



Modern Slavery and Trafficking Statement

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Introduction

This statement sets out the steps Specialist Leisure Group has taken to prevent acts of modern slavery and human trafficking from occurring in its business and supply chain. This statement relates to actions and activities during the financial year 1 January 2018 to 31 December 2018.

The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisation

Specialist Leisure Group (comprising of Shearings Hotels Ltd, National Holidays Ltd, and Shearings Ltd) is a British hotel and leisure travel company specialising in escorted tours, short breaks, events and river cruises throughout the UK, Europe and worldwide. The Group has a diverse portfolio of owned and managed UK hotels and a collection of sector leading travel brands that offer holidays by coach, rail, river and air.

Our business depends on a reliable network of suppliers for services and products such as venues, hotels, transport, food and retail, in the UK and internationally.

To minimise the risk of slavery and human trafficking we:

- Contract large chains of hoteliers or accommodation services who are sourced via destination management companies, agents and inbound tour operators based in these destinations.
- Send risk assessment questionnaires to 3rd party operators reviewing health and safety. These have been adapted to include questions of slavery and human trafficking.
- Source services and parts overseas through reputable dealers.
- Undertake an interview and assessment process where practicable before contracts are entered into.
- Enter into food contracts through key suppliers; including requests to see their policies and statements regarding modern slavery and human trafficking.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that 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.

Our policies

The Whistleblowing Policy encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Our *Employee Code of Conduct* makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency. All agencies are vetted by the Group's HR department.

Serious violations of the organisation's *Supplier Code of Conduct* will lead to the termination of the business relationship.

Training and performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result we require those involved in the supply chain to complete training to ensure understanding of the basic principles of the Modern Slavery Act 2015 and the risks of modern slavery and human trafficking in our business. We are also evaluating all existing suppliers.

This statement has been approved by the organisation's executive committee and is for the year to 31 December 2019, pursuant to section 54 (1) of the Modern Slavery Act 2015.

Richard Calvert
Chief Executive Officer
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