

DOUBLETREE BY HILTON MILTON KEYNES

Slavery and Human Trafficking Statement

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Role in Organisation	Director
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Introduction

This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that HOTEL MK has taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

Our organisation's structure

HOTEL MK is company limited by guarantee whose core business is the delivery of a 300+ bedroom hotel located principally in Stadium MK The Company is self-sufficient in terms of the goods and services it procures directly.

Our policy on slavery and human trafficking

HOTEL MK is committed to acquiring goods and services for its use without causing harm to others. In doing so, HOTEL MK is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

HOTEL MK is committed to ensuring that it conducts its business ethically and with integrity. HOTEL MK does not use slave labour anywhere in its own business, nor does HOTEL MK tolerate forced or compulsory labour or human trafficking. HOTEL MK is committed to ensuring that no such behaviour takes place in connection with the company. This commitment extends to HOTEL MK's supply chain. HOTEL MK's supplier relationships are based on lawful, efficient and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. HOTEL MK will not knowingly use any supplier that uses forced, prison, or indentured labour. HOTEL MK will only work with suppliers who comply with all laws regarding slavery and human trafficking in the countries in which the suppliers are doing business

In implementing this approach HOTEL MK supports the Base Code of the Ethical Trading Initiative:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Our employment contracts meet all the requirements of employment law
- No harsh or inhumane treatment is allowed

Our Supply Chains

HOTEL MK's supply chains are managed under five "super-categories":

- Sport consumables and equipment
- ICT equipment and services
- General goods and services
- Facility Hire

Our assessment at this time is that the principal areas which carry material risks are sport consumables and equipment, ICT and AV equipment.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Preliminary work is under way on implementing our Anti-Slavery and Human Trafficking Policy which will reflect our commitment to acting ethically and with integrity in all our business relationships, and the implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

What we are doing now

HOTEL MK's procurements follow one of three pathways: collaborative, through alliances with MK Dons, in-house tendering and contracting, using the Hilton procurement service. HOTEL MK actively engages with its partners to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.

HOTEL MK's in-house tendering and contracting processes include some prequalification clauses. Our standard terms and conditions have clauses covering modern slavery and human trafficking. A sample clause is attached at Annexe 1

Ensuring that the Government's Right to Work policy is followed with strict compliance.

What we are going to do in the Future

As part of this reporting exercise in this and the coming years, HOTEL MK expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working on them.

For contracts that we have awarded we will identify those supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations.

We will address Modern Slavery as a formal business risk that will be reviewed at quarterly meetings and owned by Executives within the business.

Review our procurement processes to identify Modern Slavery as a risk to be identified and assessed on supplier audits.

ANNEXE 1

Clause for Modern Slavery Act Compliance

1. COMPLIANCE WITH LAWS AND POLICIES

1.1 In performing its obligations under the agreement, the Supplier shall and shall ensure that each of its subcontractors shall:

(a) comply with all applicable laws, statutes, regulations in force from time to time including but not limited to the Modern Slavery Act 2015; and,

(b) take reasonable steps to ensure that there is no modern slavery or human trafficking in the Suppliers or subcontractors supply chains or in any part of their business

2. DUE DILIGENCE

2.1 The Supplier represents and warrants that:

(a) neither the Supplier nor any of its officers, employees or other persons associated with it:

(i) has been convicted of any offence involving slavery and human trafficking; and

(ii) having made reasonable enquiries, to the best of its knowledge, has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.

2.2 The Supplier shall implement due diligence procedures for its own suppliers, subcontractors and other participants to ensure that there is no slavery or human trafficking in its supply chains.

3. SUBCONTRACTING

The Supplier shall not subcontract its obligations under this agreement without the prior written consent of Hotel MK.

3.2 In order to help Hotel MK reach a decision on a proposed subcontract, the Supplier shall provide Hotel MK with a copy of any proposed subcontract, together with any other information that Hotel MK may reasonably require about the proposed subcontractor.

3.3 If Hotel MK agrees that the Supplier may subcontract its obligations, the Supplier shall implement an appropriate system of due diligence designed to ensure the subcontractor complies with the principles of the Modern Slavery Act 2015 and that the subcontractor shall take reasonable steps to ensure that there is no modern slavery or human trafficking in the subcontractors supply chains or in any part of its business

4. REPORTS

4.1 The Supplier shall notify Hotel MK as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with this Agreement.

4.2 The Supplier shall prepare and deliver to Hotel MK no later than April each year, an annual slavery and human trafficking statement setting out the steps it has taken to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business.

5. AUDITS

5.1 The Supplier shall maintain a complete Company of records to trace the supply chain of all goods and services provided to Hotel MK in connection with this agreement.

6. TRAINING

6.1 The Supplier shall implement a system of training for its employees to ensure compliance with the principles of the Modern Slavery Act 2015 and the prevention of modern slavery or human trafficking.

6.2 The Supplier shall keep a record of all training offered and completed by its employees and shall make a copy of the record available to Hotel MK on request.

7. WARRANTIES

The Supplier represents, warrants and undertakes that it conducts its business in a manner that is consistent with the principles of the Modern Slavery Act 2015.

8. TERMINATION

Hotel MK may terminate the agreement with immediate effect by giving written notice to the Supplier if the Supplier commits a breach of Clauses 1, 2 4 or 7.