

# Dalata Hotel Group Modern Slavery Policy and Statement 2025

14 January 2025

Version 5.0



**DALATA**  
HOTEL GROUP

## Purpose

This statement provides details on our overall policy and the steps we are taking to manage the potential risks to our business of modern slavery and human trafficking.

Dalata Hotel Group plc (“the Group”) is publishing this policy and statement in compliance with Section 54 of the UK Modern Slavery Act 2015.

## Scope

This policy is applicable to Dalata Hotel Group employees and our business partners.

## Group Policy

The Group strives to act ethically with integrity, honesty, and professionalism in all aspects of our business. Modern slavery is a crime and is defined by the UK Modern Slavery Act as “slavery, servitude and forced or compulsory Labour” and “human trafficking”.

Our policy is that Dalata Hotel Group plc adopts a zero-tolerance approach to modern slavery and human trafficking. We are committed to ensuring that these practices do not exist within our business or supply chains. The Board and Audit & Risk Committee oversee our risks and policies in this area.

We encourage all employees to report any suspected wrongdoing in this area through established confidential reporting channels.

## Organisational Structure

Dalata Hotel Group plc is Ireland’s largest hotel operator with a growing presence in the UK. As of January 2025, we operate 56 hotels (31 in the Republic of Ireland, 23 in the UK including partner hotels, one in Germany and one in The Netherlands). Dalata’s Central Office is located in Dublin, Ireland.

We operate leading hotel brands, Clayton Hotels, Maldron Hotels, The Gibson Hotel and The Samuel Hotel. All our hotels offer a full service, including bedrooms, food and beverage, and meeting and events facilities. Some have more extensive guest services, conference facilities, or leisure facilities, depending on hotel location, guest expectations, and market positioning.

We employ in the region of 5,500 people across the Group.

## Our Responsibility

We acknowledge that despite being illegal, slavery, servitude, forced labour, and human trafficking continue to be issues in Europe. In today's global marketplace, we also recognise that all businesses should understand what constitutes modern slavery and human trafficking, and where these practices might occur. Companies must identify these practices within their operations or supply chains, and at Dalata Hotel Group plc, we take this responsibility seriously.

We are committed to making meaningful, long-term improvements to workers' employment and workplace conditions. We do this through our policies and governance, which are supported and overseen by our leadership team. We believe that we have a strong and ethical workplace culture at Dalata, which flows from Central Office to the hotels.

We have a supplier code of conduct which outlines how we expect our suppliers to behave and to conduct their business ethically.

The Group operates a group-wide confidential protected disclosure policy, and all Dalata employees are encouraged to report any wrongdoing through this process. We have robust policies and procedures to deal with any concerns of wrongdoing from our employees and customers. We have implemented training for all senior management and hotel employees, available through our Dalata Academy on how to spot the signs of human trafficking, the responsibilities of raising a concern and how to address it in a confidential manner.

The Chief Operating Officer has group-wide operational responsibility for promoting our modern slavery policies. The executive management team and hotel General Managers are responsible for implementing these policies in their specific business units.

## Raising a Concern

The best avenue for an employee to raise a concern is through their direct line manager, HR Manager or General Manager. However, if an employee feels uncomfortable with speaking up locally, they can raise their concern through the confidential email address [speakup@dalatahotelgroup.com](mailto:speakup@dalatahotelgroup.com).

The same confidential email address may be used by guests, clients, customers or suppliers.

## Our Supply Chains

We have analysed our key relevant supply chains in the following way:

### **PURCHASING SUPPLY CHAIN**

Our purchasing supply chain is made up of the following elements:

- Food and beverage for resale to our guests
- Furniture, fixtures, and equipment for use in our hotels
- Hotel supplies not for resale (such as linen, stationery, etc.)

- Hotel service agreements, covering areas such as maintenance, health and safety
- Providers of professional services.

The Group has a Procurement Department based in Central Office, which oversees our contractual arrangements with suppliers. We aim to use market-leading suppliers across our product groups and regions, while offering local supply options to our hotels.

The Procurement team sets up suppliers within our procurement system when the supplier has met contractual requirements, including their policy on preventing modern slavery.

## RECRUITMENT SUPPLY CHAIN

We aim to recruit our employees directly, and most people working at our hotels are employed directly by us. Each hotel has a HR Manager, and formal policies, procedures, and approval structures are in place for recruitment. Our recruitment and employment policies are designed to ensure, as far as possible, that the Group is not exposed to the fraudulent recruitment of employees or the exploitation of workers in our hotels. We use recruitment agencies only in limited circumstances, e.g., when recruiting for a specific professional role or a particular business need.

Any individual who works with the company who is not an employee has a contractual agreement relevant to the services they provide.

In the UK, we use third-party agencies for the provision of housekeeping services at most of our UK hotels. This is typical market practice. Housekeeping services are also outsourced in our German hotel. Housekeeping agencies are selected following a due diligence process, and contracts are in place for all agencies. A programme of assessing compliance with employment requirements and policies (including modern slavery) is also in place, overseen from Central Office. We also use other agencies to provide us with workers for specific circumstances in our hotels, such as when catering for large events.

## CONSTRUCTION AND DEVELOPMENT PARTNERS

We contract with third parties for the construction of new hotels and development investments in existing hotels. These contracts would normally be through a direct contract with a construction firm or via a lease agreement with a Developer / Landlord.

For new properties or development projects, we will strive to ensure all future construction and development partners are compliant with Dalata's supplier code of conduct by including appropriate commitments within the applicable contracts issued.

## Review & Next Steps

In 2021, we updated our risk assessment in relation to modern slavery, which was considered by the Audit & Risk Committee. Responsible Labour practices, modern slavery and human rights are now included in our ESG framework and reviewed each year.

In 2022, we undertook an added assessment of our supply chain, particularly third-party agencies and our main suppliers. The assessment included compliance with Dalata's supplier code of conduct checks to ensure that our suppliers manage their modern slavery risks.

In 2023, we maintained our level of compliance based on our added assessments of our supply chain. We reviewed our list of suppliers, and the owner of the departments were tasked with ensuring that our suppliers adhered to their responsibilities in this area as outlined in our supply agreement.

In 2024, we continued to maintain our levels of compliance based on the above which we will continue in 2025. Should a supplier not have the relevant policies in place we will engage with the supplier to support them in meeting the Dalata Supplier Code of Conduct standards.

## Board Approval

The Board of Dalata Hotel Group approved this statement on



**Dermot Crowley**

CEO, Dalata Hotel Group plc

# Modern Slavery Policy and Statement 2025

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