

RESPONSIBLE PURCHASING AND PRACTICES POLICY

We are dedicated to the million details, from plants to people, homegrown in every way. It's a PIG thing. Home Grown Hotels leads the industry in doing hospitality the right way. This is the result of using the highest quality products and ingredients and operating to the highest standards in all aspects of our business.

We go beyond traditional ways of working, seeking out and partnering with suppliers that share our high standards regarding quality and service, going beyond regulation requirements and sharing our robust ethical values and commitment to the environment.

POLICY PURPOSE

Our Responsible Purchasing and Practices Policy has been designed to set out our expectations for our teams and suppliers regarding the products and services we purchase as a business. Furthermore, it is in place to offer our customers confidence knowing that Home Grown Hotels are committed to constant improvement and high standards.

This document details the way we work across our supply chain and how we make decisions relating to specific areas.

APPLICABILITY / SCOPE

Suppliers - This policy provides the standard of working expected to look after and sustain the Home Grown Hotels' supply chain. Working together, we can continue to make a positive impact in our local communities through the purchases we make from you, in line with the standards outlined in this document.

Guests - We are proud to show you where our produce grows in our Kitchen Gardens and displaying our suppliers on your menu. This document is here to provide you with any extra information to reassure you of the standards Home Grown Hotels and our suppliers uphold, always operating to have a positive social and environmental impact in our local communities.

Employees - We are dedicated to making THE PIGs inspiring, exciting and fun places to work and we are committed to the million details. This policy is available to you to see how our caring approach runs through our purchasing process and our suppliers' dedication to the standards below.

Version history

Version	Date
1.0	2022

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Standards focus areas

- Visits and Supplier Collaboration
- Sourcing
 - Local Sourcing
 - Agriculture
 - Meat
 - Dairy
 - Sustainable Fish and Seafood
 - Global Commodities
 - Office Supplies
 - Building and Construction

Society

- Employees
- Community Support
- Healthy Eating

• Environment

- Natural Resources
- Waste Reduction

Governance

- Antibribery and Corruption
- Child Labour
- Modern Slavery

1) VISITS AND SUPPLIER COLLABORATION

Thanks to our local menu, we can regularly visit our food suppliers. We will ensure at least every two years; we will routinely be meeting up with and auditing our key food suppliers in line with the standards outlined in this document.

Collaboration is key and we enjoy working with our valued suppliers to establish best practice is through our supply chain.

2) SOURCING

Local sourcing

1.

For us, local means as close to our sites as possible and we consider that to be home-grown on site in our Kitchen Gardens, or within a 25-mile radius and this is our preferred sourcing area.

We are proud of our 25-mile menu; it means we can be transparent with our guests and staff about the provenance of our main ingredients. We require supply chain transparency to farm-level for our ingredients, including meat, dairy, vegetables, seafood, eggs, local fruit and grains.

We source most of our ingredients within a 25-mile radius, working closely with local small-scale suppliers. We work with local producers to showcase brilliant local produce. Sourcing so close to our restaurants means we can visit our producers regularly and build strong relationships with the

companies supplying our ingredients, creating a positive impact in our local areas socially, economically and environmentally - thanks to minimal food-miles.

Responsible sourcing of meat, dairy and fruit and vegetables is vital to our operations.

Moving forwards, we will continue to work with the best local suppliers, not only in terms of quality, but ethical and sustainable standards as well, with at least 80% of fresh ingredients sourced locally.

Agriculture

Our kitchen gardens are organically managed and the vegetables we purchase are all grown to high environmental standards. We regularly purchase vegetables certified by the LEAF Marque. To ensure environmentally positive farming techniques are being used, we visit all producers to assess sustainability standards.

By having close, working relationships with farmers and producers, we can ensure higher welfare meat and dairy is being supplied to us. We can understand what can be done with the product and can then choose the best they have to offer. Our own kitchen gardens are organically managed, and we regularly purchase heritage fruit and vegetable varieties

Meat

All of our meat is British and we work with our suppliers to ensure the meat we are purchasing is either: organic or free range.

When working with our meat suppliers, we ensure:

- Animal welfare standards are met
- Responsible antibiotic use is applied
- Livestock are transported in a humane way

We also purchase meat from animals traditionally considered as secondary "off" cuts (e.g. Ox heart, Pigs heads) or older animals (e.g., mutton), we regularly use unconventional cuts, we purchase wild game meat such as rabbit, pigeon, or venison and look to purchase heritage or rare-breed meats.

Dairy

All our milk, cheese and other dairy is British and we work with our suppliers to ensure all dairy products are either: RED TRACTOR or Free Range.

Sourcing meat, dairy and fruit and vegetables in a sustainable way has been an integral part of our journey since we opened the very first PIG hotel in Brockenhurst. Moving forwards, we will continue our mission to serve better, locally sourced meat and more home-grown and local vegetables, visiting suppliers and ensuring farm-level transparency in our supply chain.

Sustainable Fish and Seafood

We purchase and serve both wild and farmed fish and our supply is guided by the MCS Good Fish Guide and/or MSC certification. For our properties closer to the coast, we aim to purchase fish landing within 25miles of our restaurants and we ensure suppliers can provide full transparency down to origin, species, capture method and fishers.

Our fish supply chain must ensure:

- Zero tolerance on Modern slavery and human rights risks
- Avoidance of species rated 4 or 5 by MCS
- Avoiding fish caught by illegal, unreported or unregulated fishing boats, which may include some boats from the UK
- Environmentally damaging fishing methods are not used
- Farmed Fish is sustainably sourced and high welfare standards are met. Where possible, working to Global G.A.P standard.

We work with local fishers to ensure we are getting fresh, local seafood, caught using ethical and sustainable sourcing methods. Looking ahead, we will continue this sustainable and seasonal approach, working with local fishers, creating a flexible menu and staying up to date on the latest MCS standards.

Global Commodities

The majority of our ingredients are sourced within 25 miles. We work towards ensuring the few remaining ingredients, which fall outside of this radius, are still sourced from the UK (and as local as possible to the site). However, there are a small number of essential items that cannot be grown in our climate which we have to source from slightly further afield. As we cannot visit these suppliers with ease, we look to third-party certification, relating to positive social and/or environmental performance, as a starting point for sustainable assurance.

Sugar: Our kitchens use UK grown sugar beet, RED TRACTOR, or Fairtrade certified sugar.

Chocolate: Organically grown, or Direct Trade, or Fairtrade/Rainforest Alliance/B-Corp certified.

Exotic fruit: We do not use much in the way of exotic fruit in our kitchens and we still use some behind the bar. We source some organic fruit through Crowd Farming and are looking to move to greater volume of certified produce moving forwards.

Where possible, we like to work with small-scale producers of global commodities, with robust social support mechanisms in place in their sourcing communities.

Looking ahead, we plan to increase the number of Global Commodities purchased obtaining third party certification. The reason we look for third party certification on our global commodities is to ensure a minimum standard of supply chain quality assurance in supply chains that we cannot visit ourselves.

Office Supplies

3.

We work to operate in a sustainable manner across our operations, including our back of house and head office.

Paper: We have reduced (and will continue to reduce) the use of paper by going digital for meeting agendas and other handouts. The office paper used is FSC paper from responsible sources and EU Ecolabel.

For our menus, we use softer colours to reduce dyes required in manufacturing, vegetable-based inks, recycled FSC certified paper. Our menus are re-used as coasters and napkin rings after use, or they are recycled.

All kitchens use iPads with pre-loaded recipes, to prevent recipes being printed, potentially lost and taking up space with many folders of paper.

Printing: Printers are set to double sided, and we send used toner cartridges back to our ink supplier for recycling.

Stationary: We encourage purchasing of low plastic and/or recyclable pens across the group.

Building and Construction

Home Grown Hotels purchase and use environmentally responsible products and suppliers where feasible. All new building projects to try and incorporate environmental best practice from a buildings, plant and machinery perspective

3) SOCIETY

Employees

We care passionately about our team and work to make sure life at Home Grown Hotels is the best it can be. We are a business where people can learn, grow and develop skills that will stand them in good stead for a lifetime.

Community Support

Local Community: Supporting local is at the heart of what we do and, like our 25-mile menu, our business focuses our charitable efforts within the same radius. We support local organisations as our commitment to local runs through the whole business. By implementing this approach, our guests and staff can feel confident they are adding a positive impact to the local area.

In order to follow this method, we intend to invest our funds, time and sponsor community projects in local charitable organisations which deliver societal and environmental benefits to the communities in which we work. We do this through donating space, food, industry skills, monetary donations and collecting donations from our diners.

Across the Group, we work with the Royal Academy of Culinary Arts' "Adopt a School" programme, supporting local schools and helping children develop healthy eating habits, encouraging an enthusiasm and interest in food, cooking, food provenance and sustainability, as well as giving an insight into the hospitality industry.

International Community: At a Group level, we work to make an impact further afield with our two longstanding partnerships with Action Against Hunger and Belu. While local is central to the way we do business, we also recognise our international responsibility, to act as a force for good in our global community too.

Industry Community: We are a proud supporter of Hospitality Action, an organisation who are on-hand to help hospitality people who have found themselves in difficulty or crisis. As a leader in the hospitality industry, this partnership demonstrates best practice in supporting our peers across the wider industry. In 2015, we set up our award-winning apprenticeship programme and will continue to expand this moving forwards.

4. You can find our Charitable Giving Policy in Appendix 1.

Feeding People Well

We are so proud of our 25-mile menu and the fantastic dishes our kitchen teams produce. We work to provide the best food in terms of quality, but also care about the health and wellbeing of our guests, ensuring different dietary needs are catered for. Our Front of House teams are briefed on the dishes each day and have a clear understanding of the ingredients and the health factors and we have calorie information available for our diners.

Seasonal: We cook with the seasons and create dishes with what is locally available to us throughout the year. In addition to our charitable "Adopt a School" education work, we also educate guests and diners about healthy eating by offering walks through our kitchen gardens, with our team of expert gardeners on hand to share their knowledge.

Portion size: Clearly explaining portion size is very important to us, this ensures limited food waste and guests have a clear expectation of what their dish will look like. We offer a variety of portion sizes and these are clearly indicated on our menus. Our brilliant FOH teams are trained on the best way to explain portion size to guests.

Sugar: Thanks to our fantastic Pastry Team, we can offer an array of desserts utilising local and seasonal fruit. We consider sugar levels with all our recipes, having reduced sugar content, utilising other ingredients to add sweetness. On our dessert menu, we always have at least two "lighter desserts", which will have either reduced, or no sugar.

Drinks can contain large amounts of sugar, so we make sure our drinks menu offers a wide range of non-alcoholic drink options (not just standard soft drinks) and endless refills on sugary drinks is not a service we offer.

Children's menu: We carefully put together our children's menu, to ensure it appeals to a younger audience, but also keeping healthy eating at front of mind. There is no added salt to children's meals and their main courses contain at least two portions of vegetables. We do not add processed food items to the children's menu and make sure the vegetables are coming straight from our kitchen garden.

4) **ENVIRONMENT**

At Home Grown Hotels, we want to ensure that the impact of our guests' meals and stays is not having a large detrimental impact on the environment, as we care passionately about people and planet.

Natural Resources

Tracking Emissions: We monitor and record energy usage and plan to reduce our carbon emissions.

Tracking Water Use: We monitor and record water usage and water resource management is important to us both inside and outside our properties. We have installed flow restrictors in the showers at our properties and use low volume irrigation for growing plants and in our kitchens, employees are trained to not run dishwashers when they are not full. We will continue to reduce water use moving forwards.

Waste Reduction

By the end of 2022, all properties will have moved to a new waste collection service, which will result in zero waste to landfill.

We are aware of the importance of reducing, reusing and recycling - in that order. The hospitality industry can produce a lot of waste, which is why we are working hard to ensure Home Grown Hotels is as resourceful as possible, reducing waste wherever we can.

Reduce: We understand reducing what we consume is the best way to reduce our overall footprint as it eliminates multiple means of energy spent on transportation and manufacturing. Therefore, we take measures to limit this additional resource use, such as:

- Thanks to our 25-mile menu, our food miles are reduced
- We order items in bulk where possible
- We changed our in-room offerings and no longer supply toothbrushes and toothpaste to each room (instead we give a packet of seeds)
- In our restaurants, we do not offer plastic straws or condiment sachets
- In our kitchens, we work with suppliers to limit their packaging refusing any polystyrene packaging and any plastic trays are returned with the driver
- We have reduced our paper usage across the Group.

Reuse: Finding new uses for old items is something we love to do. Ranging from reupholstered furniture to refilling tonic bottles as oil bottles and even creating a mushroom house out of an old walk-in fridge. You will be sure to find upcycled items across the group.

Recycle: We recycle our cooking oil, compost garden waste and all our waste is sorted into glass, dry mixed recycling and general waste.

Food Waste

We segregate our food waste from our general waste and are always looking at different ways we can implement innovative ways to tackle and reduce food waste, including:

- A nose-to-tail approach with cooking
- Pickling and preserving fruit and vegetables from our kitchen gardens to last us through the colder months
- Creating a daily "Specials Board", helping to manage the extra throughput of ingredients
- Offering smaller plate options on the menu
- Composting vegetable trimmings

Moving forwards, we plan to continue to further reduce our food waste and work on an improved composting strategy across the group.

5) GOVERNANCE

As a business, we work in compliance with, and source from suppliers conforming to, all local laws and regulations, incorporating those associated with environmental and social performance. Furthermore, this document is to ensure safe working conditions, that workers are treated with respect and dignity, and that the manufacturing processes throughout our supply chain are working towards being as environmentally responsible as possible.

Antibribery and Corruption

Home Grown Hotels Group is committed to ensuring that as a company we conduct business in accordance with the highest standards of ethical behaviour and honesty. We expect all employees and suppliers to be aligned with our Antibribery and Corruption Policy (see Appendix 2).

Child Labour

Home Grown Hotels and our suppliers shall always maintain robust age verification checks to ensure there is no exploitation of children in any way and abide by UK law. All Home Grown Hotel Managers, Heads of Department and Recruiters must abide by the Young Workers, Apprentices and Work Experience guidelines (see Appendix 3).

Modern Slavery

Home Grown Hotels does not purchase any goods from, or enter into business with, any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour*, under the Modern Slavery Act 2015 (see Appendix 4 for Home Grown Hotels Modern Slavery Policy).

* According to the ILO Forced Labour Convention, 1930 (No. 29), forced or compulsory labour is: "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily." ILO.

Appendices

- 1. Philanthropy and Partnerships Charitable Giving Policy
- 2. Antibribery and Corruption
- 3. Young Workers, Apprentices and Work Experience
- 4. Modern Slavery Policy



APPENDIX 1. PHILANTHROPY & PARTNERSHIPS POLICY - CHARITABLE GIVING

1. POLICY PURPOSE

The Home Grown Hotels Philanthropy & Partnerships Policy sets out guidelines to ensure that we are supporting reputable charities and organisations.

2. APPLICABILITY/SCOPE

This applies to all Home Grown Hotels employees and all those within Home Grown Hotels managed properties.

This policy is not contractual, and the Company reserves the right to change it at any time.

3. GENERAL POLICY STATEMENT

Charitable donations by the Home Grown Hotels Group, whether in the form of money or donations in-kind (such as time, resource, money and sponsorship), are an important part of our commitment to social responsibility. This policy ensures our employees are aware of any procedures associated with charitable giving, and what steps they must take when dealing with charities or other reputable organisations receiving our support.

4. GENERAL PRINCIPLES

4.1) Local Community

4.1.i) Supporting local is at the heart of what we do and like our 25-mile menu, our hotels focus charitable efforts within the same radius. We support <u>local</u> organisations as our commitment to local runs through the whole business. Each hotel has one nominated local charity and it is at the Hotel Manager's discretion whether any additional causes are supported in line with this policy. By implementing this approach, our guests and staff can feel confident they are adding a positive impact to the local area.

4.1.ii) In order to follow this method, we intend to invest our funds, time and sponsor community projects in local charitable organisations which deliver <u>societal</u> and <u>environmental</u> benefits to the communities in which we work.

4.1.iii) Across the Group, we work with the Royal Academy of Culinary Arts' "Adopt a School" programme, supporting local schools and helping children develop healthy eating habits, encouraging an enthusiasm and interest in food, cooking, food provenance and sustainability, as well as giving an insight into the hospitality industry.

4.2) Global Community

4.2.i) At a Group level, we work to make an impact further afield with our two longstanding partnerships with Action Against Hunger and Belu. While local is central to the way we do business, we also recognise our international responsibility, to act as a force for good in our global community too.

4.2.ii) Action Against Hunger is leading the global fight against hunger, they work to save children's lives and help communities to become free from hunger. They enable people to provide for themselves, see their children grow up strong, and build a brighter future.

4.2.iii) Belu Water provides us with filtration systems which enable us to bottle still and sparkling water on-site. All profits from Belu are used to help end global water poverty; 100% of its profits go to WaterAid.

4.3) Industry

4.3.i) We are a proud supporter of Hospitality Action, an organisation who are on-hand to hospitality professionals who have found themselves in difficulty or crisis. As a leader in the hospitality industry, this partnership demonstrates best practice in supporting our peers across the wider industry.

4.4) Antibribery and Corruption

4.4.i) Home Grown Hotels Group is committed to ensuring that as a company we conduct business in accordance with the highest standards of ethical behaviour and honesty.

4.4.ii) Ensure any form of charitable giving aligns with the Home Grown Hotels Antibribery and Corruption Policy.

4.5) Screening of donations

The process follows the steps below. Initial approval takes place at a local level by Hotel Management for donations less than f_{500} GBP. Donations are then screened at Head Office. Anything over f_{500} GBP is escalated to the Managing Director for approval.

(4.5 i) Screening of donations		
<£500	>£500	
- Initial approval from Hotel Director. Include: Date, Donation, Charity name and Value. Plus, contact details: Name and Email address of recipient ("recipient" refers to individual responsible for donation. E.g., if donation is for a raffle, the "recipient" is the raffle organiser).	- Initial approval from Hotel Director. Include: Date, Donation, Charity name, Value. Plus, contact details: Name and Email address of recipient ("recipient" refers to individual responsible for donation. E.g., if donation is for a raffle, the "recipient" is the raffle organiser).	
- Send to appointed person for screening	- Send to appointed person for screening	
- Screening checklist: □ Is the organisation within ≈25 miles? □ Are they delivering societal and environmental benefits to the local community? □ Are they a registered charity? If not, please state the purpose of the organisation (e.g., school fundraising) □ Does the donation follow the HGH Antibribery and Corruption Policy? □ Internet search to check for cause for concern/corruption/negative press □ Any red flags are to be raised when seeking approval?	- Screening checklist: □ Is organisation within ≈25miles? □ Are they delivering societal and environmental benefits to the local community? □ Are they a registered charity? If not, please state the purpose of the organisation (e.g., school fundraising) □ Does the donation follow the HGH Antibribery and Corruption Policy? □ Internet search to check for cause for concern/corruption/negative press □ Any red flags are to be raised when seeking approval?	
- If screening is approved, add to donation tracker.	- If screening is approved, send to Tom Ross for final sign off. Add to donation tracker.	



APPENDIX 2. ANTI-BRIBERY AND CORRUPTION POLICY

POLICY PURPOSE

Home Grown Hotels are committed to ensuring that as a company we conduct business in accordance with the highest standards of ethical behaviour and honesty.

APPLICABILITY / SCOPE

This applies to all Home Grown Hotels employees and all those within Home Grown Hotels managed

properties (unless otherwise informed by the Group People Manager).

This policy is not contractual and the Company reserves the right to change it at any time

GENERAL POLICY STATEMENT

Home Grown Hotels prohibits the offering, promising, giving, soliciting, requesting, or accepting of bribes and takes a zero-tolerance approach to anyone involved in any form of corruption. A bribe is the offer of a financial or other advantage to another person intending that advantage to induce the person to perform improperly a relevant function or activity or to reward a person for such behaviour.

Please be aware that any employee found to be involved in any form or bribery or corruption, or failed to highlight such acts, will be seen to have committed an act of Gross Misconduct and will face disciplinary proceedings which may result in their dismissal.

Employees who conduct business in areas that are assessed as high risk will receive additional training.

It is the responsibility of all Home Grown Hotels employees to report any suspicions of bribery through the whistle blowing procedure as set out in your Employee Handbook. If we are made aware of any of our third-party suppliers or business partners providing services on behalf of Home Grown Hotels who are involved in bribery we will immediately consult legal advice which may lead to the termination of those supplier or business partner contracts.

It is only with the commitment and vigilant attention of all members of our business and our associates that we can ensure our exposure to bribery is limited and our image and reputation as an ethical and honest Company maintained.

What is Bribery:

Bribery is a form of corruption and is the act of giving something such as money or a favour, offered or given to a person in a position of trust to influence that person's views or conduct.

Bribing another individual, receiving a bribe, bribing a foreign official or failing to prevent bribery are all offenses under the Bribery Act 2010.

Gifts and Hospitality:

Home Grown Hotels prohibits the offer or receipt of gifts or hospitality whenever they could affect or perceive to affect the outcome of business transactions.

The People Team reserves the right to request detailed information or documentation regarding any gifts or hospitality.

Employees who do not act in accordance with the policy may be liable to disciplinary action and/or the termination of employment for reasons of Gross Misconduct.

If any employees feel they have received an inappropriate gift or invitation, please inform the People Team or the Hotel Director.

Guidance:

In order to provide you with some guidance on the policy we have set out below what would be acceptable or not.

Prohibited:

- · Gifts of cash
- Free international holiday trips when there is no business objective
- Lavish gifts this would include truly lavish gifts like a car
- The acceptance of gifts or hospitality where there is no business relationship, and the sole purpose is to receive a 'freebie' or where there is a conflict of interest
- When the acceptance of the gift will alter or influence the business relationship

Accepted:

- Lunches, dinners, or trips for the purpose of building business relationships or to conduct meetings
- Supplier gifts such as Christmas cakes/hampers
- Advertising material such as calendars, diaries, magazines and pens
- Corporate events such as awards evenings or seminars
- Supplier/internal samples

Further Information:

If you feel that you need further information or clarification on this Policy, please do not hesitate to speak to a member of the People Team or your HOD.



APPENDIX 3. YOUNG WORKERS, APPRENTICES AND WORK EXPERIENCE GUIDELINES

OVERVIEW

This document provides guidelines on the employment of Young Workers, Apprentices and those joining the Company for Work Experience. There are specific rules on working hours for Young Workers, these must be followed at all times. For additional support and advice on employing Young Workers please contact the People Team.

UNDER 18 WORKING HOURS

Workers, Apprentices or those undertaking Work Experience aged under 18 have extra rights to protect them because of their age.

By law, workers aged 16 or 17 must not work more than 8 hours a day and 40 hours a week. They must also have, as a minimum:

- > A 30-minute break if their working day is longer than 4.5 hours
- > 12 hours' rest in any 24-hour period in which they work (for example, between one working day and the next)
- ≥ 48 hours' (2 days) rest taken together, each week or if there is a good business reason why this is not possible at least 36 hours' rest, with the remaining 12 hours taken as soon as possible afterwards

NIGHT WORKING

As a general rule those aged 16 or 17 must not work after 10pm or before 7am. In our Industry they can work until midnight or from 4am onwards if it's necessary but this is only if:

- > There are no adult workers available to do the work
- ➤ Working those hours will not have a negative effect on the young person's education or training If they do need to work after 10pm or before 7am, the Company must make sure the young worker is supervised by one or more adult workers where necessary for their protection. They must also have enough rest at another time if they need to work during their normal rest breaks or rest periods

It's against the law for anyone aged under 18 to work between midnight and 4am.

UNDER 16 WORKING HOURS & RULES

If a worker is aged under 16, working hours are restricted further. Employers of children normally need to have a permit from the local council's education department or education welfare service. Local bylaws may also have other restrictions on working hours, conditions of work and the type of employment.

There are several restrictions on when and where children are allowed to work.

Children are not allowed to work:

- Without an employment permit issued by the education department of the local council, if this is required by local bylaws (please check your local council website for area specific information).
- > During school hours
- ➤ Before 7am or after 7pm
- > For more than one hour before school (unless local bylaws allow it)
- > For more than 4 hours without taking a break of at least 1 hour
- ➤ In any work that may be harmful to their health, well-being or education
- > Without having a 2-week break from any work during the school holidays in each calendar year

There are also special rules which only apply during term times and school holiday times. During term time children can only work a maximum of 12 hours a week. This includes:

- ➤ A maximum of 2 hours on school days and Sundays
- > A maximum of 5 hours on Saturdays for 13 to 14-year-olds, or 8 hours for 15 to 16-year-olds

During school holidays 13 to 14-year-olds are only allowed to work a maximum of 25 hours a week. This includes:

- > A maximum of 5 hours on weekdays and Saturdays
- A maximum of 2 hours on Sunday During school holidays 15 to 16-year-olds can only work a maximum of 35 hours a week.

This includes:

- ➤ A maximum of 8 hours on weekdays and Saturdays
- > A maximum of 2 hours on Sunday

PAY & RECORDING HOURS

Anyone employed above school leaving age must get paid at least the National Minimum Wage. By law, the Company must keep records of any young worker's:

> Average weekly working hours - to make sure they're not working more than 8 hours a day or 40 hours a week

- > Night work, if they do any to show they're not working during restricted hours
- ➤ Health assessments offered before starting any night work and throughout their employment. These records must be kept for 2 years from the date they were made.

WHEN YOUNG PEOPLE CAN START WORK

- By law in England, the minimum school leaving age is 16. Until they're 18 years old, school-leavers must do one of the following:
 - > Full-time education or training, such as school or college
 - ➤ Work-based learning, such as an apprenticeship
 - > Working or volunteering (for 20 hours or more a week) while in part-time education or training

WORKING HOURS & PAY FOR WORK EXPERIENCE

Someone doing work experience or an 'internship' might have the rights of either an employee or worker, depending on what terms they have agreed regarding the work to be done. This means they have the same rights as an employee or worker for working hours and rest breaks.

Someone doing work experience or an internship has the right to be paid at least the National Minimum Wage, unless they're a student on a placement during a higher education course or work shadowing as part of a school placement.

STAFF ACCOMMODATION

Workers under the age of 18 who need to live in staff accommodation must have a letter from their parents/guardian (to be held on the employees file), giving permission for their child to live in our accommodation.

There also needs to be a designated responsible person (over the age of 18) in that accommodation who will be the young workers point of contact if they have any issues or concerns. The parents/guardian must have access to the accommodation at all times should they need to visit the young worker.

RISK ASSESSMENTS

It is advisable to carry out risk assessments for all young workers or roles that will be undertaken by Young Workers.



APPENDIX 4. MODERN SLAVERY POLICY

1. POLICY PURPOSE

This policy sets out Home Grown Hotel's approach to understanding all potential modern slavery risks and the steps our employees should take if they are concerned for anyone within its own business or supply chains.

We have a zero-tolerance approach to modern slavery, we are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

2. APPLICABILITY/SCOPE

This applies to all Home Grown Hotels employees and all those within Home Grown Hotels managed properties.

This policy is not contractual, and the Company reserves the right to change it at any time.

3. GENERAL POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. As part of the Hospitality sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

4. GENERAL PRINCIPLES

4.1. What does Modern Slavery Look Like

It isn't always easy to see the signs, some examples and indications a person maybe a victim of modern slavery are outlined below; this is a non-exhaustive list, and should you have any concerns you must report these.

- Evidence of a workplace being used for accommodation (not including designated, appropriate staff accommodation)
- Workers are distrustful of authorities or questions

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- Workers look uneasy, unkempt, or malnourished Signs of psychological trauma Untreated injuries
- Evidence of control over movement (being picked up and dropped off in groups) Evidence of control over personal financial matters
- Signs of substance misuse
- Workers don't know their work/home address or basic personal information such as phone numbers and bank details.
- 4.2 What steps to take if you are concerned for a person or group of people.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all employees. You are encouraged to raise concerns to your manager or The People Team about any suspicion or concern of modern slavery at the earliest possible stage.

If you are unsure about whether your concerns constitutes any of the various forms of modern slavery, raise it with your manager or The People Team.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place.

In addition to this policy steps can be taken by employees under the Whistleblowing Policy to report or highlight concerns.