

Arora Group Modern Slavery & Human trafficking statement

Introduction

This statement sets out the Arora Group's position regarding all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within its business and its supply chains.

This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

We recognise that we are publishing this statement later than expected. This is because of reduced staff capacity/increased difficulty in gathering the required information from our suppliers during the coronavirus pandemic.

As part of hospitality, construction and property/asset management, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic and beyond.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Our Business

The Arora Group is one of the largest privately owned hotel groups within the United Kingdom. We own and operate several hotels in and around the greater London area. We also own a construction and property/asset management business.

A full description of our business can be found here: <https://thearoragroup.com/business>

At present we operate only within the UK.

Risk Areas

At present we have identified following activities to be at high risk of slavery or human trafficking:

- Use of agency workers

Risk Management

We operate a stringent approach regarding the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking within our business and supply chain:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Binding commitments and representations regarding modern slavery are incorporated into contracts (such as agency worker contracts) where we perceive there to be potential or actual risks.
- **Recruitment/Agency workers** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Due diligence** Again, where we perceive there to be potential or actual risks we undertake due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.

Training

We require all members of the procurement team / HR professionals/ General Managers within our organisation to complete training on modern slavery as a module within our wider training programme via our training platform.

We require General Managers/HR professionals/ and procurement team to complete training on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.