



## **SIR RICHARD SUTTON LIMITED**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

#### **INTRODUCTION**

Sir Richard Sutton Limited is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This statement sets out the actions we have taken to understand the risks to our business and puts in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chains.

#### **OUR BUSINESS**

Sir Richard Sutton Limited manages and owns a portfolio of trading assets and businesses in the hotels, property and farming sectors.

Our supply chains (the people or companies we purchase goods or services from) generally operate in the United Kingdom, Europe and Illinois, U.S.A. However, the core of our workforce is UK-based.

#### **OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING**

As part of our commitment to preventing modern slavery and human trafficking, we have implemented an Anti-Slavery Policy. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

All recruitment practices will support only employing or engaging individuals who are suitable and legally entitled to fulfil the relevant role. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we will provide training to our staff that is adequate and relevant, based on the nature and responsibilities of their role.

Goods and services will be purchased which are produced and delivered under conditions that do not abuse or exploit any people. These considerations will form part of the procurement process for all goods and services purchased by us. We build long-standing relationships with our suppliers, sub-consultants and subcontractors and make clear our expectations of business behaviour. We encourage anyone, including employees, consultants, contractors and suppliers, to report in good faith any issues or concerns about potential or possible ethics, human rights, legal or regulatory violations, including improper or unethical business practices.

Through the implementation of these due diligence procedures, we are confident that we are assessing and monitoring the areas of risk in our business and supply chains and therefore reducing the risk of slavery and human trafficking occurring.

Some of our hotels are managed through third party hotel operators who manage the staff and customers on a day-to-day basis. We rigorously monitor their statements and policies and their performance to identify and assess potential risk areas in their operation and supply chains, to mitigate the risk of slavery and human trafficking occurring, and to monitor potential risk areas in supply chains.



SIR RICHARD SUTTON  
LIMITED



## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Our effectiveness in combating slavery and human trafficking will be measured by conducting regular risk assessments. We conducted a risk assessment during the year and we identified the areas where we were most at risk of inadvertently permitting slavery or human trafficking in our business or in our supply chains.

We provided training to directors, managers and employees to help them to identify and prevent slavery and human trafficking, and instruction in how to deal with it appropriately if found, with sensitivity towards victims and robustness towards the exploitation. We will provide ongoing training to staff and continue to monitor the performance of our hotel managers and their statements and policies on slavery and human trafficking.

We continue to monitor the performance of our suppliers to ensure that there is no slavery or human trafficking in our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sir Richard Sutton Limited's slavery and human trafficking statement for the year ended 31 March 2022. It has been approved by the board of directors.

Signed .....

C.N.B. Lacey  
Managing Director  
For and on behalf of Sir Richard Sutton Limited

20<sup>th</sup> June 2023