

Policy Statement:

Modern Slavery Policy

1. Introduction

- 1.1. This policy sets out HOST's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains
- 1.2. As part of the hospitality sector, we recognise we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously
- 1.3. Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring its supply chains are free from slavery and human trafficking. As laid out in the Modern Slavery Act 2015, HOST are against all forms of domestic servitude, sexual, labour and criminal exploitation

2. Organisational Structure and Supply Chains

- 2.1. This statement covers the activities of HOST:
- 2.2. HOST provides specially designed accommodation for projects currently based in the UK
- 2.3. As well as our own team, we use subcontractors to provide our services such as, but not exclusive to, housekeeping, facilities management, security, groundskeeping and IT Support. We also use suppliers for food and beverage and purchasing of goods
- 2.4. High-risk activities
 - 2.4.1. The following activities are considered to be at high risk of slavery or human trafficking within the hospitality sector:
 - 2.4.1.1. Housekeeping: due to outsourced supply with English as a second language. Individuals deemed vulnerable are more likely to be recruited via coercion or deception, who then are isolated from their environment in order to be easily controlled and finally exploited
 - 2.4.1.2. Front of House: due to commission-based bookings and refund facilities being available to this role, this could be targeted by human traffickers to obtain money by deceit
 - 2.4.1.3. The purchase of goods and services representing hidden risks because of complex and multi-tiered supply chains
- 2.5. Responsibility
 - 2.5.1. Responsibility for our anti-slavery initiatives is as follows:
 - 2.5.1.1. Policies: Written and developed by our HR Manager, Health and Safety Manager and Information Officer. HOST have a suite of HR, H&S and Corporate Policies
 - 2.5.1.2. Investigations/due diligence: HOST use right to work checks in addition to other onboarding and reference checks which are completed by our Finance and HR teams. These checks are

carried out for all team members. It is company policy to follow the companies Standard Operating Procedures

2.5.1.3. The Commercial Team communicate with all subcontractors and suppliers during the tender process due diligence checks and ensure everyone is following company issued Standard Operating Procedures

2.5.1.4. Training: Team member training is currently carried out on our online learning platform FLOW. Training is available for all team members and is reconfirmed for managers in the form of an advanced module

3. Relevant Policies

3.1. We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

3.1.1. Code of Conduct: Our code makes clear to team members the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of team member conduct and ethical behaviour when operating and managing the supply chain. We are committed to ensuring our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure they meet the standards of the code and improve their worker's working conditions. However, serious violations of our client code of conduct will lead to the termination of the business relationship

3.1.2. Recruitment Agent Check: We use only our selected specified, reputable employment agency to source labour and always verifies the practices of agent

3.1.3. Corporate Social Responsibility Policy: Our policy reinforces our commitment. This policy is updated annually and demonstrates how we are making progress towards or achieving our goals and commitments

3.1.4. SOPS: Company SOPs including F39 Ethical, Anti-Competitive Behaviour & False Accounting

4. Due Diligence

4.1. We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

4.1.1. When onboarding new subcontractors' compliance to HOST and client policies and procedures are a mandatory requirement. Where the requirements of the subcontractor are greater than the requirements of HOST, the subcontractor's policy will remain. This will be checked for ongoing compliance with necessary audits and right to work checks

4.1.2. HOST only operates and works with approved vendors. A list of approved vendors is kept current and up to date and regularly reviewed

5. Training

- 5.1. We require all team members working within our organisation to complete training on modern slavery
- 5.2. Our modern slavery training covers:
 - 5.2.1. Purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
 - 5.2.2. How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
 - 5.2.3. How to identify the signs of slavery and human trafficking
 - 5.2.4. What initial steps should be taken if slavery or human trafficking is suspected
 - 5.2.5. How to escalate potential slavery or human trafficking issues to the relevant parties within our organisation
 - 5.2.6. What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative
 - 5.2.7. What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
 - 5.2.8. What steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains