Modern Slavery Statement

This statement is made by Apex Hotels Limited on behalf of itself and it's subsidiary companies ('Apex Hotels'). In full compliance with Section 54 of the UK Modern Slavery Act 2015 and following updated 2025 government guidance on transparency, this statement outlines the measures we have taken during the past financial year to identify, prevent and mitigate modern slavery and human trafficking risks across our operations and supply chains alongside measures that are in planning stages. Our approach is driven by a commitment to continuous improvement and proactive engagement.

1. Business Structure and Supply Chains

Apex Hotels operates twelve hotels across the UK, a head office in Edinburgh and a laundry facility in Livingston. We maintain direct relationships with suppliers central to our operations. These include:

· Food & Beverage – Suppliers providing high-quality products while adhering to strict ethical labour standards

· IT Services – Partners ensuring fair labour practices for essential technological support

· Operations – Service providers offering equipment, maintenance, recruitment, cleaning, and training who are contractually bound to ethical employment practices

· Construction Materials – Firms that enforce robust labour rights and health and safety measures

In line with the enhanced expectations for 2025, we now provide a base analysis of our supply chains by mapping geographical and sector-specific risks enhanced by our procurement department's buying local methodology. This enables us to understand where vulnerabilities to modern slavery may exist and to address them through targeted strategies.

2. Organisational Policies and Governance

Our board-approved Modern Slavery Policy and Whistleblowing Policy set out a zero-tolerance stance on forced, involuntary or underage labour. Key elements include:

· Policy cascade that requires all suppliers and partners to uphold these ethical standards

· Regular review of our policies on an annual basis to ensure they remain robust and compliant with both the Modern Slavery Act 2015 and updated government guidance

· A governance framework supported by senior directors who ensure these policies are communicated, enforced, and integrated at every level of the organisation

3. Risk Assessment and Due Diligence

Recognising the need for a detailed understanding of our supply chains, we have refined our risk assessment processes to identify and mitigate modern slavery risks. Our approach now includes:

· Mapping to identify risks across operational and geographical segments

· Due diligence through contractual safeguards

· An ethical trading pledge requiring suppliers to commit to core principles such as:

- Voluntary employment, where workers have the freedom to choose and terminate employment

- Freedom of association, ensuring that workers may organise and collectively bargain

- Safe and hygienic conditions that guarantee secure and healthy work environments

- Fair wages achieved by strict adherence to national minimum wage laws

- Zero tolerance for exploitative labour, ensuring that forced or underage labour is not tolerated

These enhanced processes ensure that we not only identify risks but also take meaningful steps to mitigate them.

4. Training, Awareness and Stakeholder Engagement

A cornerstone of our commitment is the education and empowerment of our workforce. We have expanded our training and awareness programmes to include:

· Employee training, with mandatory Modern Slavery training for every new employee and regular refresher sessions

· Utilising resources from specialist organisations such as the Gangmasters and Labour Abuse Authority to provide practical management tools.

· Enhanced stakeholder engagement, actively soliciting assurance from suppliers so that everyone in our network is informed and vigilant in combating modern slavery.

5. Monitoring, Evaluation and Continuous Improvement

In keeping with the updated 2025 requirements, we have established monitoring and evaluation measures to ensure our anti-slavery interventions remain effective and evolve with emerging risks. These measures include:

· Tracking supplier compliance via supply chain statements and use of resources such as The Global Slavery Index, published by the Walk Free Foundation, the International Labour Organisation (ILO) and the Organisation for Economic Co-operation and Development (OECD) for research and guidelines that can indicate higher-risk areas in the supply chain.

We are working towards:

· The implementation of key performance indicators that track policy effectiveness, supplier compliance and the impact of our risk management strategies to provide oversight by senior directors to review modern slavery-related metrics and ensure prompt action is taken when necessary to allow for the adoption of enhanced auditing practices that incorporate technology-driven supply chain audits and data analytics, allowing proactive remediation.

6. General Principles and Enhanced Engagement

Our commitment to eradicating modern slavery is reflected in our strategic principles. We maintain an emphasis on:

· Transparency by providing clear, detailed, and accessible disclosures about our practices and progress

· Collaborative improvement through active engagement with stakeholders, including industry peers, regulators, and consumers, to share best practices and drive sector-wide enhancements

· Innovation and adaptability

7. Recruitment Controls for Preventing Exploitation in the UK

As a UK owned and operated group, we recognise that even within our borders there exists the potential for modern slavery, human trafficking, and child exploitation – particularly in sectors or roles involving vulnerable candidates. Our recruitment practices are therefore designed to be transparent, thorough, and compliant with key UK regulations such as the Modern Slavery Act 2015, the Equality Act 2010, and other relevant employment and data protection laws.

Our approach is built on the following core principles:

• Candidate Verification process - every candidate is subject to identity and background checks, including right-to-work and qualification verification. This process is designed to ensure that all individuals are recruited voluntarily, without any form of coercion, and in full compliance with UK legal requirements. Care is taken when recruiting for roles where vulnerability is higher, so that no candidate is at risk of exploitation.

· Scrutiny of recruitment – all recruitment agencies and third-party providers are required to comply with our ethical code.

· Fair and transparent advertising and selection – we ensure that all job advertisements and selection processes are clear, non-discriminatory, and focused solely on merit.

· In line with the GDPR and UK data protection laws, all candidate data is handled securely, with clear records maintained of recruitment decisions and verification processes. This ensures not only legal compliance but also provides a transparent audit trail to demonstrate ethical recruitment practices.

8. Reporting and Collaboration

We view prompt reporting as essential to our modern slavery strategy. All employees, suppliers and stakeholders are encouraged to report any suspicions or evidence of modern slavery or human trafficking. Reports may be submitted confidentially through our Governance, Risk and Compliance Department or via our HR Support Service. This transparent and collaborative approach ensures risks are promptly identified and addressed while reinforcing our collective commitment to a safe and ethical working environment.

By embedding these controls into our recruitment process, we protect both our organisation and the individuals we hire. Our commitment is to uphold the highest ethical standards in all domestic recruitment activities, thereby contributing to the eradication of modern slavery, human trafficking, and child exploitation within the UK.

Conclusion

Apex Hotels Group remains resolutely committed to eradicating modern slavery by embedding robust practices across all aspects of our business. This Modern Slavery Statement, which has been prepared in line with UK legal requirements and updated 2025 guidance, reflects our dedication to transparency, continuous improvement, and proactive stakeholder engagement. We will continue to refine our approach as new challenges emerge, exploring advanced, technology-driven supply chain audits and methodologies to reinforce our commitment.

Averil Wilson Managing Director, Apex Hotels Group

This statement has been approved by our Board and is published on our website. It is also available through the Government's modern slavery statement registry in full compliance with UK law.