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## HICP LIMITED

### MODERN SLAVERY STATEMENT

This is the Modern Slavery Statement of HICP Limited (“HICP”) for the financial year ending 31 March 2024, 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 with policies and procedures 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 970 staff. In the financial year to 31 March 2024, 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
Crowne Plaza Felbridge	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 licensed and 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"), 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 2023 to 31 March 2024, 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 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 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 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, HICP 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 HICP'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 HICP and Valor in combatting modern slavery:

- Onetrust – this central database of suppliers holds details of approved contractors and suppliers for hotel goods and services. Onetrust 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, 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 any breach.

## **Due Diligence**

We conducted the following due diligence over the relevant period:

Suppliers have been assessed and entered on to a central database, Onetrust, which will collate, store responses, certification and accreditations from our suppliers. In addition, Onetrust will send reminders and anniversary renewals of verification, automating the process whilst capturing a wider coverage of our supply base. Our 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, providing greater assurance of modern slavery compliance.

## **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 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 and report signs of human trafficking.
- In respect of training, 477 new hire employees have undergone initial orientation training covering modern slavery and 1146 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 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.

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

Valor, on behalf of 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 2024 has been approved by the board of Directors of HICP on \_\_\_\_\_ 2024.

HICP Limited

Signed:



Date:

18/06/2024

Name:

JONATHAN RIMBLEY

Title:

DIRECTOR.