third-party management company operating Hotels for HICP Limited, has taken steps to reduce the risk of Modern Slavery existing in HICP’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.

HICP 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 HICP 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**

In the financial year 1 April 2022 to 31 March 2023, HICP and Valor have continued to maintain and enhance its Modern Slavery compliance programme. In the last financial year, HICP 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 of 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 HICP 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, where HICP considers that necessary.
- Third parties are also subject to contractual controls in respect of Modern Slavery and which entitle HICP to immediately terminate the agreement in the event of breach.

## **Due Diligence**

We conducted the following due diligence over the relevant period:

Suppliers have been entered on to 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 its suppliers that HICP and Valor have used over the past 12 months.

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 Supplier Code of Conducts, and any material breaches of the Code may lead to the termination of their contract with the business.

Suppliers are also expected to adhere to the principles, standards and guidelines outlined in Marriott's Code of Conduct. Failure to uphold those guidelines and those covered in Marriott's Principles of Responsible Business could jeopardise the business relationship.

## **Training and Awareness**

- New employees complete 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 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, and Intercontinental 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 and report signs of human trafficking.
- In respect of training, 278 new hire employees have undergone initial orientation training covering Modern Slavery and 853 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.
- The statistics for our Modern Slavery training are provided above.
- There have 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.

### **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 and complete the implementation of those steps described in the “our actions” section of this statement.

HICP is committed to conducting all business activities ethically, with integrity and with due consideration for human rights and fair labour practices.

HICP 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 March 2023 has been approved by the board of Directors of HICP on

#### **HICP Limited**

Signed:  DocuSigned by:  
Bhriz Holloway  
20EE31B3ADE1426...

Date: 7/11/2023 | 9:51:53 AM CEST

Name: Bhriz Holloway

Title: Director