



## **Kingsmills Hotel Modern Slavery Statement**

### **Policy statement**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

We at the Kingsmills Hotel have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity and transparency throughout our business operations and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or in any of our supply chains, consistent with its obligations under the Modern Slavery Act 2015.

We also demand the same high standards from all of our suppliers, contractors and other business partners, and expect that the same standards are maintained further down our supply chain.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment.

In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, we accept that we have a responsibility through practical and reasonable due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Kingsmills Hotel or on our behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

### **Responsibility for the policy**

Our Board of Directors has overall responsibility for ensuring that this policy complies with our legal and ethical obligations. Our Operations Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery.



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Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

## **Compliance**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains, whether in the UK or abroad, is the responsibility of all those working at the Kingsmills Hotel or under our control. These individuals are required to avoid any activity that might lead to a breach of this policy.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

## **Training and communication**

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, is provided to our employees as necessary, so that they gain education on identifying exploitation, modern slavery and how to report suspected cases.

Furthermore, our zero tolerance approach to modern slavery is communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

## **Breach of the policy**

Any employee who breaches this zero tolerance policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

We may terminate our commercial relationship with suppliers, contractors and other business partners if they are identified to be in breach of this policy and/or are found to have been involved in modern slavery.

**A N Story**  
**CEO**

**23<sup>rd</sup> November 2021**