



DERBYSHIRE HOUSE ST.CHAD'S STREET LONDON WC1H 8AG
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Anti-Slavery Policy

1. St Pancras Hotels Group Ltd and all its operating subsidiaries (here within referred to as The Company) is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. The Company is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. The Company provides appropriate training and awareness information for all its staff.
In particular:
 - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to company CEO, Antonio Megaro.
5. Reports surrounding these issues are taken extremely seriously by the company CEO who is committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The effectiveness of enforcement against suppliers who breach policies,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we will monitor and review our statement on a regular basis.

This statement is made as part of **The Company's** commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how **The Company** operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and will be reviewed by The Company whenever legally so obliged, or as a direct finding of common practices.