



MODERN SLAVERY STATEMENT

Elite Hotels is an independently owned UK based company operating four hotels in the South of England, namely Ashdown Park Hotel, East Sussex, Tylney Hall Hotel, Hampshire, Luton Hoo Hotel, Bedfordshire and The Grand Hotel, Eastbourne.

Code of Conduct, Principles & Policies

Employing just over 800 personnel, we at Elite Hotels strive to deliver a diverse range of services to our customers and are committed to ensuring that we do so ethically and with integrity. Elite Hotels recognises the importance of the Modern Slavery Act as a tool to combatting any unwanted practices and to ensuring zero tolerance to any form of human trafficking within the workplace and supplier chain. During 2021, the company has implemented a number of new IT solutions which will improve our ability to manage our statutory obligations.

To support our commitment we have in place the following:

Supplier Conduct – Supplier agreements are issued to all new suppliers and managed centrally. This covers health, safety, environment, modern slavery and quality standards. Only approved suppliers are used within our business.

Personnel Recruitment – a robust recruitment policy is operated, with comprehensive vetting procedures in place for the hiring of all new employees. This includes confirming their identities, right to work in the UK and ensuring salaries are paid directly into an employee's personal bank account. This has been further improved during 2021 with the implementation of a new recruitment platform 'Recruit Genie' which ensures all key processes are followed and recorded. A central register of approved recruitment agencies is maintained with only nominated agencies used.

Whistle Blowing – as part of an independently managed Employment Assistance Programme, made available to all employees, an active whistle blowing policy is in place which allows anyone to raise concerns about how colleagues are being treated or practices within our business or supply chain without fear of reprisal.

Training & Development – we are committed to ensuring that the directors and all managers have been briefed on the Act including risks within the supply chain and how to recognise indicators of exploitation. To achieve this, directors and all managers have completed a comprehensive on-line training programme to reinforce understanding and awareness of the Act and the company's obligations. This training has been further enhanced by the implementation of a new training and development platform 'Flow' in 2021 which includes a number of new training modules in this important area. All new managers and directors complete this training as part of their induction programme.

Due Diligence & Measuring our Effectiveness

Where issues are identified these will be robustly dealt with by the appropriate senior managers within HR, Procurement and Operations. In addition, we as the company directors take an active role in monitoring performance and are committed to making further improvement in monitoring the potential risks within its supply chain. Any changes and progress will be reflected in subsequent annual statements.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Directors on 25th August 2021