

# PRINCIPAL

HOTEL COMPANY LTD

## SLAVERY & HUMAN TRAFFICKING TRANSPARENCY STATEMENT

Principal Hotel Company acknowledges its responsibilities under the Modern Slavery Act 2015, making a voluntary commitment to ensure acts of slavery, human trafficking, child and sexual exploitation do not occur across its operating businesses and those within its suppliers of goods and services. This statement relates to actions and activities during the financial ending 31<sup>st</sup> December 2016.

Principal Hotel Company Limited during the financial year operated 42 Hotels/Venues across two divisions, 'Principal' and 'De Vere'. The Group has a clear commitment to deliver excellence in hospitality, continuing our investment in our people, our services and our properties.

### **Policies & procedures relating to the prevention of Modern Slavery and Human Trafficking.**

As part of the Group's due diligence processes to avoid slavery and human trafficking, a number of policies and procedures have been reviewed and implemented. These include, but not limited to:

#### **a). Ethical Recruitment**

Requiring the HR teams and those colleagues who are delegated the responsibility for the recruitment of colleagues, to understand their responsibility correctly by carry out 'right to work' checks and therefore ensure legal compliance. This requires full ID checks to take place including passports and where relevant work permits.

As part of the Group's due diligence, all potential providers of agency workers are required to complete and sign a declaration confirming that they are fully compliant with the requirement of UK Immigration legislation and the Modern Slavery Act. This necessitates agency worker providers to respond to set questions and responses are assessed to ensure 100% compliance before approving providers of agency workers.

#### **b). Whistle Blowing**

The Company at all times conducts its business with the highest standards of integrity and honesty. It expects all colleagues to maintain the same standards in everything they do. Colleagues are therefore encouraged to report any wrongdoing by the Company or its colleagues that falls short of these business principles and to support this has introduced a totally confidential and independent whistleblowing call service, available to all colleagues.

#### **c) Management of suppliers to prevent Modern Slavery within the Supply Chain.**

All potential suppliers must complete a 'New Supplier Questionnaire' as part of the process to seek approval to supply the Group. This includes the requirement to confirm their compliance with the Modern Slavery Act. In addition potential suppliers must agree to the Group's right to inspect their premises, manufacture, processing and storage. Audits will be performed on the Groups behalf to review all aspects of the supply chain, including safety, working practices and other legal requirements.

Imported goods from sources from outside the UK and EU are potentially more at risk for slavery and human trafficking issues. The Procurement department for the Group constantly review the supply chain to evaluate such risks.

Specialist training has been provided for the Group Procurement team to ensure they can fully appreciate and fulfil their role in avoiding modern slavery and human trafficking within our supply chain.

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## Demonstrating Commitment

The Group recognise that Hotels may be used as temporary accommodation to support the exploitation of vulnerable adults and children. The Group has developed and cascaded a training programme to make colleagues aware of potential risks so that colleagues can demonstrate vigilance in spotting possible cases of slavery, human trafficking or sexual exploitation on our premises, by recognising the signs to look for and how to report such activities.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations. This includes, but is not limited to preventing of, the use of Company premises for the sexual exploitation of adults and children; recruitment of employees or agency workers via unauthorised agencies or subcontracted and the purchasing of goods or services from non-approved suppliers, exposing the Company to the potential risk of indirectly supporting unethical employment practices such as forced or bonded labour.

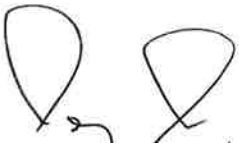
All colleagues are required to support the Group's commitment to Anti-Slavery & Human Trafficking prevention measures at all times. Since November 2016 this commitment has also become a condition of employment for all new HOD's, Managers & Executives of the Group. .

Further colleague information regarding the prevention of modern slavery and human trafficking is also outlined in our Colleague Handbook and Inspire Online our e-learning portal. .

The Company will not knowingly support or deal with any business involved in slavery human trafficking and child or sexual exploitation.

This policy statement has been reviewed and approved by the Board of Directors and will be reviewed and published annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2016.



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**Tony Troy**  
Chief Executive Officer  
Principal Hotel Company Ltd