



## HR PEOPLE POLICIES

### Modern Slavery & Anti-Human Trafficking Policy

#### Introduction

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.

#### Who this policy is for:

This policy applies to all persons working for the Company or on behalf of the Company in any capacity, including employees at all levels, directors, agency workers, interns, agents, contractors, external consultants, third party representatives and business partners.

This policy does not form part of any employee's contract of employment and the Company reserve the right to make amendments at any time.

#### Responsibility:

Overall responsibility for ensuring that this policy complies with all relevant legal and ethical obligations lies with the Company Directors. The General Manager has primary and day to day responsibility for implementation and compliance with this policy and for monitoring its use and effectiveness.

Line Managers at all levels within the Company are responsible for ensuring that those reporting to them understand and comply with the contents of this policy and are provided with adequate and regular training on it and the risk of modern slavery within the hospitality sector and in our supply chains.

All those involved in procurement are responsible for mitigating the risks particularly associated with our supply chain and for ensuring that all suppliers are provided with and agree to commit to our Supplier Code of conduct.

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under its control. You are required to avoid any activity that might lead to or suggest a breach of this policy.

## **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. This list is by no means exhaustive and the procurement of good and service relates to all departments.

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 of 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.

The Company's zero – tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

## **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.

No employee may:

- Use the hotel's facilities, resources or equipment including the hotel's premises, computers networks and restaurants for the purposes of modern slavery
- Allow the use by any guest of any of the hotel's facilities, resources or equipment including the hotel's premises, computers, networks and restaurants for the purposes of modern slavery
- Facilitate any act or related act of modern slavery

## **Training**

Modern Slavery Awareness training is included during our company induction with all new employees and we also provide 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. This facility is also provided 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.

## 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
- **Sexual Harassment Policy**, which reinforces our zero-tolerance approach to sexual harassment in the workplace, explains our preventative actions and support available
- **Whistleblowing Policy**, which provides a route through which colleagues may raise concerns of wrongdoing without fear of reprisals or adverse treatment

## Breaches

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains at the earliest opportunity. If you believe or suspect that a breach of this policy has occurred or that it may occur, you must notify a manager immediately.

The Company aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of the business or in any of the supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment you should raise a complaint using the Company's grievance procedure.

## Key Performance Indicators

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



## 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.

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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.

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- **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.

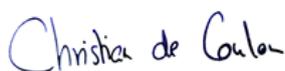
## **Key Performance Indicators**

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- Number of staff trained on Modern Slavery and Whistleblowing Policies
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## **This statement was approved by the Company Directors**

Signed:



Christian de Coulon



## **SUPPLIER CODE OF CONDUCT**

### **(Modern Slavery - Human Trafficking - Sexual Harassment)**

#### **Introduction**

M.A.C. Hotels LTD – Whatley Manor Hotel is committed to acting ethically and with integrity in all of its 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 and that workers are treated with dignity and respect and provided with safe working conditions. We are committed to working with environmentally responsible businesses.

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. We are committed to ensuring there is transparency within our own business and in our approach to tackling modern slavery, human trafficking and sexual harassment through our supply chain.

We have set our Code of Conduct, defining the minimum standards and basic principles of cooperation expected from all our suppliers, whether they supply goods, services or people.

Whatley Manor expects its suppliers to respect the rights of their employees (and volunteers) and to comply with all applicable employment legislation, regulations and directives in the countries in which they operate. In the absence of any such legislation, requirements are based on core International Labour Organization (ILO) conventions, the Ethical Trading Initiative (ETI) base code, the UN Guiding Principles on Business and Human Rights and the UNWTO Global Code of Ethics for Tourism.

#### **Employment**

- There are no victims of modern slavery working in any part of the supply chain who have been recruited, transported, transferred, harboured or received for the purposes of exploitation.
- There is no forced, bonded, indentured or involuntary prison labour.
- Workers are not required to pay fees either directly or indirectly to obtain work and are free to terminate their employment subject to reasonable notice periods.

#### **Freedom of Association**

- Suppliers must respect the rights of workers to join or not join a trade union.

#### **Working Conditions**

- Suppliers must ensure a safe and hygienic working environment and maintain a record of all accidents and incidents, in accordance with Reporting of Injuries, Diseases and Dangerous Occurrences regulations (RIDDOR).
- An accident prevention strategy should be in place and regular health and safety training must be delivered and recorded.
- Provision of clean toilet facilities, water and sanitary food storage.
- Occupational risk assessments must be in place with relevant documentation and permits regarding structural, electrical and fire safety.

## **Child Labour**

- Suppliers may not employ child labour as indicated by local legislation - Typically, workers should be at least 15 years of age but must be at least the age for completing compulsory education in that country.
- Young persons may not be employed at night, in hazardous conditions and suppliers must comply with all relevant legislation regulating young workers,
- Suppliers must be committed to ECPAT protecting children from trafficking and exploitation.

## **Remuneration**

- Suppliers must pay fair remuneration for both men and women for work of equal value in accordance with local employment legislation. This includes legally mandated minimum wages and benefits.
- Suppliers should not delay, withhold or defer wages legally due to its employees.

## **Working Hours and Annual leave**

- Working hours must comply with local employment legislation and industry standards.
- Overtime hours will be voluntary, not worked routinely and fully compensated at regular or premium rates, according to local legal requirements.
- Reasonable annual leave must be given to employees in accordance with local legislation.

## **Diversity, Equality and Inclusion**

- Suppliers must not discriminate against any worker based on age, gender, race, colour, nationality, sex, religion, sexuality, disability, marital status, sexual orientation, union membership or political affiliation.
- Suppliers will fully comply with local laws regarding equality of employment and training opportunities.

## **Humane Treatment and Harassment**

- Suppliers must be committed to a workplace free of harassment, harm, intimidation or fear.
- Suppliers must adhere to a zero-tolerance approach to mental, physical or sexual abuse or coercion or any other such inhumane practices.
- Suppliers will develop a whistleblowing process for their workers.

**NB.** Whatley Manor has a strict zero tolerance approach to sexual harassment in any capacity and will not tolerate any form of sexual harassment towards our team by internal or external parties, which can occur in person or virtually. Any criminal acts will be reported to the police.

## **Anti-Bribery and Corruption**

- Suppliers should ensure appropriate policies are in place to promote ethical business practices and to ensure the prevention, detection and reporting of bribery and corruption
- Suppliers should ensure fair practices are adopted in competing for business and that they make purchasing decisions objectively based on price, delivery, quality and other such factors
- Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. No supplier or its representatives or employees shall offer to any employer a bribe or equivalent. Suppliers should observe local custom with respect to gifts or hospitality – the value of such offers should never be considered material enough to influence business decisions or contravene applicable regulations
- Suppliers are expected to be aware of and comply with anti-money laundering and tax evasion laws

**Arms and Ammunition**

- Our suppliers are expected not to be involved or deal with those who are involved in the production, sale and distribution of arms and ammunition

**Environment**

- All suppliers comply with applicable environmental laws, regulations and standards and must actively seek to minimise the environmental impact of their activities, for example consumption of resources, air pollution, water and energy efficiencies, recycling and waste management and the management of hazardous materials
- Whatley Manor does not deal with those involved in non-sustainable exploitation of resources and harmful activities in forestry, agriculture, mining and fuel industries and expects the same approach by all suppliers

Whatley Manor expects all suppliers to adopt an ethical and sustainable approach to the purchase of goods and services in line with our own socially responsible and sustainable approach to business practices and strive to make positive social and environmental impacts. Whatley Manor nor its suppliers will deliberately make misleading or false claims about environmental actions and performance.

We may amend or modify this Supplier Code of Conduct from time to time. In the event of any changes, these changes will be notified to all suppliers in writing and an updated signed copy will be required.

We may carry out an audit at your premises if we have clear grounds (supported with evidence) to suspect supplier non-compliance with this code. Any such audit shall be with the supplier’s prior consent and on giving reasonable advance notice. If an audit is agreed, we will ensure that the conduct of the audit does not unreasonably disrupt the supplier (or delay the provision of the goods and services by the supplier) and we shall bear our own costs in respect of the audit.

We reserve the right to terminate our relationship found to be in violation of these principles.

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**Supplier Confirmation of agreement to comply with Whatley Manor’s Supplier Code of Conduct**

We hereby confirm our commitment to this supplier code of conduct and confirm that we carry out similar due diligence steps regarding our own supply chain in order to supply us with goods and services.

**Name:** .....

**Signed:** .....

**Position:** .....

**For and on Behalf of** ..... (Company Name)

**Dated:** .....