

# **GOODWOOD GROUP**

## **THE MODERN SLAVERY ACT 2015**

### **SLAVERY & HUMAN TRAFFICKING POLICY**

#### **Introduction**

This Policy Statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes as the Goodwood Group Slavery and Human Trafficking Policy/Statement for the current financial year ending?

#### **Organisation Structure and Business**

The Group is based at Goodwood Estate in Chichester, West Sussex, from which it operates a wide range of luxury leisure, sporting and events businesses. To run these various operations we have over 500 employees and casual workers. Due to the extremely varied nature of all our businesses, we deal with hundreds of suppliers across a very wide range of business types.

#### **Policy Statement – Our Ethos on Slavery and Human Trafficking**

The Goodwood Group is committed to combatting Slavery and Human Trafficking and takes responsibility for ensuring that its working practices comply with the Modern Slavery Act 2015. This Policy Statement 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 within our Company or subsidiaries.

#### **Due Diligence**

After conducting an audit of our business and subsidiaries to assess areas of risk and likely exposure, the likelihood and severity of risk with the Goodwood Group has been found to be negligible. As part of the Company's due diligence process, we continually monitor and adopt effective systems to ensure that the Goodwood Group does not support or deal with any business or individual knowingly involved in Slavery and Human Trafficking.

#### **Supply Chains**

We operate a zero tolerance policy to Slavery and Human Trafficking. All Directors, Heads of Department and other employees responsible for procuring external goods and services, are dedicated to ensuring that suppliers and providers always adhere to our ethos and support our compliance to the Modern Slavery Act 2015.

All employees involved in the procurement of goods and services are required to establish that they are dealing with known and trusted supply chains and to discuss the potential risks relating to any new supply chains. All supply chains have been provided with a copy of this Policy and are required to confirm their compliance with our ethos.

#### **Recruitment**

Our stringent HR policies and recruitment practices ensure compliance with The Modern Slavery Act 2015 and all other relevant employment legislation. Auditing practices are in place

for checking that all employees have the right to work in the UK. We are continually reviewing our recruitment methods throughout the business to ensure transparency. Training for those employees who are engaged in recruitment and in sourcing and managing a supply chain, ensures that Slavery and Human Trafficking are not taking place with the organisation or its' supply chain.

### **Awareness**

The Modern Slavery Act 2015 is unlikely to be relevant to the majority of our employees as they are not involved in the procurement of goods or services. Regardless, this policy is available to access on our internal public drive.

The employees involved of likely to be involved in the procurement of goods and services have been specifically provided with a copy of the Policy and instructed to ensure that their suppliers have been notified and have confirmed their compliance.

### **Reporting**

If an employee has any concerns regarding a likely risk of, or actual breach of our Policy or the Legislation, this must be raised with Kate Palka, Legal Director or Liddy Swan, Group Head of People and Development on 01243 755000.

Reporting can also occur in accordance with the Grievance Policy in general or with the Whistleblowing section of the Grievance Policy in particular.

All employees involved in the procurement of goods and services must contact Kate Palka, Legal Director, if they have any concerns about Slavery or Human Trafficking or if they are aware of or suspect a breach of The Modern Slavery Act 2015.