



Modern slavery statement for financial year 2016/17

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Beds and Bars Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Beds and Bars Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Beds and Bars Group operates Hostel and Bars in UK and Europe. We work with wide range of suppliers across the business. Our business and supply chains are located within countries that are members of the European Union.

Our risk areas

Studies have shown that modern slavery can impact a hotel/accommodation provider in a variety of ways;

1. Use of a hotel for the sexual exploitation of adults and children
2. Staff, and in particular those recruited or subcontracted via unscrupulous agencies, being victims of forced or bonded labour
3. Products and services supplied to the hotel being produced by forced or bonded labour, labour exploitation and unethical labour practices

Our policies

Our Policies comply with EU and UK legislation including the Modern Slavery Act 2015 and the Proceeds of Crime Act 2002 and we ensure that our suppliers comply with all relevant national and local legislation and our best practices.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies are designed to;

- Protect our Customers by ensuring that our premises are not sued for the purposes of slavery in all its forms.
- Protect our Employees by ensuring that our employees are not subject to slavery in their working conditions, and,
- Managing our supply chain to ensure that our suppliers subscribe to the highest possible standards with regard to the prevention of slavery.

These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Managing the Supply Chain

Beds and Bars Group operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [if applicable, and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

for example:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for;

- Hostel staff to be on the alert for any incidences where slavery may be present
- our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

Our business KPI's include profitability measures as well as customer ratings. Whilst there is a risk that the focus on these items could drive behaviours that encourage modern slavery, we believe that our full package of policies and procedures removes the risk of this occurring.

With particular regard to the Human Slavery policies, we will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

for example

- we will ensure staff training occurs regularly and records kept
- [we will include an assessment as part of our regular H&S audits]
- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors

Name (Director)
Signature
Date