

SLAVERY ACT STATEMENT Britannia Hotels Group

Britannia Hotels Group Including Pontins Parks is a 60 hotel and six holiday park chain with sites based throughout the UK.

Britannia Hotels Limited makes this statement on behalf of all group entities including Pontins. There are a number of ownership entities however all parts of the group are centrally managed.

This is the Modern Slavery Transparency Statement of Britannia Hotels Group for the Financial year ending 31 March 2019. This statement is made pursuant to S54 (1) of the Modern Slavery Act 2015.

The Britannia Hotels Group The Britannia Hotel Group considers all aspects of equality as extremely important and is in the process of addressing all reasonable avenues to ensure slavery and human trafficking is not present within its supply chains or operations. The hotel industry has a unique set of difficult management issues in dealing with large numbers of consumers and supply chain scenarios be it for food, services, furniture or building works.

Particular areas of risk have been identified as in the provision of supply chains behind the supply of furniture and food supply chains and in respect of the use of hotels for activities by individuals that breach modern slavery laws

Likewise hotel employees include permanent, seasonal and casual workers from wide ranging nationalities. Whilst strict procedures are in place for employees other areas of risk identifies involve agency workers recruited through external agencies

Employed Staff

- All uk staff are vetted for their right to work in the UK - until such proof is provided staff cannot be entered onto the payroll
- All UK staff are paid at least the minimum wage and we work and strive towards a living wage for all
- Britannia Hotels have a whistleblowing policy within their staff handbook and all staff are aware of a reporting procedure for any matter of concern including issues relating to modern slavery. The handbook is in the process of being adjusted to positively highlight the Slavery Act as a whistleblowing issue
- Britannia Hotels have many nationalities working together and it is a trademark of the business with a great emphasis on equal opportunities for all
- Strict codes of conduct relating to bullying and harassment are paramount with full policies and training provided to staff

Agency Staff

- Use of any agency staff is extremely limited with most staff being employed directly. Where an agency is used a questionnaire is being devised that all such agencies must complete to be a recommended agency for the Group and all contracts signed by them will need to have a compliance with the Slavery Act clause in them

CSE awareness

- CSE training is included in staff inductions for front desk staff. This is a process of identifying vulnerable or underage individuals that may be being exploited by other guests in a hotel. This is attempting to tackle the problem of the use of hotels for activities contrary to the Slavery Act.
- CSE is a constantly developing and difficult area of awareness in the hotel industry that directly connects with the issues the Slavery Act is addressing whilst having to work with in data rights of individuals . It is an ongoing process given the sheer number of guests booking into hotels every day and Britannia are also engaging in a process of voluntary alliance with police initiatives to address the problems.

Supply chains and workers rights

- UK based Suppliers used by hotel sites have to be from a pre confirmed list of trusted local suppliers or suppliers form a group wide contract . All those suppliers have to agree the terms and conditions attached to the purchase orders or have signed a group wide master contract . The purchase order form is in the process of being amended to make it a term and condition that suppliers confirm to the Modern Slavery Act . Likewise it is envisaged that all new group supply agreements will have a compliance clause with the Modern slavery act incorporated into them. Where there are long standing suppliers there will be a process applied of an agreed variation amendment to include such a clause. Where a stream of supply has no previous trusted supplier then it will be ensured that due diligence is carried out into their operation and they agree the Slavery Act provision in either purchase order or contract . The long term effect is that suppliers have had to declare they conform and that any breach found to exist would be an automatic breach of contract that can lead to loss of the business to the supplier.
- Where suppliers of goods are located outside the UK - Britannia are in the process of devising a questionnaire for all such worldwide suppliers that will ask them to declare their compliance with the slavery act and declare the number and wages of staff and their factory address. This will attempt to establish their structure exists and they operate reasonable factory premises.
- We are devising training for staff dealing with offshore suppliers to be able to be aware of any issues or markers in their verbal dealings with suppliers that may indicate such companies are not compliant. The aim is if any supplier provokes suspicions regarding the treatment of their workers the staff involved can report this issue through our staff handbook processes or through their line manager and the Group will assess that supplier and if there is no alternative supplier attempt to address the issue or if there is an alternative supplier refuse to engage the supplier thought to be in breach of the Act.

Company Policies /Procedures

Awareness is the key so training programmes are available and are being developed so all workers are aware of the Slavery Act and its implications to the hotel industry. Such processes are under constant review however on line training programmes are making

availability of training more accessible to all staff and these programmes are constantly under review.

It is recognised it will take time to introduce the initiatives underway however Britannia remain committed to addressing procedures so that compliance with the Slavery Act becomes the normal situation throughout its supply chains and that as far as is possible procedures are in place at all sites to identify any potential customers deliberately using the anonymity of a hotel location to put any other person at risk.

Signed by [*Robert Ferrari*]

Director on behalf of the Britannia Hotels Group and Board Compliance Officer for the annual slavery and human trafficking statement