

### **Modern Slavery Statement**

Axiom Hospitality Limited are fully committed to ethical and humane working practices and regards inhumane conditions such as slavery and exploitation as completely unacceptable.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

## Responsibility for the Policy

The Group Operations Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under their control comply with it.

The Group Operations Director with the support of the Finance Director and People & Culture Manager have primary responsibility for implementing this policy, monitoring its use and effectiveness. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and the issue of modern slavery in supply chains.

# **General Principles**

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards.

#### Prevention of Slavery and Human Trafficking in Axiom Hospitality

In order to detect and prevent acts of slavery within our business, we have a number of policies and practices in place including Eligibility and Right-to-Work Checks.

Axiom Hospitality will never knowingly accept food or other products from suppliers who exploit the people or natural resources of their environment. To this end, if Axiom Hospitality becomes aware of any concerns with one of our suppliers, we will investigate and determine whether these concerns are justified and take the appropriate action to address the issues. This could involve working with the supplier to agree an action plan to address the issues, delisting the supplier, and/or sourcing product from an alternative supplier, all dependant on the nature and severity of the concerns.

## **Policy Breach**

We expect any colleague who has concerns about any aspect of our work including our provisions for antislavery and human trafficking, both internally and within our supply chain, to disclose their concerns in accordance with the whistle-blowing policy, which is available on our HRIS system.

The whistle-blowing policy applies to all employees, casual workers, agency staff, contractors, subcontractors, agents, sponsors, suppliers or any other person associated with Axiom Hospitality hotels.



# **Periodic Policy Review**

Axiom Hospitality takes compliance with the Modern Slavery Act seriously and we work on the basis of continuous improvement. We will therefore review and update our anti-slavery and human trafficking systems on an annual basis or a required to make sure that they reflect any changes in legislation.

Signed:

Date: March 2023

Name: Alex Pritchard

On behalf of: Axiom Hospitality Limited