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## **ABOUT ATLAS HOTELS GROUP**

Atlas Hotels Group is the parent company of the individual companies that own and / or operate 58 hotels across the UK, employing in excess of 1,000 employees.

We believe we have a responsibility to manage our business so that it impacts positively on those who we interact with. This statement sets out the steps taken, and those which Atlas Hotels Group intends to take in the future, to prevent modern slavery and human trafficking in our supply chains or in any part of our business.

This statement is published in line with the Modern Slavery Act 2015 ("MSA").

## **SUPPLY CHAIN**

Our supply chain includes suppliers of goods and services, almost exclusively based in the UK with our labour force comprising employees and temporary workers when required.

## **POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

## **RISK ASSESSMENT, PREVENTION, MITIGATION**

As part of our initiative to identify and mitigate risk we assess potential risk areas in our supply chain through:

- Risk reviewing suppliers based on spend, location and type of product or service provided
- Risk assessing suppliers on size and type of organisation ranging from large corporates to small independents
- Encourage reporting of concerns through our Whistleblowing Policies
- Audit suppliers' compliance with MSA 2015 by requesting copies of their MSA statement

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and business, we provide annual training to our staff.

## MONITORING EFFECTIVENESS IN COMBATting MODERN SLAVERY

We will measure the effectiveness of our policy through:

- Audits of our supply chain and supplier contracts
- Annual risk assessments
- Monitor compliance with MSA 2015 training

## FUTHER STEPS

Further areas for development have been identified as:

- Develop a formal Anti-Slavery Policy
- Ensuring anti-slavery clauses are contained within all key supplier contracts, inclusive of contract novated through any asset acquisitions
- Continuing to review our training programme compliance

This statement has been approved by the Board of Directors

Signed Jan Qi

Date 4/7/2022