

Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Hallmark Hotels Ltd (including all subsidiary company entities) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Hallmark Hotels Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

We are a UK based hospitality company with a broad portfolio of hotel outlets and external catering contractors. We operate a portfolio of 28 hotels based throughout the UK and directly owned by our parent company Topland Group of Companies with the business name being Hallmark Hotels LTD. Hallmark Hotels Ltd indirectly employs around 3,000 colleagues across our company entities who work across our Hotel outlets and Support Centre. Our supply chain activities can be split into two broad categories – Support Centre supply chains and hotel supply chains. Our support centre supply chains cover procurement for our support centre offices. These are mainly focussed on items such as technology and professional services. At the hotel level, supply chains cover procurement for all items required for running a hotel. These cover a wide range of items including food, linens, cleaning supplies and furniture. This procurement happens both at the local hotel level and, for some locations, via centralised purchasing arrangements that are available to our hotels. Our parent company will also have supply chains at different stages of their hotel's life-cycle, for instance at the construction stage for new build hotels or modifications to current hotels within the group.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our suppliers

Hallmark Hotels LTD operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Where our procurement process has been outsourced to a procurement broker we will always expect them to have completed the same acts of due diligence. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage
4. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement teams and operational teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if: • No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Working in partnership

Modern slavery is complex and we believe strongly that working together with others being our suppliers, service providers and our teams to identify risks and best practice will be the most effective way to bring change in this area. We allow all team members the access and freedom to report any act that they feel may be an indication to Modern Slavery or Human Trafficking. These reports will always be investigated at an internal level and escalated to external parties should we find evidence to support this.

Moving forwards

We believe that increased transparency in the way businesses are addressing these risks is an important step in efforts to combat the abuses of modern slavery. We recognise the role that businesses including Hallmark Hotels Ltd can play in this. This area aligns fully with our values as being “The Home of Great Hospitality”, as well as our longstanding commitment to

responsible business. Developing and enhancing our approach to human rights and combatting modern slavery will continue to be an important part of this.

This statement was correct at the time of publication and is subject to change and amendments where required.

Hallmark Hotels Ltd 5 Bankside, Crosfield Street, Warrington, WA1 1UP

<https://www.hallmarkhotels.co.uk/explore-hallmark-hotels/modern-slavery-statement/>