

THE ROYAL GARDEN HOTEL POLICY AND PROCEDURE



SUBJECT:	MODERN SLAVERY (ANTI SLAVERY AND HUMAN TRAFFICKING) POLICY
DATE OF ISSUE:	April 2021

PURPOSE AND SCOPE

Modern slavery is a crime and a violation of fundamental human rights. It takes 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.

The Hotel has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Hotel is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We 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 that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the Royal Garden Hotel or on our behalf in any capacity, including team members at all levels, directors, agency workers, interns, contractors, external consultants, third-party representatives and business partners.

This policy is intended only as a statement of Royal Garden Hotel policy and management guidance, and it does not form part of any team member's contract of employment. The Royal Garden Hotel may amend it at any time.

The definitions of these terms are as follows.

Slavery: exercising powers of ownership over a person.

Servitude: the obligation to provide services is imposed by the use of coercion.

Forced or compulsory labour: work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.

Human trafficking: Arranging or facilitating the travel of another person with a view to their exploitation.

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1.0 RESPONSIBILITY FOR THE POLICY

1.1 The Company Directors have overall responsibility for ensuring this policy complies with all relevant legal and ethical obligations, and that all those under The Royal Garden Hotel's control comply with it.

1.2 The Company Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

1.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

2. RISKS

2.1 The principal areas in which The Royal Garden Hotel faces risks related to modern slavery include:

2.1.1 The Royal Garden Supply Chain and outsourced activities. The Royal Garden Hotel undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Suppliers are carefully selected and comply with the terms of the procurement guidance. We are building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier. We are invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

2.1.2 The Team Members. All the employee-relations responsibilities are under our responsibility as employer. The following policies are embedded in the hotel and support the mitigation of any risk that a team member may be subject to modern slavery.

- Right to work: Checks are carried out on all team members to ensure the documents they provide are genuine and fit to purpose, in line with legislation. These are carried out by a trained manager sympathetically and appropriately.
- Staff Handbook: This document outlines the Company code of conduct and is provided to all employees upon joining.
- Equal opportunity policy: Outlines our commitment to provide equal opportunities and embrace diversity throughout employment.
- Grievance policy: This process encourages concerns to be raised informally in the first instance in order to encourage an open and honest culture.
- Whistleblowing policy: The Royal Garden Hotel encourages all its workers to report any concerns related to the direct activities, or the supply chains of the hotel. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- Code of Conduct: The Code of Conduct sets down the actions and behaviours expected of team members when representing The Royal Garden Hotel.
- Corporate Social Responsibility (CSR) Policy: The Royal Garden Hotel's CSR policy summarises how we work responsibly with suppliers and local communities.
- Induction / Other training: We currently highlight our modern slavery obligations

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as part of our induction plan and are seeking to create an e-learning course which will require all staff to complete training on our responsibility to prevent modern slavery.

2.1.3 The Guests: As a hospitality company, we recognise that there is a risk that our hotel might be used for the sexual exploitation of adults or children, or the harbouring / movement of adults and children for the use of forced labour. We are fully supporting the Hotelier Charter in its action for positive hospitality. We are committed to increasing awareness of human trafficking and modern slavery at all levels.

3. COMPLIANCE

3.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working at The Royal Garden Hotel or under our control. You are required to avoid any activity that might lead to, or suggest a breach of policy.

3.2 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim. This list is not exhaustive:

- the person is not in possession of their own passport, identification, travel documents or bank account.
- the person is acting as though they are being instructed or coached by someone else.
- they allow others to speak for them when spoken to directly.
- they are dropped off and collected from work.
- the person is withdrawn, or they appear frightened.
- the person does not seem to be able to contact friends or family freely; and
- the person has limited social interaction or contact with people outside their immediate environment.

3.3 Within the hotel, we are committed to ensuring our properties and services are not used for the purposes of exploitation, whilst ensuring we maintain the respect and confidence of our customers

2. When employing people, we are committed to ensuring that the individuals who work for us are afforded basic human rights and employment rights and are treated with dignity and respect at all times.
3. Throughout our supply chains, we expect the same high standards from all of our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to the same high standards.
4. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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5. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager.

3.7 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

4.0 COMMUNICATION AND AWARENESS OF POLICY

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5.0 BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6.0 COVID-19

6.1 We understand that some workers may be more vulnerable to modern slavery during the coronavirus pandemic. The Royal Garden Hotel adopted government guidelines for Covid-19 secure workplaces and paying statutory sick pay in order to prevent the spread of coronavirus.

REPORTING

Should you suspect there has been a breach of this policy, this can be notified in the following ways:

By post: in confidence to Barbara Murphy, Director of HR, The Royal Garden Hotel, 2 – 24 Kensington High Street, London W8 4PT, or Jurate Idahosa, Financial Controller, The Royal Garden Hotel, 2 – 24 Kensington High Street, London W8 4PT

Anyone who suspects there may have been a breach of this policy is encouraged to put their concerns in writing and to disclose their identity to The Royal Garden Hotel, all of which will be handled in strict confidence. This will avoid delays in enabling a thorough investigation to promote a prompt conclusion to the matter raised.