

MODERN SLAVERY STATEMENT

Policy on Preventing Labour Exploitation

Introduction

This statement sets out the Strand Palace Hotel's commitment and actions to developing and adopting a proactive approach to tackling modern slavery including all forms of labour exploitation within our business. This statement relates to actions and activities during the financial year 1st October 2015 to 30th September 2016.

Labour exploitation is exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation, payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims reluctant to come forward.

The hotel also recognises the responsibility that it shares with its suppliers to tackle forced labour.

Responsibility

- The General Manager has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all employees within the company comply with it.
- The Human Resources Director will be responsible for putting in place and reviewing policies and the process by which they were developed.
- **Good recruitment practice, due diligence & Investigations:** All managers including individuals involved in recruitment and allocation of work, will comply with the principles laid out in the 'Recruiter Compliance' document.
- **Training:** All managers and employees will attend training to better understand and respond to the issue of modern slavery and labour exploitation.

Policy Commitments

The Strand Palace shall ensure:

- 1) All managers will attend '*Tackling Modern Slavery & Labour Exploitation*' training and will have responsibility for complying and operating company procedures relevant to this issue.
- 2) Accept that job finding fees are a business cost, and will not allow these to be paid by job applicants. The hotel will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- 3) Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third party labour exploitation and signs to look for and have signed the '*Recruiter Compliance Principles*' document.
- 4) Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.

- 5) Ensure that employees do have the ability to freely chose employment and that no forced or bonded labour is permitted.
- 6) Payment of wages and benefits to workers and employees will meet or exceed the minimum national requirement
- 7) Workers and employees have the ability to work in an environment free of physical, psychological or verbal abuse or the threat of abuse.
- 8) Adoption of a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority, police or relevant authorities.
- 9) Provision of information on '*Tackling Modern Slavery & Labour exploitation*' to our workforce through: Workplace posters, worker leaflets, induction and other briefing & training sessions as appropriate.
- 10) Encourage and support workers to report cases of labour exploitation to a trusted manager, the Human Resources department or any of the relevant support agencies in order that the necessary investigations and actions can be taken as appropriate.
- 11) We carry out regular audits of our workforce to ensure labour exploitation is not happening in our business
- 12) Employment Agency providers and other organisations in the labour supply chain, do adopt policies and procedures consistent with preventing labour exploitation, as detailed in the '*Specific Labour Supplier Requirements*' document.
- 13) Our suppliers adhere to the highest standards of ethical conduct. Suppliers will be required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. A breach of this policy by any suppliers may result in in the termination of our relationship with them.
- 14) Any employee who breaches this policy will face disciplinary action.
- 15) No tolerance of any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf in regards to the employment of workers. Refer to the hotel's Anti-Bribery policy
- 16) Participation in collaborative initiatives focused on human rights in general, and on slavery and human trafficking in particular with 'Stronger together'.

This statement has been approved by the Hotel's Senior Management Team who will review and update it annually.



David MacRae
General Manager