

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Maybourne Hotels Limited is publishing this statement in compliance with the Modern Slavery Act 2015 on behalf of each of Claridge's Hotel Holdings Limited ("**Claridge's**"), The Connaught Hotel Limited ("**The Connaught**") and The Berkeley Hotel Limited ("**The Berkeley**") (together the "**Maybourne Hotel Group**").

This statement details the steps taken by the Maybourne Hotel Group to aid in the prevention of modern slavery and human trafficking during the year ending 31 December 2018.

Whilst our position on modern slavery and human trafficking has always been one of zero tolerance, we did not implement any formal steps to combat it in the financial year ending 31 December 2016. As this statement and our Modern Slavery and Human Trafficking Policy (the "**Policy**") demonstrate, we take our responsibilities in this area seriously.

### About the Maybourne Hotel Group

Claridge's, The Connaught and The Berkeley are privately owned companies. Maybourne Hotel Group has its headquarters in Mayfair and manages Claridge's, The Connaught and The Berkeley, three of the world's most renowned luxury London hotels.

Maybourne hotels are committed to delivering authentic and unique guest experiences that reflect their individual nature, their guests and their people whilst maintaining a timeless elegance and intuitive service style that are the hallmarks of these properties.

For the delivery of this high quality service, Maybourne Hotel Group relies on the services of around 1,500 workers.

Maybourne Hotel Group recognises that the risks of modern slavery include the risks that arise from the use of foreign and migrant labour, and from within supply chains in the UK and overseas.

### Our policies on modern slavery and human trafficking

We are committed to conducting our 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. Maybourne Hotel Group has adopted the following procedures to assist in achieving that goal:

- **Recruitment** – we conduct rigorous checks on all of our workers, including checks on foreign and migrant workers' eligibility to work in the UK. We also maintain a central register of external recruitment agents.
- **Central register of suppliers** – we maintain a central register of all of our suppliers.

### Training and staff

Our people are the front line of our business and it is important that our staff embody the values and principles we have as an organisation. Our Policy was 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 6 July 2018, and aims to develop our staff's understanding and awareness of modern slavery and human trafficking by:

- **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 Policy to our suppliers and potential new suppliers, such that they uphold our values;

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- **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; and
- **Induction** – including a session on our Policy in our induction programme for new members of staff.

### **Our supply chain**

We are committed to selecting the very best suppliers to continue the quality, service and value our owners and guests have come to expect. We negotiate and work with many reputable suppliers to deliver products to our hotels that meet or exceed each brand's specific standards.

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 communicated 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. Our Procurement Sourcing Policy requires our suppliers to apply these principles at all times, and to be able to demonstrate that they are doing so.

In addition, we carried out a review in 2017 to establish which of our suppliers had published statements and policies under the Modern Slavery Act 2015 and have kept track of this information on our central register of suppliers. More generally, this review forms part of the due diligence process we undertake in relation to our supply chain, which also covers areas such as the origin of goods and our suppliers' compliance with best practices (e.g. in relation to the environment) and applicable industry standards (such as HACCP and relevant accreditations).

We have updated our supplier appraisal form to include questions on our suppliers' modern slavery and human trafficking policies and risk management processes, and questions aimed at assuring their compliance with our ethical business standards. This new supplier appraisal form was implemented throughout 2018, and has been sent to all potential new suppliers and all existing suppliers to enable us to review their arrangements, including any relevant policies and procedures. As part of the Policy, we require all of our suppliers to update their responses to the supplier appraisal form on an annual basis in order to monitor their compliance with our high standards and ensure alignment with our values. Through this process, we have identified and carried out further analysis of high risk suppliers in order to ensure their compliance with ethical business standards and the Modern Slavery Act 2015.

### **Our ongoing commitment**

We will continue to build upon our existing efforts to combat modern slavery and trafficking across our hotel operations and supply chain.

*This statement 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 25<sup>th</sup> June 2019*

Signed



Liam Cunningham

Director

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