

DORCHESTER COLLECTION
ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

- 1.1 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.
- 1.2 These terms mean in practice:
 - 1.2.1 Slavery: behaviour which deprives the victim of his or her freedom as though the offender owns the person.
 - 1.2.2 Servitude: the obligation to provide services that is imposed by the use of coercion.
 - 1.2.3 Forced or compulsory labour: service which is exacted from a person under the menace of any penalty, where the person has not offered themselves voluntarily and involves coercion, which may be direct threats of violence or more subtle forms of compulsion.
 - 1.2.4 Human trafficking: the offence of human trafficking arises when a person arranges or facilitates the travel of another person with a view to that person being exploited, a view to exploiting them for sexual exploitation or non-sexual exploitation, even where the victim consents to the travel.
- 1.3 We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.4 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5 This Policy applies to all business partners of Dorchester Collection and all persons working for us or on our behalf in any capacity.
- 1.6 This Policy does not form part of any employee's contract of employment and we may amend this Policy at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Chief Executive Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 2.2 The Area Purchasing Manager and Human Resources 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.
- 2.3 Management 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.

3. COMPLIANCE WITH THE POLICY

- 3.1 You must ensure that you read, understand and comply with this Policy.
- 3.2 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager or Human Resources or Dorchester Collection if you are a contractor, supplier or business partner of Dorchester Collection as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future.
- 3.4 You 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.
- 3.5 If you believe or suspect a breach of this Policy has occurred or that it may occur you must report it to [your manager or Human Resources or the employee assistance helpline or Dorchester Collection if you are a contractor, supplier or business partner of Dorchester Collection] as soon as possible.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you should raise it with your manager or Human Resources or the employee assistance helpline or Dorchester Collection if you are a contractor, supplier or business partner of Dorchester Collection.
- 3.7 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.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 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, and regular training will be provided as necessary.
- 4.2 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.

5. BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy.

JUNE 2016