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### **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 1,872 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.

The above hotels are licensed and operated under the InterContinental Hotel Group ("IHG"), Hilton Hotels and Resorts and Marriott International franchises and, as a result, DTP is committed to implementing and complying with the policies and procedures of IHG, Hilton 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. Hilton's statement relevant to modern slavery can be found Here. Hilton's Code of Conduct 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"), 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.

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# **Our actions in respect of Modern Slavery**

This is the seventh Modern Slavery Statement published by DTP.

In the financial year 1 January 2023 to 31 December 2023, 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 a 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 core suppliers onto the Onetrust system where their modern slavery credentials can be verified. 84% of core suppliers have now been registered and 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.
- Maintaining a well-advertised and easily accessible Whistleblowing helpline for reporting 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 and seeking the confirmation of those suppliers that they agree to adopt Valor's stance on modern slavery. A procedure is being embedded in the hotel compliance audits to check that these documents are in place.
- Seeking to reduce the number of workers required from third-party agencies by building banks of
  directly employed occasional workers. Where the use of agencies to supply temporary staffing
  solutions is still required, DTP has continued to access these via one master vendor system, which
  takes responsibility for verifying the modern slavery credentials of all third-party agencies
  supporting the business.
- We continue to co-operate with all customers in providing information to satisfy their enquiries regarding DTP's actions to prevent modern slavery occurring within the business and our supply chains.

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:

- Onetrust this central database of suppliers holds details of approved contractors and suppliers for hotel goods and services. This central database 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, in confidence if required, and 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 and store responses, certification and accreditations from our suppliers. In addition, Onetrust will send reminders and anniversary renewals of verification; automating the process and enabling us to capture a wider coverage of our supply base. Our 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, providing greater assurance of modern slavery compliance.

## **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 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 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, 823 new hire employees have undergone initial orientation training covering modern slavery and 1,994 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

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undertaken at our quarterly Modern Slavery Project Group meetings.

- 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 as necessary.

#### **Our Future Focus**

We are committed to our zero-tolerance policy in respect of modern slavery and in a planned review of our policies and procedures during 2024 we will 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.

Valor, on behalf of 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 2023 has been approved by the board of directors of the undernoted companies on 10 July 2024.

#### **DTP Hospitality Limited**

Signed: Date: 10 July 2024

Name: Ms. Wanida Suksuwan Title: Director

**DTP Finance Number 1 Limited** 

Signed: Date: 10 July 2024

Name: Ms. Wanida Suksuwan Title: Director

**DTP Acquisition 1 Limited** 

Signed: Date: 10 July 2024

Name: Ms. Wanida Suksuwan Title: Director