



## **Hastings Hotels Group Limited Modern Slavery Act Transparency Statement** **Financial Year 26/27**

### **Introduction**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as debt bondage, forced and compulsory labour and human trafficking. These acts all involve the deprivation of a person's rights and liberty in order to exploit them for personal or commercial gain. Hastings Hotels Group condemns any form of modern slavery.

### **About Hastings Hotels**

Hastings Hotels Group Limited is the non-trading holding company of Hastings Hotels Management Limited, HHG No.1 Limited, HHG No.2 Limited, HHG No.3 Limited, HHG No.4 Limited, HHG No.5 Limited and HHG No. 6 Limited, (collectively, “**the Hastings Hotels Group**” or “**the Group**”).

The Hastings Hotels Group consists of six hotels and resorts in Northern Ireland. The business relies on the services of around 950 workers. The Group meets the turnover threshold under the Modern Slavery Act 2015 (“**the Act**”) and we seek to comply with our obligations in respect of same.

The Group recognises that modern slavery is not an issue confined to the overseas hospitality sector. It recognises that the risks can arise from the use of foreign and migrant labour, and from supply chains both in the UK and overseas.

As Hastings Hotels Group Limited is the non-trading holding company of its subsidiary companies, it is those subsidiary companies’ supply chains which currently make up the bulk of suppliers. The Group’s combined supply chain includes but is not limited to:

- Textile & furniture manufacturers;
- Wholesale food and drink producers; and
- Recruitment & temporary staffing agencies

### **Our Policies and Procedures**

Hastings Hotels Group has worked in conjunction with external advisors to review all its policies and procedures, including its modern slavery and whistleblowing policy. These policies are updated on an annual basis and are communicated to staff to ensure that they are aware of the businesses' obligations under the Act and to whom any concerns or suspicions regarding modern slavery within the business or its supply chains should be reported. These policies are issued to existing and new staff, and the Group is committed to complying with these policies.

### **Modern Slavery Risk Management**

Hastings Hotels Group recognises that the largest risk areas for modern slavery are in the recruitment of its own staff and in the supply of textile materials. To manage the risk in its recruitment procedures, the People & Culture department for the Group conducts right to work checks in line with UK government guidance and remains live to the issue of control for the purposes of modern slavery.

Additionally, to manage risk in our supply chain we are committed to conducting further due diligence on our suppliers as detailed below.

### **Due Diligence**

Throughout previous financial years, Hastings Hotels Group has maintained accurate records in relation to its supply chain audit and has sought external advice in relation to expanding and alternating this supply chain audit by reference to volume and/ or geographic region. We intend to regularly diversify and expand this audit in the coming years to enhance our compliance annually.

### **Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains**

We are confident that our staff are aware of how to report any concerns they have in relation to slavery and human trafficking as each member of staff has access to these policies and procedures in the Employee Handbook. If we receive any report or concern in relation to modern slavery, we are committed to fully investigating this matter and taking the appropriate action to protect any individual at risk.

### **Training**

The Board of Directors, and senior management team at the Hastings Hotels Group have completed a training programme in relation to modern slavery and on our individual and collective responsibilities. This training was conducted by external advisors and helps to ensure that we meet our obligations, and that our supply chain does the same.

We have included modern slavery awareness training to all new staff at induction and we intend to continue to roll similar training out to the various levels of staff during the next financial year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Hastings Hotels Group's modern slavery and human trafficking statement for the financial year ending 31 October 2025.



Howard Hastings

17 April 2026

This statement was approved by the Board of Directors on 17<sup>th</sup> April 2026