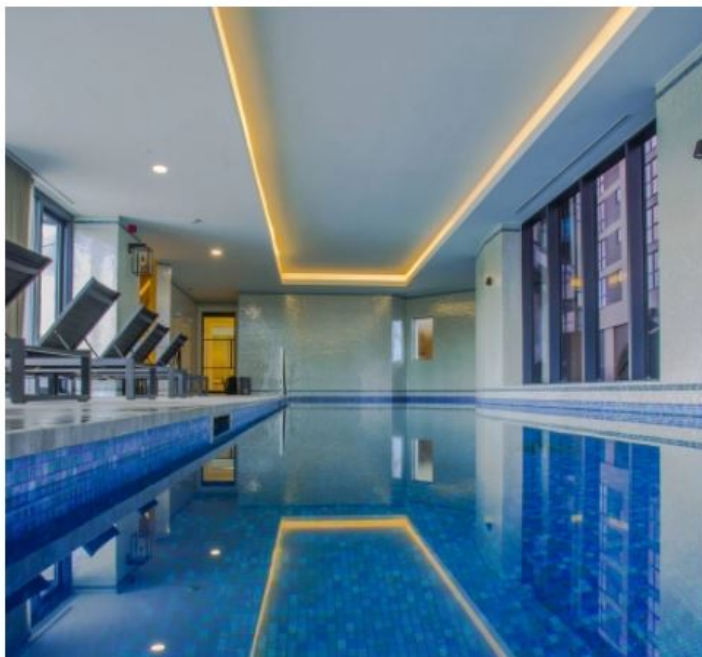


# Modern slavery act policy



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### Policy statement

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. Harbour Hotels (the "Company") have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's own business or any of the supply chains.

The Company is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of their contractors, suppliers and other business partners. As part of any contracting processes the Company include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Company expects that their suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the Company or on behalf of the Company in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

## Responsibility for the policy

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

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.

Line managers at all levels of the Company are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Directors.



## Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify a manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify a manager or a Director immediately.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chains constitutes any of the various forms of modern slavery, raise it with a manager or a Director.

The Company 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. The Company is 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 its own business or in any of the supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Company's Grievance Procedure.

## **Communication and awareness of this policy**

Training on this policy, and on the risk the Company business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

The Company's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

## **Breaches of this policy**

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

The Company may terminate any relationship with other individuals and organisations working on the Company's behalf if they breach this policy.