



Modern Slavery Policy

Introduction

This statement sets out The Brighton Grand Hotel Operations Ltd.'s (hereafter named as The Grand) 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, labour exploitation or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1st October 2022 to 30 September 2023.

As part of the hospitality and service 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 The Grand:

- A hotel providing sleeping accommodation, operating a Restaurant, Lounge and Bar, and Meeting and Events businesses.

The organisation currently employs staff and operates in the United Kingdom only.

Responsibility

The responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Hotel Managing Director is responsible for the Policy, overseeing the implementation and reviewing on an ongoing basis.
- **Risk assessments:** The People Director & Hotel Manager are responsible for human rights and modern slavery risk analysis
- **Investigations/due diligence:** The People Director is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** The People Director is responsible for ensuring that training is provided for all relevant team members to better understand and respond to the identified slavery and human trafficking risks
- **Communication:** Managers at all levels 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.

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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

- **Right to Work Checks**

All employees employed by The Grand to work on either a temporary, fixed term or permanent basis are subject to a right to work check in line with the provisions of the UK legislation. A person is unable to commence work for The Grand unless they satisfy us that they are legally able to work within the UK. All recruiting managers must ensure that they undertake the right to work check during the interview process and that an offer of employment is only made once it has been confirmed that the prospective colleague is able to legally work in the UK.

- **Resourcing**

Where The Grand employs the services of an employment agency to source candidates for permanent or fixed term positions, we endeavour to only use agencies of good repute and who are listed on our preferred supplier list. Whilst we expect the agencies to undertake the appropriate background checks on prospective employees, recruiting managers must still conduct the right to work check and be satisfied of the candidate's legal right to work in the UK prior to an offer of employment being made. A person is unable to commence work for The Grand if they cannot provide the right to work.

- **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.

- **Whistleblowing policy**

The organisation encourages all its employees, 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 employees 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.

- **Supplier code of conduct**

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat employees 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.

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;
- taking steps to improve substandard suppliers' practices where appropriate requiring them to implement action plans if necessary.
- 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.

Training

The organisation requires all staff within the organisation to complete training on human trafficking, sexual exploitation and labour trafficking as a module within the organisation's wider training programme

The organisation's 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 the organisation;

Compliance with the Policy

Employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are

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required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees must notify their line manager or People Director as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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

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

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. We are 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If employees believe that they have suffered any such treatment, they should inform the People Director immediately. If the matter is not resolved employees should raise it formally using our Grievance Procedure.

Communication and Awareness of the Policy

Training on this policy and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us. Regular updates and/or training through webinars will be provided as necessary.

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

Breach of the Policy

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Approval

This statement has been approved by the organisation's senior leadership team members, who will review and update it annually.

Managing Director:



Hotel Manager:



People Director:



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