



Apex Hotels Group: As the operator of ten hotels across the UK and a laundry facility in Livingston, we consider upholding human rights an integral aspect of our responsible business practices. Our unwavering commitment extends to actively combatting modern slavery, recognizing that transparency and collaboration play pivotal roles. In full compliance with Section 54 of the UK Modern Slavery Act 2015, we hereby disclose the actions taken during the financial year to prevent slavery and human trafficking within our organization and supply chains. This statement pertains to the fiscal year ending on 30th April 2025.

Our Supply Chain: Apex Hotels Group maintains robust direct relationships with a diverse array of suppliers, primarily within the UK, who provide essential products and services integral to our operations. Our supply chain encompasses:

- **Food and Beverage:** We source from reputable suppliers committed to ethical standards.
- **IT Services:** We partner with providers ensuring fair labour practices in system support and technology.
- **Hotel Operations:** Our collaboration extends to suppliers of hotel equipment, maintenance, recruitment, and training services—all committed to ethical employment.
- **Construction Materials:** We engage with building supply companies that uphold labour rights and safety.

Our commitment to ethical supply chain management is unwavering. Our supplier relationships are grounded in legality, efficiency, and fairness. We expect our suppliers to comply with all legal requirements, fostering fair treatment of workers and ensuring safe, healthy work environments. We maintain zero tolerance for forced labour and human trafficking, severing ties with any non-compliant suppliers.

Furthermore, we mandate our suppliers to cascade these ethical standards down their supply chains, fostering a collective effort to eradicate modern slavery. The Apex Hotels Group Procurement Department enforces an Ethical Trading Pledge from our suppliers, prioritizing employee rights and setting forth the following stipulations:

- **Voluntary Employment:** Workers must have autonomy in choosing and terminating employment without undue restrictions or penalties.
- **Freedom of Association:** Workers' rights to organize and bargain collectively are respected and facilitated.
- **Safe Work Conditions:** A hygienic and secure work environment is non-negotiable.
- **Prohibition of Exploitative Labor:** We have zero tolerance for forced, involuntary, or underage labour, and we commit to abolishing child labour.
- **Fair Wages:** Compliance with national minimum wage laws ensures equitable pay for all workers.
- **Health and Safety:** Provision of necessary personal protective equipment at no cost to workers.
- **Reasonable Work Hours:** Adherence to national laws regarding work hours, ensuring they are not excessive.
- **Non-Discrimination:** Our workplace is free from discrimination, harassment, violence, or victimization.

Policy and Training Enhancements: Our Modern Slavery Policy and Whistleblowing Policy form the bedrock of our ethical conduct and integrity. These policies undergo annual review and are designed to prevent any instances of modern slavery or human trafficking within our business. We provide



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comprehensive Modern Slavery training to all new employees, leveraging resources from the Gangmasters and Labour Abuse Authority (GLAA) and the Shiva Foundation.

Risk Assessment and Due Diligence Improvements: Our company-wide risk assessment identifies and evaluates potential risks related to ethics and compliance. Given that the hospitality industry harbours risks of modern slavery and human trafficking, we meticulously assess geographical locations and supply chains. Our success is measured by tracking risk reduction, incident prevention, and overall program effectiveness.

Risk Oversight and Commitment: At Apex Hotels Group, we have appointed senior Directors to diligently oversee Employee Risk and Supply Chain Risk. Their vigilance reflects our resolute dedication to monitoring and mitigating potential risks associated with industry practices, business transactions, and recruitment. Our focus remains on combating Modern Slavery, Human Trafficking, and forced or bonded labour. To measure our progress, we rely on key performance indicators that enable us to monitor, report, and continuously enhance our efforts.

Reporting and Collaboration: We encourage anyone with information related to modern slavery or human trafficking within our organization or supply chain to come forward. Whether through our Risk and Compliance Department or our HR Support Service, we value transparency and collaboration.

Apex Hotels Group remains steadfast in enhancing our practices and educating all stakeholders to ensure a secure workplace for everyone.

Averil Wilson

Managing Director, Apex Hotels Group