

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1 Basis

- 1.1 Maybourne Hotel Group values its reputation and is committed to conducting its business with integrity and in an ethical manner. This includes ensuring that our business respects human rights. Specifically, we are committed to combatting modern slavery and human trafficking.
- 1.2 Modern slavery and human trafficking are criminal offences and constitute violations of fundamental human rights. Corrupt acts expose Maybourne Hotel Group's business and its staff to the risk of prosecution, fines and imprisonment, as well as endangering Maybourne Hotel Group's reputation.

2 Objectives and applicability

The purpose of this Policy is to set out the responsibilities of all of our staff and suppliers in observing and upholding Maybourne Hotel Group's position, which is one of zero tolerance, on modern slavery and human trafficking. This Policy applies to all areas of our business.

3 Policy

- 3.1 This Policy prohibits the condoning of modern slavery and human trafficking taking place in Maybourne Hotel Group's business or within its supply chain.
- 3.2 Maybourne Hotel Group encourages its suppliers around the world to adopt the same ethical business standards and human rights compliance which it supports. Our Procurement Sourcing Policy, which we have begun to communicate to our suppliers, establishes guidelines for our suppliers to follow when carrying out their responsibilities. In particular, it provides that suppliers should support and respect the protection of internationally proclaimed human rights, including as to working conditions, worker welfare, and health and safety within their own workforce and throughout the supply chain.
- 3.3 We will conduct a risk based assessment as to whether modern slavery and human trafficking may be taking place in our business or within our supply chain. As part of that assessment, we are in the process of updating our supplier appraisal form to include questions on our suppliers' modern slavery and human trafficking policies and risk management processes, and questions aimed at assessing their compliance with our ethical business standards. This will be sent to all potential new suppliers and all existing suppliers to enable us to review their arrangements.

4 Compliance with the Policy

- 4.1 You must ensure that you read, understand and comply with this Policy.
- 4.2 The prevention, detection and reporting of modern slavery or human trafficking in any part of our business or within our supply chain is the responsibility of all those working for, or with, us. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 4.3 You must notify your manager or Human Resources, or the Group Purchasing Manager if you are a supplier of Maybourne Hotel Group, at the earliest possible stage if you believe or suspect that a breach of this Policy has occurred, or may occur in the future.

- 4.4 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions in any part of our business or within our supply chain constitutes modern slavery or human trafficking, you should raise it with your manager or Human Resources, or Group Purchasing Manager if you are a supplier of Maybourne Hotel Group.
- 4.5 We reserve the right to monitor our suppliers' compliance with this Policy at any time. This includes (but is not limited to) the requirement for suppliers to provide responses to questions (whether included in our supplier appraisal form or in any other document) relating to their compliance with policies and procedures on modern slavery and human trafficking and their risk management processes on at least an annual basis.
- 4.6 We 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.

5 Communication of this Policy

- 5.1 We have begun the process of communicating this Policy to all of our staff, our existing suppliers and all of our potential new suppliers.
- 5.2 The communication of this Policy will be carried out primarily through the following channels:
- 5.2.1 Training - implementing focused training sessions for our supply and purchasing team, to give them the skills needed to assess risks in our supply chain and to communicate our values to our suppliers and potential new suppliers.
 - 5.2.2 Staff Handbook - including our Policy in the electronic version of our staff handbook, which is soon to be launched, so that our entire organisation is made aware of our Policy and the role each member of staff can play in helping to combat modern slavery and trafficking.
 - 5.2.3 Induction - including a session on our Policy in our staff induction programme.
 - 5.2.4 Suppliers – sharing a copy of this Policy with our existing suppliers as well as potential new suppliers.

6 Breaches of this Policy

- 6.1 Any breach of this Policy will be regarded as a serious matter and will, in the case of our staff, result in disciplinary action being taken.
- 6.2 We may terminate our relationship with our suppliers if they breach this Policy.

This policy has been reviewed and approved by the board of directors of each of Maybourne Hotels Limited, Claridge's Hotel Limited, The Connaught Hotel Limited and The Berkeley Hotel Limited on 6th July 2018.

Signed



Liam Cunningham
Director