

# Modern Slavery Statement

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## **Introduction**

This statement is made on behalf of Gleneagles Hotel Limited (trading as “Gleneagles”) and sets out to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

As part of the hospitality industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking, and we continue to take our responsibility very seriously during the coronavirus pandemic.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of Gleneagles.

Gleneagles is a luxury estate in Perthshire, Scotland employing over 1000 employees across nearly 50 operating departments. Alongside hotel accommodation and 9 bars and restaurants, it is home to three championship golf courses, an award-winning spa and leisure facilities, and an exhilarating array of outdoor activities.

We recognise that modern slavery offences might arise both within our own operations and, due to the nature of our business, within our supply chains.

### **Relevant policies and procedures**

We operate the following policies and procedures that describe our approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations

- ◆ **Whistleblowing policy** We encourage all our employees to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can use our confidential helpline, EthicsPoint. EthicsPoint details can be found in our employee handbook and on noticeboards around the property.
- ◆ **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.



- ◆ **Supplier/Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are 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. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- ◆ **Agency Workers policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting temporary workers from them. Having used agencies to source short term labour over this past year, we ensured that the external partner was suitably vetted in advance and that all employees had a Right to Work in the UK before being assigned to work within our business.
- ◆ **Recruitment policy** – we conduct checks on any new employees that join our business to ensure that they have the eligibility to work in the UK, so as to mitigate the risk of human trafficking or of such individuals being forced to work against their will. We completed a full Right to Work audit over the summer of 2020 to ensure we remained fully compliant and up to date. For any employee that requires a visa to work in the UK, expiry dates are required within our HR system and are checked monthly.

## **Due diligence**

We undertake due diligence when considering taking on new suppliers and review their existing suppliers. Our due diligence and reviews include:

- ◆ mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- ◆ evaluating the modern slavery and human trafficking risks of each new supplier
- ◆ reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- ◆ creating an annual risk profile for each supplier

## **Performance indicators**

We have reviewed our key performance indicators (KPIs). As a result, we are:

- ◆ requiring all employees within our organisation to complete an online training course on modern slavery every year
- ◆ developing a system to strengthen supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain. We expect this to be completed by September 2021.
- ◆ reviewing our existing supply chains, whereby we will evaluate all existing suppliers by the end of 2021.

## **Training**

We require all employees within our organisation to complete an online training course on modern slavery every year.

Our modern slavery training covers:

- ◆ our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.
- ◆ how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- ◆ how to identify the signs of slavery and human trafficking.
- ◆ what initial steps should be taken if slavery or human trafficking is suspected.
- ◆ how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation.



- ◆ what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and “Stronger together” initiative.
- ◆ what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- ◆ what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

### **Awareness-raising programme**

As well as training employees, we are raising awareness of modern slavery issues through Workplace (our internal communications platform) to educate our workforce and increase their vigilance.

The online content explains to staff:

- ◆ the basic principles of the Modern Slavery Act 2015.



- ◆ how employers can identify and prevent slavery and human trafficking.
- ◆ what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- ◆ what external help is available, for example through the Modern Slavery Helpline.

This statement was approved on 1st April 2021 by our Board of Directors, who review and update it annually.

**Conor O'Leary, Managing Director**