



## Modern Slavery Act 2015 Statement

### MODERN SLAVERY STATEMENT 2017 / 2018

VUR Village Trading No 1 Limited ("**Village**") is publishing this statement in compliance with Section 54 of the Modern Slavery Act 2015.

This statement is made for the financial year ending 2017 and details the steps taken by Village during this year.

#### ORGANISATIONAL RESPONSIBILITY

##### Organisational Structure

Village is part of the VUR group (the "**Group**") and our ultimate parent company is VUR Holdings (UK) Ltd ("**Holding Company**"), which has its head office in the United Kingdom. This statement is made by Village as the company that actively carries out business in the UK on behalf of the Group.

Village is a UK-based company operating 29 Hotels throughout the UK. We employ around 4,000 employees. Our hotels provide full hotel services including bedrooms, spas and leisure and gym facilities with significant food and beverage offerings.

The Group has an anticipated annual worldwide turnover of £200 million in 2018 (all from within the UK).

##### Responsibility

We recognise that although slavery, servitude, forced labour and human trafficking ("**Modern Slavery**"), is illegal it remains a growing issue in the UK. In an increasingly global marketplace, we also recognise that all businesses have a responsibility to understand whether modern slavery and human trafficking is taking place within their businesses and supply chains and this is a responsibility we take seriously.

We are committed to making meaningful and long term improvements to workers' employment and workplace conditions including but not limited to the prevention of forced, bonded and trafficked labour. We do this through our policies and

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governance, which are supported by a committed organisation and our leadership.

We also recognise that the hospitality industry can be at a higher risk of exposure to Modern Slavery for the following reasons:

- having a high percentage of staff who are from overseas;
- having a transient workforce;
- having a diverse supply chain.

### SUPPLY CHAIN

We procure goods and services directly from over 1000 first tier UK based suppliers in three main areas; Furniture, fixtures and equipment, food and beverage and operational supplies (goods not for re-sale).

We have contractual relationships with all of our suppliers and a dedicated procurement department to oversee the instruction of major supplier agreements and ensure that adequate procedures are in place.

We subcontract general maintenance and construction works services to a number of small providers in the UK. When building a new hotel we currently contract with one main UK based contractor who will then subcontract elements of the construction work.

We have a number of low tier indirect suppliers throughout the world, primarily related to our food and beverage offering.

We employ the majority of our workforce directly; we have a small number of independent agents working for Village. These independent agents tend to be IT consultants (working centrally) or personal trainers (based in the gym facilities at our hotels). All independent agents are contracted with directly.

We have two franchise arrangements operating within Village, both of which are under a contractual arrangement.

### OUR POLICIES

We recognise that effective policies are crucial for combatting Modern Slavery. We have an Anti-slavery and Human Trafficking Policy in place that sets out our

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overall approach to Modern Slavery at Village. We are committed to ensuring we are not supplied by anyone who engages in human trafficking and modern slavery.

Our Right to Work Policy and Recruitment Policy are followed to ensure, as far as possible, that migrant workers are not exposed to exploitation and that the business is not exposed to the fraudulent recruitment of employees.

We also operate a Whistleblowing Policy aimed at employees which encourages staff to report any wrongdoing. We intend to extend this policy to our wider supply chain.

General Counsel has overall responsibility for our Modern Slavery policies.

### RISK MONITORING AND COMPLIANCE

In 2017 / 2018 we sought to identify and address risks of Modern Slavery in our supply chain and we have:

- Carried out a first tier risk supplier mapping exercise in order to identify suppliers that fall within an area that is at high risk of Modern Slavery, and we have addressed Modern Slavery with these suppliers by requesting copies of their policies and procedures and advising them that there will be an audit trail in place over the next year for dealing with compliance.
- Addressed Modern Slavery as a formal business risk and put in place a mitigation plan that will be reviewed at quarterly meetings and owned by Heads of Departments within the business who will manage those mitigation plans.
- Reviewed our procurement processes to identify Modern Slavery as a risk to be identified and assessed on supplier audits.
- Ensured the Right to Work policy is followed with strict compliance.
- Reviewed our policies on Modern Slavery and considered implementation.

### STEPS TAKEN IN 2017 / 2018

In 2017 / 2018 we have taken the following steps:

- Implemented a supplier code of conduct with a particular focus on areas that are more susceptible to Modern Slavery.
- Produced quarterly reports to the Board assessing the risks from suppliers, employees and any other areas which could be affected by Modern Slavery

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- Included training on the risks of Modern Slavery into our induction for Senior Roles.
- Reviewed our recruitment process considering Modern Slavery as a risk.
- Mapped our employee's countries of origin to identify which geographic locations within our business are more susceptible to Modern Slavery.
- Engaged with the Gangmasters and Labour Abuse Authority (GLAA) to develop hotel specific guidance for employees and the potential exposure to Modern Slavery within hospitality.
- Shared best practice and the future of Modern Slavery within hospitality at a roundtable event for hospitality.

During 2018 / 2019 we will:

- Produce and develop a specific employee code of conduct which will clearly set out our approach to Modern Slavery and communicate to the wider business and to our suppliers how it can be identified and how we intend to deal with it. This was initially sought to be addressed in 2017, but after undertaking work with the GLAA we wanted a code to be launched when a clear process of reporting has been developed.
- Continuously engage with the GLAA to provide and develop training that is specific to our business during 2018 / 2019.
- Implement an online training tool for all employees to allow them to understand that Modern Slavery is a risk within hospitality.

Carry out risk assessments and monitor our supplier tiers and carry out audits.

### BOARD APPROVAL

This statement has been approved by the Board of VUR Village Trading No.1 Limited and the Board of VUR Holdings (UK) Limited and is signed by Gary Davis as Director of VUR Village Trading No.1 Limited.



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Gary Davis

**CHAIRMAN**