

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is published by Cairn Group, in compliance with the Modern Slavery Act 2015. This statement outlines how Cairn Group ("Cairn", the "Business") helps to prevent modern slavery and human trafficking in all parts of its business and supply chain.

For the purposes of this statement, the companies conducting business within the United Kingdom, are collectively referred to as "Cairn Group" include Station Hotel (Newcastle) Ltd and its subsidiaries and CHG (Newcastle) Ltd.

At Cairn Group we take seriously our responsibility to help prevent the crime of modern slavery and human trafficking across our own business, our partners and suppliers.

### **OUR BUSINESS STRUCTURE AND SUPPLY CHAIN**

Cairn Group is a national hospitality company with a portfolio of multiple brands, 36 properties and a team of over 2,000 employees.

Cairn Group develops partnerships with more than 4000 suppliers, for goods and services, at the best combination of price, quality, and service.

### **OUR COMMITMENT TO HUMAN RIGHTS**

At Cairn Group we put people first. We are passionate about delivering the highest levels of service and we want our people to have a positive and rewarding experience. It's our objective to inspire our people to be the best they can be, while also providing a best in class and personalised service to our guests.

Our employment policies and procedures aim to ensure everyone is treated equally, fairly and consistently. We look to inspire a working environment in which equality, diversity, inclusion and human rights are recognised, valued and encouraged.

Our commitment to respecting human rights is detailed in our Equalities, Diversity and Inclusion policy. Additionally, all our human rights-related trainings, guidance, tools are available to all employees and are refreshed periodically.

Accountability for human rights sits with our board, with responsibility devolved to our senior leadership team, Central Support function and our managers/ employees at site level.

As part of our commitment, we ensure that our workers are not being exploited, that our work environment is safe, and that all employment, health & safety and human right laws are fully adhered to.

Our Equality, Diversity and Inclusion Policy embodies and reinforces our commitment to these and other key guiding principles and applies to all Cairn Group companies and employees.

We demonstrate responsible workplace practices, and endeavour to conduct business operations in a manner that is free from complicity in human rights abuses. We are committed to ethical business practices and protecting human rights. As a responsible

business, we believe that strong ethics and good business go hand in hand. The Company is committed to complying with all applicable human rights laws and regulations and our Equality, Diversity and Inclusion Policy is available to all employees.

To demonstrate our commitment to human rights we:

- support the protection of human rights, particularly those of our colleagues, the parties we do business with and the communities where we operate;
- provide a safe and healthy working environment;
- support the elimination of employment discrimination and promote diversity in the workplace;
- provide our colleagues with remuneration and tools for their roles, and take their well-being into consideration;
- conduct our business with honesty and integrity in compliance with applicable laws; develop and implement company procedures and processes to ensure we comply with this policy.; and
- do not support forced and compulsory labour or the exploitation of children.

### **ETHICAL BUSINESS CONDUCT**

We require that business be conducted with honesty and integrity, and in full compliance with all applicable laws. Policies establish clear ethical standards and guidelines for how we do business and establish accountability. All employees are required to obey the law and comply with specific standards relating to legal obligations, ethics, and business conduct.

As part of our procurement process, we periodically vet our partners and suppliers to identify and help prevent potential modern slavery or human trafficking risks in our supply chain. We expect our partners and suppliers to ensure that they either have equivalent policies to ours or that they abide by our policies.

### **OUR DUE DILIGENCE PROCESSES - RISK IDENTIFICATION**

Upon reviewing our business practices and the wider risks in our sector, our assessment identified the following principle modern slavery risks:

1. Our employees could be at risk of being exposed to situations of working excessive hours or bonded labour excised by external parties.
2. Our venues could be at risk of attempts by criminals to traffic victims for sexual exploitation or as halfway houses in the movement of victims.
3. Individuals employed via a recruitment agency or a labour outsourcing agency, or by other goods or services suppliers could be at risk of forced / bonded or child labour as a result of a range of potential factors, from excessive recruitment fees to failure to pay National Minimum Wage.

4. Construction workers employed by appointed contractors could be at risk of forced / bonded or child labour as a result of a range of potential factors, from excessive recruitment fees, to restrictions on freedom of movement or failure to monitor workers' ages.

## **RISK MONITORING AND MITIGATION**

Our mitigation response to identified risks:

1. We encourage all our employees to raise concerns about potential violations of our Equalities, Diversity and Inclusion Policy, including risks of human trafficking or modern slavery, to their manager. Alternatively, these can be reported directly to HR . We monitor all earnings to ensure that minimum wage payments are met and no unlawful deductions are made from pay. All employees are expected to be vigilant for suspicious and unusual behaviour within their teams. All incidents are investigated and logged. Any trends are identified with the purpose of applying more focused examination and implementation of preventative measures.
2. All Team Members are required to report safety or reputational incidents, including potential situations of modern slavery, via a Manager, Modern Slavery helpline or Police depending on the situation. Advice and training is given to all new employees and existing employees refreshed periodically.
3. We understand some external organisations may use our Business to attempt to fraudulently recruit individuals. We do not charge recruitment fees to employees and do not expect our business partners to do so. Wherever possible, Cairn Group hires candidates directly and all employment contracts are issued directly by us. We do not use 3rd parties to issue employment contracts.
4. Suppliers are encouraged to have appropriate management systems in place and take steps to comply with this. They must undergo due diligence and compliance checks, including initial screening on human rights, before agreements or partnerships are made.
5. We carry out due diligence reviews on our agencies who provide team members.

## **TRAINING AND AWARENESS**

Mandatory training is required of all our employees with respect to Modern Slavery, Equality, Diversity & Inclusion & Health & Safety, with further safeguards in place for compliance in relation to the likes of right to work, National Minimum Wage and The Working Time Directive. Additional support can also be obtained from the HR team.

*This updated version of the statement was approved by our board of directors on 29/01/2025.*