



## **Modern Slavery and Human Trafficking Policy**

### **1. Basis**

- 1.1 This Policy is adopted by Maybourne Hotels Limited, on behalf of itself and the Hotels which it operates including Claridge's Hotel, The Connaught Hotel, The Berkeley Hotel, The Maybourne Riviera, The Maybourne Beverly Hills and The Emory (together 'Maybourne' or 'we').
- 1.2 Maybourne values its reputation and is committed to conducting its business with integrity and in an ethical manner. This includes ensuring that our business respects human rights. Specifically, we are committed to combatting modern slavery and human trafficking.
- 1.3 The Modern Slavery Act 2015 (MSA) defines modern slavery as slavery, servitude, forced or compulsory labour, and human trafficking. It can take many forms, including forced labour, forced marriage, child labour, and sexual exploitation.
- 1.4 Modern slavery and human trafficking are criminal offences and constitute violations of fundamental human rights. Corrupt acts expose Maybourne's business and its employees to the risk of prosecution, fines and imprisonment, as well as endangering Maybourne's reputation.
- 1.5 Maybourne aligns itself to the highest legal standard in regard to this policy framework, namely the United Nations Trafficking in Persons Protocol, The International Labour Organization Forced Labour Convention and The United Nations Convention on the Rights of the Child.

### **2. Objectives and applicability**

The purpose of this Policy is to set out the responsibilities of all of our employees and suppliers in observing and upholding Maybourne's position, which is one of zero tolerance, on modern slavery and human trafficking. This Policy applies to all areas of our business.

### **3. Policy**

- 3.1 This Policy prohibits the condoning of modern slavery and human trafficking taking place in Maybourne's business or within its supply chain.
- 3.2 Maybourne ensures its suppliers around the world adopt the same ethical business standards and human rights compliance that it supports. Our Supplier Code of Conduct, which is communicated periodically to our suppliers, establishes guidelines for our suppliers to follow when carrying out their responsibilities. It provides that suppliers support and respect the protection of internationally proclaimed human rights, including working conditions, employee welfare, and health and safety within their own workforce and throughout the supply chain.
- 3.3 We conduct a risk-based assessment periodically as to whether modern slavery and human trafficking may be taking place in our business. Maybourne has implemented the following procedures to ensure that our employees are not vulnerable to exploitation:

- We conduct rigorous checks on all of our employees, including eligibility checks on our foreign and migrant employees.
- We maintain a central register of external recruitment agents.
- We have a whistleblowing policy which gives our people the ability to call out suspected wrongdoing.

As part of our assessment of modern slavery and human trafficking in the supply chain, we have included a supplier appraisal form to include questions on our suppliers' modern slavery and human trafficking policies and risk management processes, and questions aimed at assessing their compliance with our ethical business standards. This will be sent to all potential new suppliers and all existing suppliers to enable us to review their arrangements. We have conducted a risk-based assessment our top spend suppliers via a Supplier ESG Assessment Survey to discover potential modern slavery risks within their policies and procedures.

#### **4. Compliance with the Policy**

- 4.1 It is the responsibility of every employee, third party or contractor to read, understand and comply with this Policy.
- 4.2 The prevention, detection and reporting of modern slavery or human trafficking in any part of our business or within our supply chain is the responsibility of all those working for, or with, us. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 4.3 You must notify your manager or Human Resources, or the Group Purchasing Manager if you are a supplier of Maybourne, at the earliest possible stage if you believe or suspect that a breach of this Policy has occurred or may occur in the future.
- 4.4 If you are unsure about whether a particular act, the treatment of employees more generally, or their working conditions in any part of our business or within our supply chain constitutes modern slavery or human trafficking, you should raise it with your manager or Human Resources, or Group Purchasing Manager if you are a supplier of Maybourne.
- 4.5 We reserve the right to monitor our supplier's compliance with this Policy at any time. This could include (but is not limited to) the requirement for suppliers to provide responses to questions (whether included in our supplier appraisal form or in any other document) relating to their compliance with policies and procedures on modern slavery and human trafficking and their risk management processes on an annual basis.
- 4.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

#### **5. Communication of this Policy**

- 5.1 This Policy is communicated to all our employee during onboarding, our existing suppliers and all our potential new suppliers.
- 5.2 The communication of this Policy will be carried out primarily through the following channels:
  - Training - implementing focused training sessions for our supply and purchasing team, to give them the skills needed to assess risks in our supply chain and to communicate our values to our suppliers and potential new suppliers.
  - Employee Handbook - including our Policy in the electronic version of our employee handbook, so that our entire organisation is made

aware of our Policy and the role each employee can play in helping to combat modern slavery and trafficking.

- Induction - including a session on our Policy in our employee induction programme.
- Suppliers - sharing a copy of this Policy with our existing suppliers as well as potential new suppliers.

## **6. Breaches of this Policy**

6.1 Any breach of this Policy will be regarded as a serious matter and will, in the case of our employee, result in disciplinary action being taken.

6.2 We may terminate our relationship with our suppliers if they breach this Policy.

This policy has been reviewed and approved by the board of directors of each of Maybourne Hotels Limited, Claridge's Hotel Limited, The Connaught Hotel Limited and The Berkeley Hotel Limited.

Last updated 24 June 2024