This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps being taken by The Foundation Group of Companies and its relevant group companies namely Glendola Leisure (Holdings) Limited and Hotel Management International (Holdings) to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

The Foundation Group of Companies is very much aware that modern slavery such as forced, and child labour, servitude, slavery, human trafficking and human exploitation is a growing problem in the world. The company has a zero-tolerance approach to all and

any aspect of modern slavery and works within both administrative policies and procedures with the intention of ensuring our own business and that of our suppliers both comply with and embrace the spirit of the Modern Slavery Act 2015.

Risk Assessment

We have identified that potential areas for modern slavery relevant to our organisation exist in

– the volume of migrant workers within the UK hospitality industry

– the sourcing of food and beverage products from national and international suppliers

– the supply to us of manufactured goods including uniforms and hospitality operating supplies

– company investments and maintenance projects

Human Resources

The Foundation Group of Companies prides itself on being a family-owned business, with people at its heart. Our company has a culture focused on nurturing and developing people, and our principals are applied throughout all recruitment, selection and employment processes.

The company carries out checks that all employees have the legal right to work and live within the UK. The company is fully compliant with employment law, recognising its importance in ensuring the fair treatment of employees; and our employees are made fully aware of their rights whilst offered additional benefits. We foster a supportive and positive work environment through training, coaching and mentoring.

Supply Chain

The Foundation Group of Companies seeks from each of our suppliers of food, beverages and materials written undertakings of compliance with the principles of the Modern Slavery Act 2015, and the gathering of and following up of responses is ongoing.

We will seek to establish through terms of business with our suppliers, express rights to audit their working practices for compliance, including the working and employment conditions of their workers, and oblige them to step down compliance obligations to their own supply chain.

More widely, The Foundation Group of Companies operates a group wide "whistle

blowing" policy which although principally aimed at internal issues has recently been opened to our suppliers with the objective of encouraging the disclosure and resolution of modern slavery practices. The outcomes from this policy will be investigated and appropriate action taken.Our standard terms of business and long-term contractual agreements are continually under review and the abolition of Modern Slavery guides us through our decision-making process with new and existing supply chains. The company adopts a firm stance that it will not work with any organisation engaging in Modern Slavery practices. Within our company, the terms of reference of the Managing Director have been extended to include modern slavery compliance issues. The Managing Director will report to the Board regularly on areas of concern and recommend appropriate action.

Companies

This statement relates to all the companies in the Foundation Group. These companies are:
The Foundation Group of Companies Limited Glendola Leisure (Holdings) Limited
Glendola Leisure Limited
Glendola Leisure 2 Limited
Glendola Irish Bars Limited
Hotel Management International (Holdings) Limited
Hotel Management International Limited
Carlton Hotels Nederland BV
Oostduinhaghe Hotel BV
Spijkenisse Hotel BV
Haarlem Hotel BV
Hotel Exploitatie Mij Maarssenbroek BV
Carlton Ambassador Hotel BV
De Brug BV
Hotel Exploitatie Mij Anfra BV
Carlton Hotel Brussels BV

Conclusion

The Foundation Group of Companies are continually looking for ways and means of improving our product offerings and we intend to bring this drive for perfection to our

efforts to eliminate modern slavery practices from our business.

We recognise that we cannot be complacent and that there is more that can be done and as stated above we continue to ensure our internal practices are compliant, whilst ensuring our supply chains are challenged appropriately. This statement was approved by the boards of directors of The Foundation Group of Companies. Peter Salussolia – Chairman.