



Hastings Hotels Group Limited Modern Slavery Act Transparency Statement (Financial Year 19/20)

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as debt bondage, forced and compulsory labour and human trafficking. These acts all involve the deprivation of a person's rights and liberty in order to exploit them for personal or commercial gain. Hastings Hotels Group Limited ('**Hastings Hotels**' and '**the Group**') condemns any form of modern slavery.

About Hastings Hotels

Hastings Hotels consists of 7 hotels and resorts in Northern Ireland. The business relies on the services of around 1,000 workers. Hastings Hotels is the non-trading holding company of Moyola (Cellars) Limited ('**Moyola**'). Both Hastings Hotels and Moyola, individually or collectively meet the turnover threshold under the Modern Slavery Act 2015 (the **Act**) and seek to comply with their obligations in respect of same.

Hastings Hotels recognises that modern slavery is not an issue confined to the overseas hospitality sector. In particular, Hastings Hotels recognises that the risks can arise from the use of foreign and migrant labour, and from supply chains both in the UK and overseas.

As Hastings Hotels is the non-trading holding company of Moyola, it is Moyola's supply chain which currently makes up the bulk of suppliers. Hastings Hotels and Moyola's combined supply chain includes but is not limited to:

- Textile manufacturers;
- Wholesale food and drink producers; and
- Furniture manufacturers.

Our Policies and Procedures

In 2020 Hastings Hotels worked in conjunction with external advisors to review all its policies and procedures, including its modern slavery and whistleblowing policies. These policies have been updated and re-issued to staff to ensure they are aware of the businesses' obligations under Act and who to report any concerns or suspicions regarding modern slavery within the business or its supply chains. These policies are issued to existing and new staff and Hastings Hotels is committed to complying with these policies.

Modern Slavery Risk Management

As identified above, Hastings Hotels recognises that the biggest risk of modern slavery could occur in the recruitment of its own staff and in the supply of textile materials. To manage the risk in its recruitment procedures, the HR department for Hastings Hotels carry out checks on each member of staff's ID and remain live to the issue of control for the purpose of modern slavery. Additionally, to manage risk in our supply chain we are committed to conducting further due diligence on our suppliers as detailed below.

Due Diligence

In the financial year 2019/20 Hastings Hotels maintained accurate records in relation to our most recent supply chain audit and sought external advice in relation to expanding this supply chain audit. A supply chain audit was completed in Q1 of 2021 and we seek to diversify and expand this audit in the coming years to enhance compliance annually.

Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains

We are confident that our staff are aware of how to report any concerns they have in relation to slavery and human trafficking as each member of staff has access to these policies and procedures in the Staff Handbook. If we receive any

report or concern in relation to modern slavery, we are committed to fully investigating this matter and taking the appropriate action to protect any individual at risk.

Training

In Q1 of 2021, the Board of Directors at Hastings Hotels completed a training programme in relation to modern slavery and our individual and collective responsibilities. That training was carried out by external advisors and will help to ensure that we meet our obligations, and our supply chain does the same. We now intend to roll similar training out to the various levels of staff at each of our 7 sites.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Hastings Hotels' slavery and human trafficking statement for the financial year ending 2020. Please note that we have included Q1 of 2021 within this reporting period so that Hastings Hotels will now report in accordance with the Government's new reporting period.

A handwritten signature in black ink that reads "Howard Hastings". The signature is written in a cursive, flowing style.

Howard Hastings

25th March 2021

This statement was approved by the Board of Directors on 25th March 2021