



MODERN SLAVERY STATEMENT

Introduction

M.A.C. Hotels LTD – Whatley Manor Hotel is an independent, privately owned 5-star country house hotel located in Wiltshire, UK. All employees of M.A.C. Hotels LTD are based here. Our company ethos centres around **RESPECT** and as such we take a zero-tolerance approach to modern slavery in line with our obligations under the Modern Slavery Act 2015. We are committed to acting ethically and with integrity in all of our business dealings and relationships to ensure that modern slavery and human trafficking is not taking place anywhere within our business or in any of our supply chains.

Hospitality is identified as a sector at risk of modern slavery which is a serious, often hidden crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Supply Chain

We are committed to ensuring there is transparency within our own business and in our approach to tackling modern slavery throughout our supply chains. Procurement of good and services refers to all items required for operating a standalone hotel, such as food and beverages, furniture and equipment, cleaning products and linen, spa products, as well as technology, professional services, recruitment and development.

Some of our products are sourced from sectors recognised as having a higher risk of modern slavery, such as agriculture, fishery and food processing, furniture and textiles. We expect our suppliers in these sectors to be equally committed to ethical trade and expect the same high standards from all our contractors, suppliers and other business partners.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children and we expect our suppliers to hold their own suppliers to the same high standards. These standards apply to anyone working for us or on our behalf in any capacity, including employees, directors, agency workers, interns, agents, contractors, external consultants, third party representatives and business partners.

Our Policies

Our Company Handbook which is distributed to all employees highlights our commitment to Antislavery and Human trafficking. We have a number of policies which support our approach:

- **Modern Slavery & Anti-Human Trafficking Policy**, which explains our approach to preventing human trafficking and modern slavery within our Company and through our supply chains
- **Supplier Code of Conduct**, which explains the standards that we expect our suppliers to uphold when providing us with good and services
- **Right to Work Policy**, which illustrates our commitment to the prevention of illegal working

- **Equality Diversity & Inclusion Policy**, which reflects our approach to facilitating a workplace that embraces differences and one which promotes equality, equal pay, respect and dignity, whilst prohibiting harassment, bullying, victimisation or any other unlawful discrimination
- **Whistleblowing Policy**, which provides a route through which colleagues may raise concerns of wrongdoing without fear of reprisals or adverse treatment

Due Diligence

As part of our due diligence, suppliers are required to confirm their commitment to our supplier code of conduct and with that, their own due diligence regarding their own supply chain in order to supply us with good and services. We reserve the right to carry out ad hoc supplier visits and to carry out our own reviews of their compliance with our Supplier Code of Conduct. We reserve the right to terminate an agreement with any supplier that does not comply.

Training

We include Modern Slavery Awareness as a training topic to all new employees during our company induction and have introduced an E-Learning training module for all managers and those involved in the procurement process to reduce the risk of modern slavery in our business and through our supply chain. We also provide this facility for the entire hotel team in order to promote awareness of the issue and how it affects our industry, including how to spot the signs of and help combat modern slavery and human trafficking.

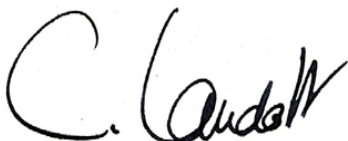
Key Performance Indicators

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. We commit to monitoring and measuring the effectiveness of our approach as follows:

- Number of staff trained on Modern Slavery and Whistleblowing Policies
- Number of Incidents or complaints relating to modern slavery or human trafficking raised through the Company Whistleblowing procedure
- Corrective actions taken as a result of recorded incidents or complaints

This statement was approved by the Company Directors on 7th May 2020

Signed:



Christian Landolt