MODERN SLAVERY ACT

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 2023 and sets out the steps that Hamlet Hotels Limited ("HHL") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). HHL are committed to combatting all forms of Modern Slavery.
HHL is committed to operating with integrity and accountability, both within its organisation and in all relationships with suppliers and other partners.

About Hamlet Hotels Limited

HHL is a privately owned company managing, Leasing and operating hotel businesses and which has its head office in London, England.

The business relies on the services of around 200 people (directly and indirectly). As a full-service hotel operator, its activities cover, food and beverage and service, guest reception services, housekeeping and other services delivery, administrative and accounting functions. The supply chain covers both central supply chains fully administered centrally, and hotel-based supply chains which are overseen from the centre.

HHL recognises that Modern Slavery includes the risks that arise from the use of foreign and migrant labour, and from supply chains both in the UK and overseas.

Policies and procedures

- Modern Slavery Policy – This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

- Code of conduct for Suppliers - issued to all suppliers and contractors, the Code requires positive confirmation of compliance. It has been reviewed and updated during the course of 2021.

- Recruitment – HHL conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.

- Whistleblowing Policy – HHL has a whistleblowing policy so that all employees can raise any concerns that they might have without fear of reprisals.

- Central register of recruitment agents and supplier contracts.

Due Diligence

HHL will only work with suppliers who formally confirm full compliance with its policies and exhibit due diligence in monitoring their own supply chains. The demonstration of this compliance is of extreme importance and is verified by risk assessment through random visits to supplier premises, and regular review of suppliers, their policies and by monitoring their on-line and media reputations.

Key Performance Indicators

- Number of incidents or complaints of slavery and human trafficking reported under HHL's Whistleblowing Policy or otherwise.
- Number of staff trained on Anti-Slavery and Whistleblowing Policies.
- Remedial actions required as a consequence of incidents or complaints recorded.

Training for Staff

Training is conducted for team members as part of a new starter's induction to ensure an understanding of the signs of modern slavery and to explain whistleblowing. On-line training modules have been developed and have been rolled out throughout the business, allowing us to monitor the compliance and understanding of team members regarding Modern Slavery much more easily. In addition, face to face training continues to be carried out. All senior managers attend a Health and Safety for Managers course which provides additional training. The topic is reviewed during regular HR team conference calls.

HHL has a dedicated compliance team, which consists of involvement from the following departments:

HHL can provide an additional specialist source of best practice, training, and compliance updates.

Future Steps

In the forthcoming year, HHL intends to take further additional steps including:

- Legal/Commercial
- Human Resources
- Regular reviews to monitor the effectiveness of the compliance programme.