



## Modern Slavery Act 2015 Statement

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 2022 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 Village Properties 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 33 Hotels throughout the UK. We employ over 4,500 employees. Our hotels provide full hotel services including bedrooms, and a full leisure and gym and a business club with significant food and beverage offerings.

The Group has an anticipated annual worldwide turnover of over £227m in 2022 (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 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 resale).

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 one franchise arrangement operating within Village that is 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 overall approach to Modern Slavery at Village. We also have in place an Ethical Trade Policy that we communicate to our high value / high risk suppliers. 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 2022 we continued to address risks of Modern Slavery in our business and it is identified as a dedicated risk in the business

In our supply chain we 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.

We continued to monitor and ensure that our Right to Work policy is followed with strict compliance.

## **STEPS TAKEN IN 2022**

In 2022 we continued to keep Modern Slavery on the agenda of the Executive Team and ensured that it was part of our induction for Senior Roles.

We continued to monitor our recruitment process considering Modern Slavery as a risk.

We continued to use 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 and provide 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.

In developing our ESG initiatives we have taken Modern Slavery awareness and compliance as a central part of both our social and our governance initiatives to ensure it is given the significance it needs.

### **During 2023 we will:**

Continue to 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.

Ensure that the governance of Modern Slavery is sufficient within the company.

## **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 VUR Village Properties Limited and is signed by Gary Davis as Director of VUR Village Trading No.1 Limited.



Gary Davis

**CEO**