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## HICP LIMITED MODERN SLAVERY STATEMENT

This is the Modern Slavery Statement of HICP Limited ("HICP") for the financial year ending 31 March 2026, published in accordance with section 54 of the Modern Slavery Act 2015 (the "Act").

The Act creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). HICP appreciates that the hospitality sector presents risks from a modern slavery perspective. HICP is opposed to all forms of modern slavery and understands that it can play an important role in helping overcome modern slavery and protecting against other human rights abuses, with policies and procedures in place to address the risks, as described below.

### Our business and supply chains

HICP operates hotels in various locations in the UK, which provide accommodation, food and beverage, conference and events services and leisure clubs. HICP employs 883 staff. In the financial year to 31 March 2026, HICP operated the following hotels:

- Holiday Inn London Gatwick Airport
- Holiday Inn Hemel Hempstead
- voco Southampton
- Holiday Inn Reading South
- Holiday Inn Farnborough
- Crowne Plaza Leeds
- Holiday Inn Aylesbury
- voco Fareham-Solent
- Holiday Inn London Bexley
- Holiday Inn Gloucester-Cheltenham
- Holiday Inn Coventry
- Holiday Inn High Wycombe
- Holiday Inn Leicester
- Holiday Inn Hull Marina
- Courtyard by Marriott Edinburgh.
- Holiday Inn Southampton-Eastleigh

The above hotels are licensed and operated under the InterContinental Hotels Group ("IHG") and Marriott International franchises and, as a result, HICP is committed to implementing and complying with the policies and procedures of IHG and Marriott. Policies of IHG relevant to modern slavery including IHG's Code of Conduct, Human Rights Policy, Supplier Code of Conduct and Modern Slavery Statement can be found [Here](#). Marriott's policies relevant to Modern Slavery can be found [Here](#). Marriott's Supplier Code of Conduct can be found [Here](#).

Valor Hospitality Europe Limited ("Valor"), has taken steps to reduce the risk of modern slavery existing in HICP's business and supply chains. Valor is not itself obliged to publish a Modern Slavery Statement. However, it operates under the compliance steps recorded in this statement.

HICP has supplier relationships with external businesses to support the running of the hotels as follows:

- An arrangement with Valor to manage the hotels on behalf of HICP Limited,
- Arrangements for the supply of goods and services (including some provision through contractors) to the hotels; and
- Arrangements to supply agency workers to supplement hotel staffing needs.

## Our actions in respect of Modern Slavery

In the financial year 1 April 2025 to 31 March 2026, Valor on behalf of HICP has continued to maintain and enhance its modern slavery compliance programme. In the last financial year, HICP and Valor have focused on the following steps to reduce the risk of modern slavery existing in the business and its supply chains:

- Continuing its policy confirming a zero-tolerance stance to all forms of modern slavery activities occurring in its business and / or supply chains. This is endorsed in our Team Member Handbook.
- An updated poster advising of the signs to look for has been created for display on digital noticeboards in Team Member areas.
- Cascading annual online training and awareness messages via Workvivo (our internal communications platform) to our team to maintain awareness of modern slavery risks in our business.
- Continuing the transition of all core suppliers onto the OneTrust system where their modern slavery credentials can be verified. 522 or 85% of core suppliers are registered and verified.
- Continuing regular quarterly meetings of the Modern Slavery Project Group where:
  - The policies and procedures in place to monitor areas of the business and supply chains which present an increased risk of modern slavery occurring, are reviewed, and assessed for continued suitability.
  - Any incidents or near misses are reviewed and corrective action advised
  - Government advice is reviewed and incorporated where appropriate
  - Local supplier verification documentation is reviewed
- Maintaining a well-advertised and easily accessible Whistleblowing helpline for reporting of any modern slavery related concerns.
- Customised modern slavery risk assessments have been put in place at all hotels. They are logged on Riskproof (H&S platform). Each hotel will be notified by the system at the relevant annual date that their risk assessment is due for review.
- New "How To" training cards hosted on our Learning Management System (LMS) have been created for Front Office, including the need to be vigilant for signs of modern slavery and the legal requirement to check the passports of non-UK citizens at check-in. This training will be issued to all new starters from 1 May 2026.
- Issuing of guidelines for hotels when using local vendors, high-street stores, and local service providers, along with an assessment form to assist in identifying any potential modern slavery risks within those businesses and seeking the confirmation of those suppliers that they agree to adopt Valor's stance on modern slavery. This is verified during the hotel compliance audits. Recent audits indicate 96 local suppliers have been asked to complete and comply with a modern slavery assessment document. Work will continue to ensure all relevant suppliers are identified.
- New General Managers have been briefed on this process, and a refresher issued to all General Managers via our People & Culture monthly update.
- A new flowchart has been created to clarify the process of verification and supporting documentation required from each type of supplier in respect of modern slavery.
- Where the use of agencies to supply temporary staffing solutions is required, HICP has continued to access these via one master vendor system, which takes responsibility for verifying the modern slavery credentials of all third-party agencies supporting the business. An annual audit is completed by the master vendor on behalf of Valor (for HICP) to ensure agency compliance with all requirements to prevent modern slavery.
- We continue to co-operate with all corporate booking agents in providing information to satisfy their enquiries regarding HICP's actions to prevent modern slavery within the business and our supply chains.
- We cooperate fully with any requests from the police or other authorities to participate in local awareness campaigns or test activities and take action following any feedback.

Set out below are the details of the compliance steps that were in place in the relevant financial year.

### Policies and Procedures

The following policies and procedures assisted Valor, on behalf of HICP, in combatting modern slavery:

- One Trust – this central database of suppliers holds details of approved contractors and suppliers for hotel goods and services. One Trust includes a control process to limit the purchasing of items from sources which have not been assessed from a modern slavery perspective, thus controlling the potential risks.

- Our Modern Slavery & Human Trafficking Policy – this reflects our commitment to acting ethically and with integrity in our business relationships to ensure modern slavery is not taking place in our business or supply chains.
- Our Recruitment Procedures – as part of our on-boarding process, we carry out eligibility to work in the UK checks upon commencement and repeatedly, as required, when work permits and Visas expire. This process is facilitated by an on-line portal, RightCheck, which assists in verifying right to work documents to ensure compliance.
- Our employee management system identifies any duplication of key data such as bank accounts and national insurance numbers which could be an indicator of modern slavery
- Our Whistleblowing Policy enables employees to raise any genuine concerns in respect of modern slavery, in confidence if required, and without suffering any form of detriment as a result. This whistleblowing facility is advertised on both Workvivo (internal communications platform) and digital noticeboards within Team Member areas.
- New or renewed contracts for services or supplies contain clauses under which suppliers warrant that modern slavery does not occur in their business or in connection with the services / supplies being provided. The contractual terms also enable regular reviews and audits, where HICP considers that necessary.
- Third parties are also subject to contractual controls in respect of modern slavery, and which entitle HICP to immediately terminate the agreement in the event of any breach. There has been no requirement to terminate any contracts this year.

## **Due Diligence**

We conducted the following due diligence over the relevant period:

Suppliers continue to be assessed and entered on to a central database, One Trust, which will collate, store responses, certification and accreditations from our suppliers. In addition, One Trust will send reminders and anniversary renewals of verification, automating the process whilst capturing a wider coverage of our supply base. Group purchasing organisation, Foodbuy, a part of Compass PLC, has continued to audit its suppliers that HICP used over the past 12 months, providing greater assurance of modern slavery compliance.

## **Training and Awareness**

- New employees complete modern slavery training as part of their hotel orientation. The training includes a section on spotting the signs and the importance of reporting any concerns relating to modern slavery.
- The requirement to be aware of modern slavery risk is included in the Team Member Handbook as part of legal compliance and ethics.
- Employees completed human rights learning modules, which form part of our franchise agreements to operate hotels under licence from Marriott International Hotels, and InterContinental Hotel Group (IHG). These training standards are mandatory requirements, which contain detailed information on how to spot signs of, and help combat, modern slavery in our hotels. Compliance is audited each year during the independent Brand Audit.
- Our existing employees received annual refresher training on modern slavery and are empowered to identify and report signs of human trafficking.
- In respect of training, 338 new hire employees have undergone initial orientation training covering modern slavery and 1104 employees undertook training / refresher training on modern slavery in the last financial year.

## **Effectiveness of policies**

- We have continued to monitor the effectiveness of our policies, compliance steps and training undertaken at our quarterly Modern Slavery Project Group meetings.
- We have reviewed the Transparency in Supply Chains document published by Government in 2025 and as a result included some further questions in our supplier assessment documentation.
- The statistics for our modern slavery training are provided above.
- There have been no cases in respect of modern slavery reported under Whistleblowing procedures or by any other means.

- There has been one incident this reporting period where Company representatives identified potential suspicious behaviour. The police committed to investigate the matter but no further contact or feedback was received.
- We consider that our stance on modern slavery is understood in our business and that we have a range of effective compliance steps in place.
- We will continue to monitor our compliance programme and consider enhancements as necessary

### **Our Future Focus**

We are committed to our zero-tolerance policy in respect of modern slavery and will continue to identify areas for ongoing improvement and complete the implementation of those steps described in the “our actions” section of this statement.

HICP is committed to conducting all business activities ethically, with integrity and with due consideration for human rights and fair labour practices.

Valor, on behalf of HICP will immediately investigate any alleged incidents or complaints relating to modern slavery.

### **APPROVAL**

This statement made pursuant to section 54(1) of the Act for the financial year ending 31 March 2026 has been approved by the board of Directors of HICP on 2<sup>nd</sup> June, 2026.

### **HICP Limited**

Signed: 

Date: 02/06/2026

Name: Jochen Kauschmann

Title: Director