



### **Modern Slavery Policy Statement**

Whites of Winchester is a multi-disciplinary design and management practice, directing the development, design and delivery of cultural and commercial attractions, brand environments and experiences.

Whites of Winchester remains committed to endeavouring to ensure that its business activities and supply chains are free from any kind of slavery, human trafficking or forced labour. Underpinning this commitment in 2020, Whites of Winchester published its Modern Slavery Policy. This policy is reviewed annually. HATTO continues to undertake risk assessments and audits of suppliers in its EMEA operations. Since launching the policy in 2017, we have not identified any high risk or areas of concern from the risk assessments and audits. We continue to assess and audit new and existing suppliers across the global business operation. Annual on-line training in Modern Slavery is mandatory for all employees and includes a questionnaire to verify their understanding of their responsibilities with regards to suppliers and the wider supply chain. In 2019, new due diligence procedures were introduced for new suppliers to the business. Supplier contracts and terms and conditions have been amended to improve appropriate due diligence on suppliers from a modern slavery, anti-bribery, information security, harassment and whistleblowing perspective. Further improvements and engagement with higher risk suppliers are scheduled for 2020. This statement is made pursuant to Section 54 of the UK's Modern Slavery Act 2015. The statement is made on behalf of our UK business; however, all principles are shared with our partners.



## Modern Slavery Policy

- Introduction

Whites of Winchester ('Whites of Winchester') is committed to ensuring that its business activities, workforce and supply chains are free from any kind of slavery, forced labour and human trafficking.

- Directly employed workers

Whites of Winchester observes all relevant legislative provisions related to employment in all countries in which it operates. Workers employed directly by Whites of Winchester will be contracted under appropriate employment related legislation in the relevant country of business operation.

- Supply chains

Whites of Winchester requires its suppliers to adhere to the following provisions and to seek no less favourable provisions from their suppliers:

- All work must be voluntary and workers have the freedom to terminate their employment given notice of reasonable length.
- Workers' personal freedom of movement shall not be unreasonably restricted. They shall not be physically confined to the workplace or to recruiter-operated residences; nor shall any other coercive means be used to restrict personal freedom.
- Workers shall be treated fairly and equally.
- Workers are provided with written terms detailing work and employment conditions in a language they understand.
- Workers shall be paid at least the minimum wage required by applicable national laws and they shall receive any legally mandated benefits.
- Disciplinary policies shall not include any inhumane measures or sanctions. The use or threat of physical or sexual violence, harassment and intimidation against a worker, or his/her family is prohibited.

- Grievance/Complaint Procedures Any complaints by workers employed directly by Whites of Winchester should be raised through local business grievance/complaints procedures. Whites of Winchester requires all suppliers to ensure that there is an effective grievance or complaint procedure available to their workers, in order that they can submit any complaints without suffering prejudice or retaliation. Suppliers are required to ensure that their suppliers also provide effective complaint procedures.

- Private employment agencies and labour recruiters

Whites of Winchester encourages its subsidiary businesses and suppliers to hire workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, checks must be taken to ensure that the agencies/suppliers engaged operate legally, are certified or licensed by the competent authority where appropriate, and do not engage in fraudulent behaviour that places workers at risk of labour exploitation.