

# Modern Slavery Act

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## Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 for the financial year ending 30 November 2017, and sets out the steps that Hand Picked Hotels Limited ("HPH") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). HPH are committed to combatting all forms of Modern Slavery.

## About Hand Picked Hotels Limited

HPH is a privately owned company owning and operating hotel businesses and which has its head office in England.

The group consists of 20 hotels in the UK, Jersey, and Guernsey. The business relies on the services of around 2000 people.

HPH recognises that Modern Slavery includes the risks that arise from the use of foreign and migrant labour, and from supply chains both in the UK and overseas.

## POLICIES AND PROCEDURES

The existing policies and procedures of HPH which would assist in combatting Modern Slavery include:

- Modern Slavery Policy – This reflects our commitment to acting ethically and

with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

- Code of conduct for Suppliers – Published in November 2017 and subsequently issued to all suppliers, the Code requires positive confirmation of compliance.
- Recruitment – HPH conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy – HPH has a whistleblowing policy so that all employees can raise any concerns that they might have without fear of reprisals.
- Central register of recruitment agents and supplier contracts.

HPH has a dedicated compliance team, which consists of involvement from the following departments:

- Legal/Commercial
- Human Resources
- Procurement

In the coming months, HPH intends to take additional steps including:

- Expanding due diligence on subcontractors and suppliers
- Additional Modern Slavery training across the group.

This statement was approved by the Board of Directors on 2 May 2018



Commercial Director, Hand Picked Hotels Limited



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\*\*Fees are inclusive of VAT (except in the Channel Islands. VAT does not apply in Guernsey for St Pierre Park Hotel, Spa & Golf Resort and GST is charged at L'Horizon Beach Hotel & Spa & Grand Jersey Hotel & Spa in

Jersey).

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