

Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Arora Holdings Limited and its subsidiaries to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

Slavery and human trafficking are abuses of a person's freedoms and rights. They are however a growing issue across the world, in every region and every economy. We recognise that we have a responsibility to prevent modern slavery and human trafficking both within our business and our supply chain. We are committed to making a positive contribution to society by developing and implementing business practices that allow us to deliver financial success whilst conducting our business strategy and operations in a responsible and ethical manner.

Our business

Arora Group was founded in 1999. Our headquarters are located at London Heathrow and we currently employ around 2,000 people across our main trading businesses: Hotel Operations, Property Management, Construction and Facilities Management, all of which operate within the UK.

At our most recent financial year end in March 2017, we operated 8 hotels, managed various property assets and had worked on 6 construction projects across England, Wales and Scotland during the course of the previous year.

Our policies

We actively encourage working practices which have due regard for the need to reduce the risks of modern slavery and human trafficking both within our businesses and our supply chain. We expect our suppliers to adopt similar working practices. We are committed to the principle that all employees shall be free to choose their employment and shall not be forced to work against their will, and that there shall be no forced, bonded or involuntary prison labour or human trafficking.

For our employees, failure to adopt these working practices and adhere to the above principles may result in disciplinary action.

We also operate a whistle blowing policy, aimed at our employees, which encourages staff to report any wrongdoing, including human rights violations such as modern slavery or human trafficking. Any reports of this nature will be fully investigated and appropriate remedial actions taken. We also ensure that adequate and appropriate protection is provided to whistle-blowers.

In relation to our suppliers, we believe that transparency is vital to a successful business relationship. We are committed to building long-term relationships with suppliers and value open and honest communication with them. In the event of any failure to recognise the need to minimise the risks of modern slavery and human trafficking and to adopt working practices that reflect this, we would expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. If corrective action is not taken or if the supplier disregards our requests to remedy the issue, we reserve the right to terminate any agreements.

Our supply chain

Our supply chain includes over 2,000 suppliers covering food and beverage suppliers for our hotels, raw materials for our construction, as well as goods and services not for resale such as equipment used in our properties, point of sale materials, IT equipment, utilities and waste services, contractors building, repairing or cleaning our hotels, marketing, advertising, recruitment and training.

Our suppliers vary enormously in terms of their size and expertise and many of those will themselves be reliant on their own supply chain, potentially across many countries, in order to be able to supply relevant goods or services to us.

Current and proposed due diligence processes for modern slavery and human trafficking

We are developing a range of due diligence processes to enable us to identify and assess potential risk areas in our business and our supply chain.

By running many of our hotels as operated hotels we have optimum control of the work environment, including labour scheduling and pay rates, thus reducing the risks within our own business. Nevertheless, training will be delivered to appropriate individuals across the business to ensure that they are aware of the potential issues and are able to assess the risks in their area of responsibility.

We expect all major suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Significant suppliers and those in businesses perceived to be most at risk will be asked to confirm and evidence the arrangements they have in place. As set out above, we reserve the right to terminate any agreement should a supplier refuse to co-operate or if a supplier decides that compliance is impossible.

We also propose to update our supplier terms and conditions to require compliance with the Modern Slavery Act and to permit periodic and targeted audits of suppliers in this regard using a risk-based approach.

Our effectiveness in combating slavery and human trafficking

We understand that the risks of modern slavery and human trafficking are growing, and we will continue to develop our approach to mitigating this risk in the year ahead.

This statement was approved by the board of Arora Holdings Limited and its subsidiaries.

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