



Northumberland Estates

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking policy.

POLICY OBJECTIVES

At Northumberland Estates we have developed and published this Policy to demonstrate our commitment to implementing effective systems to prevent modern slavery and human trafficking.

DEFINITIONS

Modern Slavery – the recruitment, movement, harbouring, or receiving of human beings through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

Human Trafficking – the arranging or facilitating of travel of another person with a view that person being exploited.

POLICY STATEMENT

This statement sets out Northumberland Estates, actions 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.

Northumberland Estates, incorporating all Trusts, Companies Partnerships and other entities controlled by the Duke of Northumberland, and the Percy Family, is a multi-faceted business. In recent years it has seen the organisation diversify away from historic income streams, putting property investment, development and management at its core, but still retaining significant investment in more traditional enterprises such as farming, forestry and tourism. The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Being based in the UK with very limited direct supply chains, we see our business as ‘low risk’ in relation to the threat of slavery and human trafficking offences being committed. If, however, this risk is identified, we will carry out compliance audits on an appropriate sample size and on a regular basis.

These audits will:

- Ensure that all of our employees are paid at least the National Minimum/Living Wage and have the right to work in the UK
- Be carried out by our HR & Payroll Team
- And reported to our Directors and Trustees

Slavery and human trafficking are considered and addressed in our approach to corporate social responsibility and any concerns can be raised either by contacting our HR or Management Team.

Training on this topic will be provided to all employees who are involved in the management of our contractors and supply chains.

Northumberland Estates expects everyone working for us, with us, and on our behalf to respect, support and uphold the following commitments to safeguard against modern slavery and human trafficking.

- Northumberland Estates has a zero-tolerance approach to modern slavery within our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery is the responsibility of everyone working for us, or on our behalf. Therefore, workers must not engage in, facilitate, or fail to report any activity which might lead to, or suggest, a breach of this policy.
- Northumberland Estates strives to establish a relationship of trust and integrity with our suppliers. Our supplier selection process includes due diligence of the supplier's reputation, respect for the law, and compliance with health, safety and environmental standards.
- Northumberland Estates takes a risk-based approach to our contracting processes and keep them under review. We will assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and human trafficking in our contracts with third parties.
- If we find that employees, or individuals and organisations working on our behalf have breached this policy we will ensure that we take appropriate action, which could result in taking legal action.

Northumberland Estates will publish and regularly review this Policy, a copy of which will be available on the homepage of the company website and to all employees.

Future Progress

We understand that Modern Slavery risk is not static and will continue to review our processes to mitigate this risk in the year ahead.

R C St J Wilson
CEO