

MODERN SLAVERY STATEMENT

This statement is made by Apex Hotels Limited on behalf of itself and it's subsidiary companies ('Apex Hotels').

We are:

Apex Hotels Group operates 10 Hotels across London, Edinburgh, Glasgow, Dundee and Bath, and a Laundry facility operating in Livingston. This statement is made on behalf of Apex Hotels Group, only pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Apex Hotels' slavery and human trafficking statement. We are committed to ensuring that we conduct our business ethically and with integrity. We do not tolerate any forced or compulsory labour or human trafficking and are firmly committed to ensuring that no such behaviour takes place within the Apex Hotels group.

Our Supply Chain:

Apex Hotels Group has direct relationships with a number of primarily UK based suppliers offering a wide range of products and services.

Our supply chain includes:

- Food and beverage suppliers and hotel operating supplies
- Outsourced systems support and IT services
- Hotel equipment suppliers and maintenance
- Recruitment and training
- Building supplies and materials

Our commitment extends to our supply chain and our selection of business partners. Our supplier relationships are based on lawful, efficient, and fair practices. We expect our suppliers to operate within the law, adopting practices to treat workers fairly and provide a healthy and safe working environment. We will not knowingly use any suppliers that use forced labour and will only have relationships with suppliers who comply with all laws regarding slavery and human trafficking.

In addition, our suppliers are obliged to pass these requirements on to their subsequent suppliers too and we expect all of their suppliers to monitor their supply chains in order to eradicate modern slavery of any kind. Apex Hotels Group Procurement Department requires Modern Slavery Act Compliance statements from our supply chain before engaging in contractual trading.

Our Policy and Training:

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place within our business. This policy sits alongside our Whistleblowing Policy which provides a system for our employees to escalate slavery and human trafficking issues and breaches of our Group policies. Both policies are reviewed annually.

Modern Slavery training is provided to all new employees joining our organisation and we utilise SHIVA Foundation resources through our business.

Risk Assessment and Due Diligence:

As part of our initiative to identify, monitor and mitigate against industry risk, business transaction risk and recruitment risk, we nominate senior Directors within our business for responsibility for Employee Risk and Supply Chain Risk. We have in place policies and systems across our business to:

Identify inappropriate employment practice

- Identify, assess, and monitor other potential risk areas through our Modern
- Slavery Risk Assessment and our incident reporting processes
- Mitigate the risk of slavery and human trafficking occurring
- Protect whistle-blowers
- Investigate reports of Modern Slavery

We encourage anyone with information regarding modern slavery or human trafficking taking place within our organisation or within our supply chain to report this to our Risk and Compliance department by emailing alison.moir@apexhotels.co.uk or by contacting our HR support service number. We will continue to do everything we can to prevent modern slavery and human trafficking and highlight to our Employees how to identify human trafficking and forced labour issues.

Averil Wilson

Managing Director, Apex Hotels Group