



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

INTRODUCTION

This statement pursuant to section 54(1) of the Modern Slavery Act 2015, sets out St James Court Hotel Ltd, actions 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 2021 to 31 March 2022. As part of the Hospitality Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The 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 St James Court Hotel Ltd, London
- St James Court Hotel Ltd, London is a subsidiary of Indian Hotels Company Limited which comprises of two hotels, St James Court Hotel and Taj 51 Buckingham Gate
- The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:
 - Recruitment
 - Eligibility to work
 - Time & Attendance
- Within the UK our suppliers are audited and assessed as part of the process and our suppliers within India itself are only used on checks carried out by the parent company.

RELEVANT POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human

trafficking in its operations:

- **Whistleblowing policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment/Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency
- **Supplier code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. This forms part of the Tata code of conduct. 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. The organisation will risk assess all suppliers, agencies and contractors with an annual contract value of £30,000 per annum or above.
- **Direct Communication:** The Company encourages members of the public or people not employed by us to write, in confidence, to the Company Secretary or the Company's Head to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's 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;
- conducting supplier audits or assessments through which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the

business relationship.

PERFORMANCE INDICATORS

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring all Managers to have completed training on modern slavery by 30th December 2021.
- Updating the system for supply chain verification to include modern slavery checks, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains, expected to be completed by 30th December 2021, whereby the organisation evaluates all existing suppliers.
- A dedicated board sub-committee of IHCL devoted to governance, compliance and corporate responsibility.

TRAINING

We require all staff, managers, within our organisation to complete training on modern slavery.

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;
- 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 staff, we have raised awareness of modern slavery issues by putting up posters across our premises.

The posters explain 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.

St James Court Hotel Ltd, continues to actively monitor its success in preventing modern slavery and human trafficking from taking place in its business and supply chains by reference to reports and alerts from our staff, the public, non-government organisations and law enforcement agencies. In general, the supply chains are limited and restricted to a specific range of key preferred suppliers, both in the UK and overseas.

APPROVAL

This statement has been approved by the Board of the organisation and will be reviewed and updated annually.

For and on behalf of St James Court Hotel Ltd, London

N Chandrasekhar

Director

April 1st, 2021

ST. JAMES' COURT, A TAJ HOTEL, LONDON

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