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Modern Slavery Act

Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 for the financial year ending 28 November 2019, 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.

HPH is committed to operating with integrity and accountability, both within its organisation and in all relationships with suppliers and other partners.

About Hand Picked Hotels Limited

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

The group consists of 19 hotels in the UK, Jersey, and Guernsey. The business relies on the services of around 2000 people. As a full service hotel operator, its activities cover, food and beverage production and service, guest reception services, housekeeping, health club and spa services delivery, administrative and

Accounting functions. The supply chain covers both central supply chains fully administered centrally, and hotel based supply chains which are overseen from the centre.

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 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 - issued to all suppliers and contractors, the Code requires positive confirmation of compliance. It has been reviewed and updated during the course of 2019
- 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.

Due Diligence

HPH will only work with suppliers who formally confirm full compliance with its policies and exhibit due diligence in monitoring their own supply chains. The demonstration of this compliance is of extreme importance, and is verified by risk

assessment through ~~hand-picked hotels~~ visits to supplier premises (as a part of the review of suppliers, their policies and by monitoring their on-line and media reputations).

Key Performance Indicators

- Number of incidents or complaints of slavery and human trafficking reported under HPH's Whistleblowing Policy or otherwise
- Number of staff trained on Anti-Slavery and Whistleblowing Policies
- Remedial actions required as a consequence of incidents or complaints recorded

Training for Staff

Training is conducted for team members to ensure an understanding of the signs of modern slavery and to explain whistleblowing. On-line training modules were developed during the course of this year and have been rolled out throughout the business, allowing us to monitor the compliance and understanding of team members regarding Modern Slavery much more easily. In addition, face to face training continues to be carried out. All senior managers attend a Health and Safety for Managers course which provides additional training. The topic is reviewed during regular HR team conference calls.

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

- Legal/Commercial
- Human Resources
- Procurement

HPH works with the Shiva Foundation to provide an additional specialist source of best practice, training, and compliance updates.

Future Steps

In the forthcoming year, HPH intends to take further (and additional) steps including:

- Expanding due diligence on contractors, subcontractors and suppliers
- Additional Modern Slavery training across the group through the development of additional on-line and face to face dedicated training courses
- Regular reviews to monitor the effectiveness of the compliance programme

This statement was approved by the Board of Directors on 22 May 2020.

Ken Arkley

Commercial Director, Hand Picked Hotels Limited



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[In Safe Hands™ \(https://www.handpickedhotels.co.uk/images/Documents/In-safe-hands.pdf\)](https://www.handpickedhotels.co.uk/images/Documents/In-safe-hands.pdf)

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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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