



# Modern Day Slavery Statement

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## Definition

Modern day slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern day slavery can occur in various forms, including servitude, forced or 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.

## Introduction

This statement has been published in accordance with the Modern Slavery Act 2015.

It sets out the steps taken by Rocco Forte Hotels during the year ending 30 April 2024 to prevent modern day slavery and human trafficking to ensure it is not occurring in our organisation or supply chain. The Group expects the same policy to be adhered to by all of our contractors, suppliers and other business partners.

## Organisational Structure

Rocco Forte Hotels Limited (the ‘Company’) is the parent company of a global luxury hotel group which has over 2,000 employees and operates in a number of countries worldwide.

## Responsibility

The Board of Directors has overall responsibility for ensuring the Company and the wider Group complies with all legal and ethical obligations. The Group HR Director has been appointed to manage this policy on behalf of the Board of Directors and will ensure that any potential breaches of the policy and subsequent resolutions are notified to the Board for approval. Management at all levels in Rocco Forte Hotels are responsible for ensuring that those reporting to them understand and comply with the policy and are given adequate and regular training on combatting modern day slavery in our supply chain.

## Supply Chain

The Group purchases products and services from all over the world. The products and services procured are in line with items normally associated with the hospitality industry. Products and services are ideally sourced from local suppliers, all of whom are considered reputable. A vetting process is in place to ensure all our suppliers comply with our standards. As part of this process, all suppliers are required to acknowledge and adhere to the Group’s Supplier Code of Conduct which expresses the Group’s view on combatting modern day slavery.

We have developed a Supplier Code of Conduct which specifies what behaviours, practices and regulations we expect to see demonstrated and complied with. It sets out the minimum standard of business behaviour expected to ensure they act in a way that is ethical, corporately responsible and compliant with applicable laws and regulations.

The Group is committed to ensuring that there is transparency in our business and our approach to tackling modern day slavery throughout our supply chain, consistent with the obligations of the Modern Slavery Act 2015.



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## Commitment

Rocco Forte Hotels recognises that the hospitality industry can play an important role in preventing the exploitation of vulnerable people. As a people-centred business, the Group works to protect the human rights of its team members, contractors and guests by regularly undertaking:

- A review of our current policies and processes to ensure they are adequate;
- Audits that ensure management and suppliers are aware and have committed to our Supplier Code of Conduct; and
- Modern day slavery training for team members across the Group.

In the forthcoming year we will continue to ensure that our team members are fully trained and our supply chain is adhering to our Supplier Code of Practice. We will do this by:

- Continually monitoring our policies and refreshing our Supplier Code of Conduct if appropriate;
- Ensuring our training materials are specific to our hotels and the regions in which we operate;
- Continuing to deliver modern day slavery training as a part of our induction process for all new starters;
- Ensuring all team members continue to receive regular refresher training;
- The supplier vetting process will continue to be reviewed in each hotel as part of internal process reviews to ensure the Group's policies are adhered to;
- Suppliers will continue to be reviewed and approved by management of an appropriate seniority as part of the supplier vetting process; and
- Encouraging all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation; this includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The introduction of our whistleblowing hotline to support our whistleblowing procedures is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our [confidential helpline](#).

The Group will immediately investigate any alleged incidents or complaints of slavery and human trafficking reported. In accordance with the legislation, we will publish an updated Modern Day Slavery Statement each financial year in order to show our continued commitment in playing our part in preventing slavery and human trafficking.

Any queries relating to this modern slavery statement should be addressed to the Group HR Director.

This Modern Day Slavery Statement was approved by the Chairman of Rocco Forte Hotels Limited on behalf of the Company and Group in July 2024.

For and on behalf of Rocco Forte Hotels Limited  
July 2024