



Modern Slavery Act 2015 Statement

MODERN SLAVERY STATEMENT 2018 / 2019

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 2018 and details the steps taken by Village during this year.

ORGANISATIONAL RESPONSIBILITY

Organisational Structure

Village is part of the VUR group (the "**Group**") and includes subsidiary company VUR Investment (UK) Limited; 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 30 Hotels throughout the UK. We employ around 4,600 employees. Our hotels provide full hotel services including bedrooms, spas and leisure and gym facilities and a business club with significant food and beverage offerings.

The Group has an anticipated annual worldwide turnover of £220 million in 2019 (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

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forced, bonded and trafficked labour. We do this through our policies and 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.

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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 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 2018 / 2019 we continued to address risks of Modern Slavery in our business and in our supply chain and we have:

- Continued to monitor our first tier risk suppliers to identify any new suppliers that fall within an area that is at high risk of Modern Slavery, and we have continued to address Modern Slavery with these suppliers by requesting copies of their policies and procedures and carrying out audits. Continued to address Modern Slavery as a formal business risk and consider further ways that it can be successfully addressed, which has included further on-site training for specific job roles.
- Continued to monitor and ensure that our Right to Work policy is followed with strict compliance.

STEPS TAKEN IN 2018 / 2019

In 2018 / 2019 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
- Provided refresher training to the Executive Team and continued to include training on the risk of Modern Slavery into our induction for Senior Roles.

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- Continued to monitor our recruitment process considering Modern Slavery as a risk.
- Received hospitality specific training from the Gangmasters and Labour Abuse Authority (GLAA) to allow us to continue to develop hotel specific guidance for employees and identify the potential exposure to Modern Slavery within hospitality.
- Created a successful data capture process (as part of GDPR) to allow us to secure data and provide it to the authorities in potential cases of Modern Slavery.
- Provided employees with a central contact email to report any concerns about Modern Slavery within the business. This central contact email is monitored by General Counsel to ensure reporting is sufficient for the GLAA.
- Implemented online training for all employees to allow them to understand that Modern Slavery is a risk within hospitality
- Our General Counsel is an active participant in the round table discussions with the GLAA working to develop and implement a protocol for the hospitality industry as a whole.

During 2019 / 2020 we will:

- Continue to engage with the GLAA to implement any recommendations that arise from the hospitality protocol and ensure they are included in our business during 2019 / 2020
- Review and develop our current practices to ensure that a policy identifying Modern Slavery is being implemented by all General Managers across all of our hotels in a consistent way.
- To develop an Ethical Trade Policy that is in line with our values on Modern Slavery.

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- 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**