

Supplier Code of Conduct

ABOUT ATLAS HOTELS GROUP

Atlas Hotels Group is the parent company of individual companies that own and/or operate 58 hotels across the UK, with more than 2,400 employees.

ABOUT THIS CODE

At Atlas Hotels we uphold high ethical and professional standards and believe in managing our business to have a positive impact. We are committed to operating responsibly and ask our supply chain and suppliers to embrace our values. These principles include corporate integrity, responsible sourcing, and the safety and well-being of workers. This Code outlines the minimum standards we expect from our suppliers. In the instance of non-compliance, we expect suppliers to be transparent and communicate risks to us.

HUMAN RIGHTS

We expect our suppliers to follow all relevant human rights and employment laws, including the principles outlined in the UN Convention on Human Rights. Suppliers must ensure a working environment free from harassment including sexual harassment, exploitation, abuse, threats, verbal abuse, and harsh treatment. Suppliers should also have a formal whistleblowing policy that protects employees who report any past, present, or future incidents or wrongdoing, in line with local laws and regulations.

Suppliers, no matter where they are located, must ensure there is no slavery, forced or child labour, or human trafficking in their business or supply chain. All employment should be voluntary, and workers should be able to leave their jobs with reasonable notice at any time.

DIVERSITY, EQUALITY AND INCLUSION

Atlas Hotels promotes a diverse, equal, and inclusive working culture where everyone feels valued and respected and in turn, we expect our suppliers to treat all employees with dignity and respect. This means aiming to employ diverse teams that reflect the societies in which they operate and ensuring equal and inclusive access to opportunities and resources for all, including those who might otherwise be excluded or marginalised due to socio-economic circumstances, gender, race, colour, disability, neurodiversity, age, nationality, union affiliation, or religion.

LABOUR RIGHTS

We expect our suppliers to treat workers with dignity, respect their workers' rights and comply with all relevant labour laws. If no such laws exist, they should follow International Labour Organization (ILO) standards to ensure:

- No forced or child labour in the supply chain
- Workers can freely associate and bargain collectively
- Working conditions are safe and clean
- Fair pay, reasonable working hours, and adequate rest periods
- No harassment or harsh treatment
- Ethical recruitment policies

We encourage suppliers to communicate working hours, freedom of association rights, collective bargaining rights, remuneration, health and safety requirements and compliance with ILO standards to all employees. Suppliers should provide workers with clear employment contracts which detail working hours, pay and conditions of employment.

Suppliers should also review and address any potential negative impacts their activities may have on local communities, providing employees and managers involved in supply chain management with training to prevent labour abuses and discrimination.

COMPLIANCE WITH LAWS AND REGULATIONS

We expect our suppliers to follow all relevant laws and regulations in every location where they operate and must not engage in any illegal or unethical activities.

HEALTH AND SAFETY

Atlas Hotels is committed to providing a safe and healthy working environment and suppliers must ensure they adhere to all required health and safety regulations within the territories they operate in. We expect suppliers to have worker risk assessments in place, and policies that align with industry best practices.

DATA PROTECTION

Suppliers should ensure the secure retention of accurate business records for the legally required period. They should comply with laws and directives on protecting, transferring, accessing, and storing personal information. This includes the General Data Protection Regulation (GDPR), the Data Protection Act 2018, and similar laws in other regions.

ENVIRONMENTAL SUSTAINABILITY

Atlas Hotels is dedicated to developing a sustainable business and seeks to minimise greenhouse gas emissions, single-use plastics, waste disposal, chemicals and toxic materials, water, and energy in its operations.

We expect suppliers to do the same and at a minimum, monitor, record, and minimise emissions they directly control (scopes 1 and 2). We may wish suppliers to provide Scope 1 & 2 data to Atlas Hotels to support our own emissions measurement and reporting.

Atlas Hotels expects its suppliers to follow all environmental laws and regulations to help protect the environment. They should have processes in place to minimise the environmental impact of their designs, operations, manufacturing, and waste. We encourage suppliers to consider emissions reduction strategies that align with Net Zero by 2050.

AVOIDING CONFLICTS OF INTEREST

A conflict of interest happens when an individual's personal interests clash with the interests of Atlas Hotels. We expect our suppliers to always identify and steer clear of situations that could cause a real or potential conflict of interest when working with Atlas Hotels or our clients. Suppliers must voluntarily declare any connections, relationships, or activities which create or appear to create a conflict of interest.

ANTI-CORRUPTION & BRIBERY

Atlas Hotels operates a zero-tolerance policy for corruption and bribery. Suppliers should conduct all business dealings honestly and transparently, following all relevant anti-bribery,

anti-lobbying, anti-money laundering and anti-corruption laws and regulations, including the UK Bribery Act 2010.

REPORTING CONCERNS

To discuss or report any concerns, please contact us via email: purchasing@atlashotels.co.uk

REVIEW & AUDIT

Atlas Hotels may wish to request evidence or perform audits of suppliers to ensure compliance with this Code. The Supplier Code of Conduct may be amended from time to time. The latest version will be available on the Atlas Hotels website.