



Modern Slavery Policy

Last update: July 2025



Introduction

Modern slavery in whatever form it takes remains a key issue for society today. At The Inn Collection Group Ltd we are committed to ensuring our business operates ethically in all areas and delivering in our purpose of “Making People Happy”. We will not tolerate the exploitation of vulnerable people within our business or its supply chains. As a growing business always striving to improve, the senior leadership group have developed an action plan including, in 2025 and 2026, a focus on direct Supplier code of conduct and internal training.

Our culture is built on four key values of Warmth, Honesty, Respect and Customer focused, shaping our behaviours in all our interactions.

This policy applies to all Inn Collection Group employees, workers, consultants, direct suppliers and contractors.

Our Policies

We have a number of policies that support our approach to preventing human rights abuse and the clear expectations for both our employees and suppliers.

- Our Colleague Handbook reinforcing our code of conduct and Whistleblowing process launched in 2023
- Dignity at Work policy launched July 2024
- Anti-Bribery Policy
- Young Workers Policy

Modern Slavery Statement

Our Business

The Inn Collection Group Ltd is a pubs with rooms business formed in 2013, but can trace its roots back to 2006 and The Lindisfarne Inn. It now comprises 32 establishments across the North of England and Wales with a headcount of approximately 1,300, split into the below organisational structure:-

Colleague
Supervisor
Management
Leadership Team
Directors



The registered office for the Company is 3rd Floor, Q5, Quorum Business Park, Benton, Newcastle Upon Tyne NE12 8BS.

We work with many suppliers in food and drink as well as goods and services not for resale such as equipment used within our pubs with rooms, utilities, building, maintenance or cleaning contractors, marketing, advertising, recruitment and training or professional services.

Definitions

The Organisation considers that modern slavery encompasses:-

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity, or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

Commitment

We acknowledge our responsibility in relation to tackling modern slavery and commit to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both its internal practices in relation to our labour force and supply chains.

We do not knowingly enter direct business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to us in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to our responsibility under relevant employment legislation in the UK.

Exposure and Due Diligence

Overall, we consider exposure to slavery/human trafficking to be limited. We have however taken steps to educate colleagues and ensure that such practices do not take place within the business nor the business of any organisation that supplies goods and/or services to us.



Steps Introduced:

- *E-module learning course on Modern Slavery rolled out as mandatory to all support and site managers directly associated with the procurement of goods or services*
- *Due diligence processes introduced in relation to ensuring slavery and/or human trafficking does not take place within the business or supply chains.*
- *Action plan introduced focusing firstly on supplier assessment and supplier code of conduct*
- *A review committee held bi-annually has also been introduced to ensure the action plan is delivered*

Key Performance Indicators

We have set the following key performance indicators to measure our effectiveness in ensuring modern slavery is not taking place within our business or supply chains: -

- E-learning % completion
- NMW compliance and WTD audit
- Scheduled breaks and rest periods
- Supplier commitment questionnaire
- Service Occupancy Agreement and tracker
- Live in accommodation audits

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Compliance and Responsibility

Compliance with the above statement can be measured by evidence either in hardcopy or electronic format, such as training reports, supplier statement acceptance etc.

Responsibility exists with all Inn Collection Group employees, consultants, direct suppliers and contractors. Violations of this policy may result in disciplinary action up and including termination of employment and/or legal action.

Responsibility for the policy and process is with the CFO and People Director, the policy and action plan will be reviewed annually ensuring the policy and statement remains fit for purpose.