



SUPPLIER CODE OF CONDUCT

(Modern Slavery - Human Trafficking - Sexual Harassment)

Introduction

M.A.C. Hotels LTD – Whatley Manor Hotel is committed to acting ethically and with integrity in all of its business dealings and relationships to ensure that modern slavery and human trafficking is not taking place anywhere within our business or in any of our supply chains and that workers are treated with dignity and respect and provided with safe working conditions. We are committed to working with environmentally responsible businesses.

Hospitality is identified as a sector at risk of modern slavery which is a serious, often hidden, crime and a violation of fundamental human rights. It can take 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. We are committed to ensuring there is transparency within our own business and in our approach to tackling modern slavery, human trafficking and sexual harassment through our supply chain.

We have set our Code of Conduct, defining the minimum standards and basic principles of cooperation expected from all our suppliers, whether they supply goods, services or people.

Whatley Manor expects its suppliers to respect the rights of their employees (and volunteers) and to comply with all applicable employment legislation, regulations and directives in the countries in which they operate. In the absence of any such legislation, requirements are based on core International Labour Organization (ILO) conventions, the Ethical Trading Initiative (ETI) base code, the UN Guiding Principles on Business and Human Rights and the UNWTO Global Code of Ethics for Tourism.

Employment

- There are no victims of modern slavery working in any part of the supply chain who have been recruited, transported, transferred, harboured or received for the purposes of exploitation.
- There is no forced, bonded, indentured or involuntary prison labour.
- Workers are not required to pay fees either directly or indirectly to obtain work and are free to terminate their employment subject to reasonable notice periods.

Freedom of Association

- Suppliers must respect the rights of workers to join or not join a trade union.

Working Conditions

- Suppliers must ensure a safe and hygienic working environment and maintain a record of all accidents and incidents, in accordance with Reporting of Injuries, Diseases and Dangerous Occurrences regulations (RIDDOR).
- An accident prevention strategy should be in place and regular health and safety training must be delivered and recorded.
- Provision of clean toilet facilities, water and sanitary food storage.
- Occupational risk assessments must be in place with relevant documentation and permits regarding structural, electrical and fire safety.

Child Labour

- Suppliers may not employ child labour as indicated by local legislation - Typically, workers should be at least 15 years of age but must be at least the age for completing compulsory education in that country.
- Young persons may not be employed at night, in hazardous conditions and suppliers must comply with all relevant legislation regulating young workers,
- Suppliers must be committed to ECPAT protecting children from trafficking and exploitation.

Remuneration

- Suppliers must pay fair remuneration for both men and women for work of equal value in accordance with local employment legislation. This includes legally mandated minimum wages and benefits.
- Suppliers should not delay, withhold or defer wages legally due to its employees.

Working Hours and Annual leave

- Working hours must comply with local employment legislation and industry standards.
- Overtime hours will be voluntary, not worked routinely and fully compensated at regular or premium rates, according to local legal requirements.
- Reasonable annual leave must be given to employees in accordance with local legislation.

Diversity, Equality and Inclusion

- Suppliers must not discriminate against any worker based on age, gender, race, colour, nationality, sex, religion, sexuality, disability, marital status, sexual orientation, union membership or political affiliation.
- Suppliers will fully comply with local laws regarding equality of employment and training opportunities.

Humane Treatment and Harassment

- Suppliers must be committed to a workplace free of harassment, harm, intimidation or fear.
- Suppliers must adhere to a zero-tolerance approach to mental, physical or sexual abuse or coercion or any other such inhumane practices.
- Suppliers will develop a whistleblowing process for their workers.

NB. Whatley Manor has a strict zero tolerance approach to sexual harassment in any capacity and will not tolerate any form of sexual harassment towards our team by internal or external parties, which can occur in person or virtually. Any criminal acts will be reported to the police.

Anti-Bribery and Corruption

- Suppliers should ensure appropriate policies are in place to promote ethical business practices and to ensure the prevention, detection and reporting of bribery and corruption
- Suppliers should ensure fair practices are adopted in competing for business and that they make purchasing decisions objectively based on price, delivery, quality and other such factors
- Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. No supplier or its representatives or employees shall offer to any employer a bribe or equivalent. Suppliers should observe local custom with respect to gifts or hospitality – the value of such offers should never be considered material enough to influence business decisions or contravene applicable regulations
- Suppliers are expected to be aware of and comply with anti-money laundering and tax evasion laws

Arms and Ammunition

- Our suppliers are expected not to be involved or deal with those who are involved in the production, sale and distribution of arms and ammunition

Environment

- All suppliers comply with applicable environmental laws, regulations and standards and must actively seek to minimise the environmental impact of their activities, for example consumption of resources, air pollution, water and energy efficiencies, recycling and waste management and the management of hazardous materials
- Whatley Manor does not deal with those involved in non-sustainable exploitation of resources and harmful activities in forestry, agriculture, mining and fuel industries and expects the same approach by all suppliers

Whatley Manor expects all suppliers to adopt an ethical and sustainable approach to the purchase of goods and services in line with our own socially responsible and sustainable approach to business practices and strive to make positive social and environmental impacts. Whatley Manor nor its suppliers will deliberately make misleading or false claims about environmental actions and performance.

We may amend or modify this Supplier Code of Conduct from time to time. In the event of any changes, these changes will be notified to all suppliers in writing and an updated signed copy will be required.

We may carry out an audit at your premises if we have clear grounds (supported with evidence) to suspect supplier non-compliance with this code. Any such audit shall be with the supplier's prior consent and on giving reasonable advance notice. If an audit is agreed, we will ensure that the conduct of the audit does not unreasonably disrupt the supplier (or delay the provision of the goods and services by the supplier) and we shall bear our own costs in respect of the audit.

We reserve the right to terminate our relationship found to be in violation of these principles.

Supplier Confirmation of agreement to comply with Whatley Manor's Supplier Code of Conduct

We hereby confirm our commitment to this supplier code of conduct and confirm that we carry out similar due diligence steps regarding our own supply chain in order to supply us with goods and services.

Name:

Signed:

Position:

For and on Behalf of: (Company Name)

Dated: