

Modern Slavery Statement

Clermont Hotel Group does not support and will not tolerate the use of slave labour or human trafficking in any circumstance and prohibits suppliers using, participating in or benefiting from any forms of forced, bonded, slave, compulsory or involuntary labour or any form of human trafficking.

Clermont Hotel Group

Clermont Hotel Group currently operates hotels under the Clermont (Upper Upscale) and Thistle (mid-market) brands as well as hotels in the luxury space – Royal Horseguards – and the lifestyle space – The Cumberland Hotel. With over 4000 rooms, 100+ event spaces, plus stylish bars and restaurants our hotels have plenty of space for everyone to meet, sleep, and dine. All kinds of extraordinary, for all kinds of people.

Clermont Hotel Group comprises the companies listed below. This statement is made on behalf of all of these entities:

Barbican Hotel (London) Limited
Bloomsbury Hotel (London) Limited
Clermont Hotel Group Limited
Clermont Hotel Holdings Limited
Clermont Hotel HR Limited
Clermont Hotel Management Limited
Euston Hotel (London) Limited
GLH IP Holdings Limited
Grand Imperial Grosvenor LLP
Heathrow Hotel (London) Limited
Hyde Park Hotel (London) Limited
Kensington Gardens Hotel (London) Limited
Marble Arch Hotel (London) Limited
Piccadilly Hotel (London) Limited
The Charing Cross Hotel Limited
The Cumberland Hotel (London) Limited
The Grosvenor Hotel Victoria Limited
The Royal Horseguards Hotel Limited
The Strathmore Hotel (Luton) Limited
The Tower Hotel (London) Limited
The Wiltshire Hotel (Swindon) Limited
Thistle Edinburgh Tenant Limited
Trafalgar Hotel (London) Limited

Our supply chains

Our main supply chains are:

- I. Hotel suppliers – these suppliers provide the goods and services needed to run a hotel and range from food and beverage, linen and cleaning supplies to fixtures, fittings, equipment and maintenance services
- II. Support suppliers - these suppliers provide items such as office supplies, IT support and systems, and professional and consultancy services.
- III. Employment agencies – we work with employment agencies that provide staff to work in our hotels and support offices.

Accountability for modern slavery risk management

We recognise that there are various ways that our business could be affected by modern slavery. The board of directors has overall responsibility for tackling modern slavery together with the following roles:

- I. The Group Head of Procurement has responsibility over our supply chain;
- II. The HR Director has responsibility over our team members; and
- III. The General Managers of the hotels are responsible for guests, supported by team members and our central support function.

Supplier due diligence

Our procurement team are responsible for assessing the suitability of our supply partners through a robust eProcurement supplier onboarding process.

When taking on new suppliers we undertake supplier due diligence, which includes engaging with potential suppliers to understand the actions taken by them to reduce the risk of slavery and human trafficking in their supply chains. Where appropriate, comprehensive questions are included as part of the tender process.

Supplier code of conduct

All suppliers are asked to accept our supplier code of conduct or have equivalents of their own in place. Our supplier code of conduct contains five key principles, the first one relating to human rights and labour conditions, which requires suppliers to abide by a policy which i) respects all human rights and ii) allows employees to be free to choose to work for their employer and to leave employment after they have given reasonable notice.

Supply contracts

Our standard contracts place obligations on suppliers to comply with applicable laws and regulations and, if our standard contracts are not used, we endeavour to contractually require suppliers to comply with applicable laws and regulations, which includes the Modern Slavery Act 2015.

Policies and training

Every team member at Clermont Hotel Group must act with honesty, integrity, loyalty and confidentiality. All team members are required to comply with all applicable legislative, regulatory and policy requirements, including our Modern Slavery Policy. All of our policies are regularly reviewed to ensure they remain fit for purpose.

We realise that awareness amongst team members will help us to identify and prevent modern slavery. All team members, whether based in the hotels or in our central support office, are trained on our Modern Slavery Policy and complete mandatory refresher training every year. This training explains what modern slavery is, how to identify signs of modern slavery and how to report any concerns. Training is conducted through our online platforms and employee completion rate is monitored and enforced.

Right to work checks

Potential team members are required to provide proof of eligibility to work in the UK before an employment contract is signed. If team member is unable to provide this, they cannot be employed. If an employee loses their right to work whilst in employment with Clermont Hotel Group, they must inform their line manager immediately and their employment will be terminated.

Whistleblowing

Clermont Hotel Group wishes to encourage an open and honest culture in its dealings and recognises that effective and honest communication is essential to its success. To assist with this, we have set up a confidential procedure to make it simple for any team member who is concerned about wrongdoing to do something about it. This includes any suspicion of modern slavery. Team members should email confidential@clermonthotel.group to report any concerns. Such emails will go directly to the HR Director and the Head of Audit and they will deal with any concerns raised sensitively.

Measuring performance

We will monitor any email sent to the whistleblowing email address and ensure that appropriate action is taken.

We monitor the employment practices of our high-risk suppliers, making this a standard agenda item for all contract management meetings and reviews.

Continual improvement

We are committed to taking appropriate steps to prevent modern slavery and will continue to monitor our policies and procedures to ensure they are adequate. This will include continuing to review suppliers and updating training where necessary, to ensure it remains current and appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and forms our slavery and human trafficking statement for the financial year ended 30 June 2024. This statement has been approved by Clermont Hotel Management Limited's board of directors, who have authorised the below names director to sign it on their behalf. This statement will be reviewed and updated annually.

Signature of Director:



Name of Director: Gavin Taylor

Date: 20/11/2024