



Modern Slavery Policy, including the Supplier Code of Conduct

Harrods Cornish Cottages is committed to combating modern slavery in all its forms. We recognise that modern slavery is a grave violation of human rights, and we are dedicated to ensuring that our business and supply chains are free from any form of exploitation. To uphold this commitment, we have developed the following Modern Slavery Policy:

1. Policy Statement:

- Harrods Cornish Cottages has a zero-tolerance approach towards modern slavery, human trafficking, forced labour, and any other forms of exploitation.
- We are committed to complying with all relevant laws and regulations related to modern slavery and will actively support initiatives to prevent and combat it.

2. Employee Awareness and Training:

- We provide regular training and awareness programs for our employees to ensure they understand the risks and signs of modern slavery.
- Employees are encouraged to report any suspicions or concerns promptly, and appropriate mechanisms are in place to handle such reports confidentially and effectively.

3. Supply Chain Due Diligence:

- We conduct thorough due diligence on our supply chain to identify and assess potential risks related to modern slavery.
- We engage with our suppliers and contractors to promote transparency and encourage responsible practices, ensuring they share our commitment to eradicating modern slavery.

4. Supplier Code of Conduct:

- We maintain a Supplier Code of Conduct that sets out our expectations regarding ethical conduct, human rights, and labour standards.
- We require our suppliers and contractors to comply with this code and conduct regular audits to ensure adherence.

5. Risk Assessment and Mitigation:

- We conduct ongoing risk assessments of our operations and supply chains to identify any areas where modern slavery may be present or at risk of occurring.
- Where potential risks are identified, we implement appropriate mitigation measures, including engagement with suppliers, enhanced due diligence, and audits.

6. Reporting and Whistleblowing:
 - We provide a confidential and accessible reporting mechanism for employees, suppliers, and stakeholders to report any concerns or suspicions related to modern slavery.
 - Reports are thoroughly investigated, and appropriate actions are taken, including collaboration with law enforcement agencies, if necessary.
7. Continuous Improvement:
 - We are committed to continuous improvement in our efforts to combat modern slavery.
 - We regularly review and update our policies, procedures, and training programs to reflect best practices and emerging trends in the fight against modern slavery.
8. Collaboration and Transparency:
 - We actively engage with industry partners, organisations, and initiatives focused on eradicating modern slavery.
 - We support transparency and are committed to sharing relevant information about our actions and progress in combatting modern slavery.

This Modern Slavery Policy represents our unwavering commitment to preventing and addressing modern slavery throughout our business and supply chains. We strive to create an environment that respects human rights and dignity, and we encourage all stakeholders to join us in our efforts to eliminate this abhorrent practice.

The Supplier Code of Conduct

The Supplier Code of Conduct is a set of guidelines and standards that Harrods Cornish Cottages requires its suppliers and contractors to adhere to. The purpose of the code is to ensure that our partners share our commitment to ethical conduct, human rights, and labour standards, including the eradication of modern slavery. The code outlines our expectations and serves as a framework for responsible business practices throughout our supply chain.

Key elements of the Supplier Code of Conduct may include:

1. Compliance with Laws and Regulations:
 - Suppliers are expected to comply with all applicable local, national, and international laws and regulations, including those related to labour, employment, human rights, and environmental protection.
2. Prohibition of Forced Labour and Human Trafficking:
 - Suppliers must not engage in or tolerate any form of forced labour, human trafficking, or modern slavery.
 - They should ensure that all workers are employed voluntarily, are of legal working age, and are treated with dignity and respect.
3. Fair Employment Practices:
 - Suppliers are expected to provide fair wages and benefits to their workers, in compliance with applicable laws and industry standards.
 - They should respect workers' rights to freedom of association and collective bargaining, and not discriminate based on factors such as race, gender, religion, or nationality.
4. Working Conditions and Health & Safety:
 - Suppliers must provide a safe and healthy working environment for their employees, in compliance with relevant health and safety regulations.
 - Adequate safety measures, training, and protective equipment should be provided to minimise workplace hazards and promote employee well-being.
5. Ethical Business Practices:
 - Suppliers are required to uphold high standards of business ethics, including fair competition, anti-bribery, and anti-corruption practices.
 - They should maintain accurate records, protect intellectual property rights, and respect confidential information.
6. Environmental Responsibility:
 - Suppliers should minimise their environmental impact by implementing sustainable practices, such as reducing waste, conserving resources, and managing emissions responsibly.
7. Subcontractors and Supply Chain Transparency:

- Suppliers are responsible for ensuring that their own subcontractors and suppliers comply with the principles outlined in the code of conduct.
- They should maintain transparency in their supply chain, disclosing relevant information upon request and cooperating in audits and assessments.

8. Compliance and Reporting Mechanisms:

- Suppliers are expected to establish internal mechanisms to monitor compliance with the code of conduct, including regular assessments and audits.
- They should also establish channels for reporting any violations or concerns related to the code and cooperate fully in investigations.

The Supplier Code of Conduct is a vital tool to ensure that our suppliers and contractors share our values and contribute to the ethical and sustainable practices we strive for. It helps us build strong partnerships and hold our supply chain accountable for upholding the highest standards of responsible business conduct.