

Estelle Manor

MODERN SLAVERY STATEMENT

INTRODUCTION

This statement is made on behalf of Estelle Manor Limited (trading as “Estelle Manor”) and sets out 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 or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

As part of the hospitality industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking, and we continue to take this responsibility very seriously.

Our organisation is absolutely committed to preventing slavery and human trafficking in all its activities and endeavours, and to ensuring its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of Estelle Manor.

Estelle Manor is a British brand focused on luxury hospitality and adventure. With 580 employees, its operation encompasses an 85-acre estate with four restaurants, a 3,000 sq metre bathhouse spa, 108 bedrooms and a clubhouse with 250 sq m gym, studio, boutique and kids’ club, as well as an Adventure Lodge with a number of outdoor activities.

We recognise that modern slavery offences might arise both within our own operations and, due to the nature of our business, within our supply chains.

RELEVANT POLICIES AND PROCEDURES

We operate the following policies and procedures that describe our approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in our operations.

- **WHISTLEBLOWING POLICY:** We encourage all our employees 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. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can use our confidential helpline.
 - **EMPLOYEE CODE OF CONDUCT:** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.
 - **GRIEVANCE POLICY:** Our grievance procedure provides employees with a formal channel to raise serious workplace problems and complaints – including those pertaining to unfair or illegal treatment of themselves or others – leading to a fair and impartial investigation and resulting in a resolution.
 - **SUPPLIER/PROCUREMENT CODE OF CONDUCT:** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker’s working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
 - **RECRUITMENT POLICY:** we conduct mandatory Right to Work checks on every single employee who joins our business. We also conduct a monthly Right to Work audit to ensure all current employees continue to have the eligibility to work in the UK, so as to mitigate the risk of human trafficking or of such individuals being forced to work against their will.
 - **AGENCY WORKERS POLICY:** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting temporary workers from them. Having used agencies to source short term labour over this past year, we ensured that the external partner was suitably vetted in advance and that all employees had a Right to Work in the UK before being assigned to work within our business.
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DUE DILIGENCE

We undertake due diligence when considering taking on new suppliers and review their existing suppliers. Our 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.

PERFORMANCE INDICATORS

We have reviewed our key performance indicators (KPIs). As a result, we are:

- Requiring all employees within our organisation to complete an online training course on modern slavery every year.
- A system through our purchasing standard terms and conditions and supplier code of conduct to strengthen supply chain verification, where we evaluate potential suppliers before they enter the supply chain.
- Continual review of our existing supply chains, whereby we will evaluate all existing suppliers through supplier engagement meetings, on site visits and through our purchasing standard terms and conditions.

TRAINING

All employees are assigned a modern slavery training course when they join us and are required to complete this as part of their mandatory onboarding eLearning. They are required to repeat this training every three years.

Our modern slavery training for employees covers:

- Understanding what modern slavery is, and what forms it can take
- The extent of the issue worldwide
- The importance of looking out for signs of modern slavery
- How to recognise potential signs of modern slavery
- Understanding that modern slavery can involve both guests and colleagues in
- What to do if a potential case of modern slavery is suspected or witnessed
- How to be proactive vigilant against this form of criminal activity

Our modern slavery training for managers covers:

- Being able to define modern slavery
- Understanding more about victims of modern slavery
- Understanding more about perpetrators of modern slavery
- Being able to identify signs of modern slavery
- Knowing how to manage a potential incident of modern slavery
- Being able to create and disseminate a modern slavery statement
- Understanding what malpractice looks like in suppliers and know how to avoid it

This statement was approved on 7th January 2025 by our Board of Directors, who review and update it annually.

Michael Thomas Ryan
MANAGING DIRECTOR

