Modern Slavery Statement

Bryant Park Hospitality

Pursuant to s. 54 of the Modern Slavery Act 2015, this statement constitutes the Modern Slavery Statement of Bryant Park Hospitality Limited and that of subsidiaries obliged to report under the Act, namely BPH Finance Number 1 Limited and BPH Acquisition 1 Limited (together “BPH”).

The Modern Slavery Act 2015 prohibits slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). BPH is committed to ensuring Modern Slavery does not take place in its business, or within its supply chain.

BPH understands that the business can play an important role in helping overcome Modern Slavery and protect other human rights abuses.

Our business and supply chains

BPH owns hotels located in different key locations across the UK which provide accommodation, food and beverage, conference and events services, leisure clubs and spas. BPH employs 1895 staff. The hotels of BPH are listed below:

- Crowne Plaza Chester
- Crowne Plaza Harrogate
- Crowne Plaza Plymouth
- Crowne Plaza Solihull
- Crowne Plaza Glasgow
- Crowne Plaza Nottingham
- Crowne Plaza Stratford upon Avon
- Holiday Inn Peterborough West
- Doubletree by Hilton Chester Hotel

- Doubletree by Hilton Manchester
- Doubletree by Hilton Leeds
- Hilton Garden Inn Glasgow
- Hilton Garden Inn Birmingham
- Hilton Garden Inn Bristol
- Hotel Indigo, Liverpool
- AC Salford Quays
- AC Birmingham

Valor Hospitality Europe Limited, as the management company operating BPH’s business, has taken steps to reduce the risk of Modern Slavery existing in BPH’s business and supply chains. Valor Hospitality Europe is not itself obliged to publish a Modern Slavery Statement, however it and the wider BPH group operates under the compliance steps recorded in this statement.

BPH has supplier relationships with external businesses to support the running of the hotels as follows:

- An arrangement with Valor Hospitality Europe to manage the hotels on behalf of BPH;
- Arrangements to supply agency workers to supplement hotel staffing needs; and
- Arrangements for the supply of goods and services (including some provision through contractors) to the hotels.
Our actions in respect of Modern Slavery

BPH first made a Modern Slavery Statement following the fiscal year ending 31 December 2016 and this statement is BPH’s third Modern Slavery Statement.

In the financial year 1 January 2018 to 31 December 2018, BPH, in conjunction with Valor Hospitality Europe Limited, has continued to develop its Modern Slavery compliance program and, in summary, has taken the following steps to reduce the risk of Modern Slavery existing in BPH’s business and supply chains:

- Reviewed identified areas within BPH’s business and supply chain which present an increased risk of Modern Slavery occurring.
- Continued the roll-out of its policy confirming its zero tolerance stance on all forms of Modern Slavery activities occurring in its business and /or supply chains. This is endorsed in our Employee Handbooks.
- Cascaded training to our team to maintain awareness of Modern Slavery risks in our business.

Set out below is further detail on the compliance steps that were in place in the relevant financial year.

Policies and Procedures

The following policies and procedures assisted BPH in combatting Modern Slavery:

- Central Register of core Suppliers – this central register of suppliers holds details of approved contractors and suppliers for hotel goods and services. This central register brings a control process and limits the purchasing of items from sources which have not been assessed, thus controlling the potential risk of 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.
- Our Recruitment Procedures – as part of our on-boarding procedures, BPH carries out eligibility to work in the UK checks.
- Our Whistleblowing Policy – BPH has a whistleblowing policy so that team members can raise any genuine concerns without suffering any form of detriment as a result.
- In new or renewed contracts for services or supplies, BPH includes terms warranting that Modern Slavery does not occur in the supplier's business or in connection with the services / supplies and incorporates provisions regarding the review/audit of suppliers, where BPH considers that necessary.
- Self-employed contractors and contracts for the hire of work space by third party business partners were reviewed and revised to include a requirement for the Service Provider to confirm that it has not been and is not engaged in any practices connected to Modern Slavery. The contracts confirm any instances of Modern Slavery connected to the Service Provider will entitle BPH to immediately terminate.
Due Diligence

BPH conducted the following due diligence over the relevant period:

- In 2018 we approached circa 70 current suppliers and contractors that provide goods or services to our hotels. These suppliers were selected on the basis of the level of risk they may present. Companies that manufacture goods abroad where we have little or no sight of the work force were included in the companies approached.
- The due diligence undertaken with suppliers included agencies who provide personnel who undertake tasks in BPH hotels.
- The suppliers identified completed an online assessment and uploaded requested documents to confirm their business complies with our required standards. Information provided was assessed and where there were omissions, we requested more detail / documentation.
- A number of suppliers have been removed from our central list of suppliers in 2018 as they did not co-operate in the above review.
- We have collaborative supply agreements with our procurement partner who carries out separate audits and supplier reviews that are shared with us as required. In 2018 we reviewed several audits in order to verify the areas of assessment.

Effectiveness of policies

- BPH has reviewed the effectiveness of the policy, the compliance steps and the training undertaken. Testing of employee knowledge has been assessed via the third party support partner’s on line training testing and assessment. Employee knowledge has been demonstrated through the actions taken to highlight potential breaches of Modern Slavery by residents of the hotel.

Training and Awareness

- All new team members completed Modern Slavery training as part of their hotel induction. This included a section on the importance of reporting any concerns they may have about Modern Slavery.
- Modern Slavery awareness is included on all job role specific task training profiles for team members.
- Team Members 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.
- In 2018 we introduced new training materials targeted to be delivered in a classroom environment for a group of employees. The content included awareness of ‘closer to home’ incidents of Modern Slavery in the UK, case studies and video based footage.
- Our existing Team Members received annual refresher training on Modern Slavery.
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. One such area of focus will be developing and implementing a Code of Conduct for our Suppliers.

Approval

This statement has been approved by the board of directors of Bryant Park Hospitality Limited, BPH Finance Number 1 Limited and BPH Acquisition 1 Limited on June 5, 2019

Bryant Park Hospitality Limited
Signed: [Signature]  
Name: JONATHAN LEAIDLEY  
Date: JUNE 5, 2019  
Title: DIRECTOR

BPH Finance Number 1 Limited
Signed: [Signature]  
Name: JONATHAN LEAIDLEY  
Date: JUNE 5, 2019  
Title: DIRECTOR

BPH Acquisition 1 Limited
Signed: [Signature]  
Name: JONATHAN LEAIDLEY  
Date: JUNE 5, 2019  
Title: DIRECTOR