

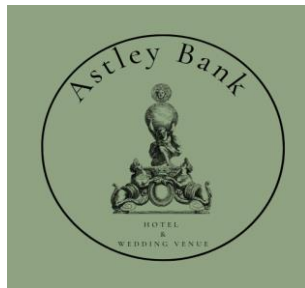
Modern Slavery Statement

Astley Bank Hotel is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of slavery and human trafficking taking place within the business or our supply chain.

This statement is prepared for the purposes of Section 54(1) of the Modern Slavery Act and forms our slavery and human trafficking statement. It takes into account the revised Government Guidance on supply chain transparency issued in 2017. Astley Bank Hotel is committed to adhering to the values outlined in this statement. The latter sets out the steps taken by Astley Bank Hotel to help prevent slavery and human trafficking within our company and/or its supply chain. We view the steps being taken as an evolving process; we will continue to monitor and review its risk profile to strengthen and improve its practices moving forwards.

Our Supply Chains

We select our suppliers and business partners carefully and, when possible, we conduct due diligence on them, so that we are comfortable that we are in business with trusted partners and known, reputable parties who effect business in full compliance with local laws and best practices. We encourage all of our suppliers to comply with our policies or we expect that they will have similar policies in place. Astley Bank Hotel expects all of its suppliers, contractors, and service providers to



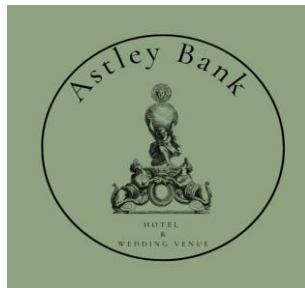
act ethically and with integrity and to have in operation effective systems, safeguards, and controls to ensure modern slavery is not taking place anywhere in their own business or supply chains. As a result, we operate and maintain preferred suppliers' lists.

Before any supplier, contractor, or service provider is approved, Astley Bank Hotel carries out appropriate due diligence, including carrying out online searches to ensure that an organisation has not been convicted of any offences, including but not limited to, offences pertaining to modern slavery whether through human trafficking, slavery, child labour, or otherwise. This organisation is also expected to confirm that they understand and comply with the Modern Slavery Act 2015.

Our Policies on Slavery and Human Trafficking

To help prevent modern slavery or human trafficking in our business and supply chain, we have adopted an Anti-Slavery Policy, which reflects our commitment to acting ethically and with integrity, and to implementing effective systems and controls to help ensure slavery and human trafficking is not taking place in our business and supply chain. We will constantly monitor, revisit, and update this policy, as necessary.

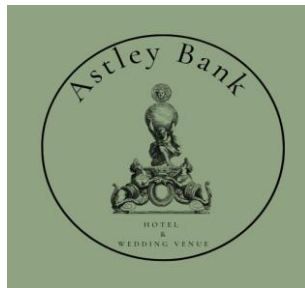
We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies include:



- **Anti-Slavery Policy:** This policy sets out the company's stance on modern slavery and explains how employees can identify and instances of this and where they can go for help.
- **(Employee) Code of Conduct:** The Code of Conduct explains the way we behave as a company and details the core values and duties that we expect all stakeholders and employees to adhere to. All employees are responsible for reading, understanding, and complying with the principles as outlined in the Code of Conduct. Our Code of Conduct is covered in the Employee Handbook, which is given to employees during their induction.
- **Reporting concerns:** Employees are encouraged to report genuine concerns that they may have over possible violations of the Code of Conduct or any other concerns that they feel are unlawful or unethical. Such concerns will be kept confidential by us to the extent that the law permits.
- **Recruitment Policy:** Our recruitment Policy outlines the process to follow when recruiting, including a perspective employee's eligibility to work in the UK.

Due Diligence Processes for Modern Slavery and Human Trafficking

As part of Astley Bank Hotel's commitment to identify and mitigate modern slavery risks, we will continue to build long-standing relationships with our suppliers and make clear our expectations of them and their business conduct. We primarily address risk by reviewing internal controls and training, and by actively working with reputable suppliers that we expect will have suitable anti-slavery and human trafficking policies and procedures in place. We expect every entity in the supply



chain to, at the very least, adopt ‘one-up’ due diligence on the next link in the supply chain. It is not practical for us to have a direct relationship with all of the links in the supply chain, such as the ultimate producer, manufacturer, or service provider. Nonetheless, we consider our approach to be reasonable and proportionate to tackle the risks. The tendering of new contracts carries an obligation that suppliers comply with the Modern Slavery Act 2015. To ensure an understanding of potential risks of modern slavery in delivering our services and managing our supply chain, we do and will continue to provide training to our employees. We operate to high ethical standards and we ensure equal treatment of employees to prevent discrimination.

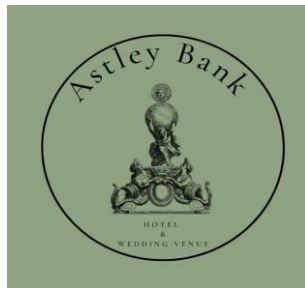
Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, we continue to provide training for our employees in order that they can identify potential signs of modern slavery, human trafficking, or child grooming and sexual exploitation and, if necessary, report them without fear of penalty.

Measuring Effectiveness

Astley Bank Hotel uses the following measures, amongst others, to monitor and assess how effective we have been as a business at ensuring that modern slavery and human trafficking is not taking place within our business or supply chain:

- Hotel Audits reviewing the appropriateness of existing products



- The use of effective labour monitoring procedures and payroll systems
- An assessment of the level of communication and personal contact with the next link in the supply chain, in order to ensure that we have their full understanding and compliance with the Modern Slavery Act 2015 and our expectations of them in relation to it.

Corporate Responsibility

Astley Bank Hotel believes in increased transparency in how businesses are playing their part in preventing modern slavery and human trafficking. We will continue to monitor the effectiveness of our compliance programme and, if necessary, we will publish an updated version of our Modern Slavery Statement. Responsibility for Astley Bank Hotel's compliance with the Modern Slavery Act 2015 lies on an operational basis with its Directors and its General Manager. This statement is issued with the approval and consent of the Directors and the General Manager of Astley Bank Hotel, who have duly authorised the below named signatory to sign it on their behalf.

A handwritten signature in black ink, appearing to read "E. Georghiadis", is written over a horizontal line.

Stath Georghiadis
General Manager
Astley Bank Hotel

For and on behalf of Astley Bank Hotel

Dated 01 May 2022