



# Supplier Code of Conduct

## About Atlas Hotels Group

Atlas Hotels Group (hereinafter referred to as Atlas Hotels) is the parent company of individual companies that own and/or operate 59 hotels across the UK and one hotel in Europe, employing around 2,500 people.

## 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 and their workers (who should be made aware of this Code by their employer, the supplier). 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 and all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of its supply chain

Suppliers must ensure a working environment free from harassment, including sexual harassment, exploitation, abuse, threats, verbal abuse, and harsh treatment. The Supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force, including but not limited to, the Modern Slavery Act 2015, in any part of its supply chain. This includes, but is not limited to, not supporting, engaging, or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour.

Atlas Hotels does not tolerate any form of harassment. Harassment includes any unwanted conduct related to a protected characteristic (such as age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation) or of a sexual nature, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Our suppliers must take all reasonable steps to prevent any form of harassment from occurring in the workplace, including as part of the service provided to Atlas Hotels Group, and provide evidence of any such measures to Atlas Hotels Group as soon as reasonably practicable (and no later than 7 days) on request.

Our suppliers must take all reasonable steps to prevent the harassment of any individual engaged in work for or on behalf of our suppliers by third parties, including but not limited to customers, clients, service users, contractors, subcontractors, or members of the public.



Our suppliers should have in place clear policies and procedures for reporting, investigating, and responding to allegations of third-party harassment. Our suppliers must also ensure that all personnel are aware of these policies and are trained to implement them effectively. Failure to take reasonable steps to prevent third-party harassment may result in action being taken in accordance with this Code and applicable law.

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, gender reassignment, marriage or civil partnership, pregnancy and maternity, sexual orientation, race, colour, disability, neurodiversity, age, nationality, union affiliation, religion and/or belief.

### **Employment Rights**

We expect our suppliers to treat workers with dignity, respect their workers' rights and comply with all relevant employment legislation. If no such laws exist, they should follow International Labour Organisation (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. Suppliers 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 health and safety regulations required within the territories they operate. We expect suppliers to have worker risk assessments in place, and policies that align with industry best practices.

Suppliers shall provide a safe, healthy, and sanitary working environment and comply with UK health and safety laws and any other relevant laws where they operate. This includes, but is not limited to, implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries. Where such hazards cannot be adequately prevented or controlled, the Supplier shall provide workers with appropriate personal protective equipment to protect against hazards typically encountered in that scope of work.

## **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, processing, transferring, accessing, and storing personal information. This includes the UK/ EU General Data Protection Regulation (GDPR), the Data Protection Act 2018, and similar laws in other regions.

The Supplier shall have in place appropriate measures to:

- (a) protect the integrity and confidentiality of information (including information belonging to or supplied by Atlas Hotels) held on its systems (which include physical and online or electronic systems); and
- (b) ensure that there is no unauthorised access to the information by third parties, including its Representatives.

## **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). From time to time, we may request that suppliers provide their Scopes 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 relating to (but not limited to) climate change, waste disposal, emissions, discharges and the handling of hazardous and toxic materials.

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 and 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 on [purchasing@atlashotels.co.uk](mailto:purchasing@atlashotels.co.uk)

### **Review and Audit**

Atlas Hotels may wish to request evidence or perform audits of suppliers to ensure compliance with this Code. We will request all new suppliers to acknowledge and agree to the contents of this Code before we commence a working relationship. Current suppliers will be asked to acknowledge and agree to the contents of this Code on an annual basis. The Supplier Code of Conduct may be amended from time to time. The latest version will be available on the Atlas Hotels website.

Failure to comply with the Code may result in termination of the business relationship (including any contracts) and the award of any future contracts