

Farncombe Estate - Human Rights Policy

Approved By: The Board of Directors and the Farncombe Executive Team

1. Commitments & Framework Alignments

Farncombe is dedicated to operating a business that serves as a force for good. We explicitly commit to respecting internationally recognised human rights across all individuals and communities affected by our own direct operations and our extended value chain.

Our operations align with the following international conventions:

- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The Universal Declaration of Human Rights (UDHR)
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- The UK Modern Slavery Act 2015

2. Policy Scope

This policy governs our behaviour on our estate, including hotel rooms, agricultural land management, spa and leisure spaces, and events. It extends to all permanent, seasonal, and agency employees, officers, workers, volunteers and interns as well as our contractors, suppliers, and booking partners who will be educated on the implementation of this policy and relevant procedures.

3. Salient Human Rights Issues

We have identified five salient human rights risks where our estate has the highest potential for impact. We proactively manage these risks and evaluate the effectiveness of our strategy to address these through ongoing due diligence and regular review:

3.1. Labour Conditions & Fair Work

- **The Risk:** Hospitality businesses generally may rely heavily on seasonal, shift-based workers who face risks of low wages or precarious contracts.
- **Our Action:** We permanently employ the vast majority of our workforce directly. We guarantee fair, transparent working schedules and ensure all employees—regardless of contract type—are paid a living wage. We treat agency workers as we would our own employees.

3.2. Forced Labour & Third-Party Agency Sourcing

- **The Risk:** Hospitality businesses may frequently utilise third-party recruitment agencies for housekeeping, agricultural maintenance, and event staffing. These are high-risk categories for modern slavery, illegal recruitment fees, and debt bondage.
- **Our Action:** We do not use third party labour to supply an outsourced workforce on the Estate – all of our employees are directly employed or have a direct contract for services if working as a consultant to the business. We do use local temporary agency staff, but the agencies are vetted, and the agency workers are treated the same as our own team whilst working on our estate. We enforce the "Employer Pays Principle," ensuring no worker pays fees to secure employment. We do not use agencies to recruit workers from abroad.

3.3. Right to Water, Sanitation, & Environmental Footprint

- **The Risk:** Massive countryside estates consume high volumes of water for laundry, commercial kitchens, landscaping, and spa amenities. Mismanagement can deplete or pollute shared local rural aquifers.

- **Our Action:** We recognize access to clean water as a fundamental human right. We deploy strict water-efficiency infrastructure to protect the surrounding community's right to a healthy environment.

3.4. Local Community Economic and Land Impacts

- **The Risk:** Estate operations could restrict local public access to traditional green spaces, or cause negative impacts to the land and environment.
- **Our Action:** We protect historic public rights of way across our estate land. We expect everyone working for or on behalf of Farncombe Estate to act responsibly towards the environment. This includes using resources efficiently, reducing waste, preventing pollution, respecting wildlife and habitats, and supporting the Estate's wider sustainability objectives. Through responsible stewardship of the land and continual improvement in our operations, we are committed to leaving the Estate in a better condition for future generations.

3.5 Privacy and Data Protection

- **The Risk:** Digital operations introduce risks to guest and employee data and privacy.
- **Our Action:** We maintain rigorous data protection policies to protect guest and employee privacy.

4. Grievance Mechanisms & Remediation

When human rights breaches occur, clear pathways to justice are vital. We protect rights-holders through transparent remediation protocols:

- **Avenue for Reporting:** Workers, suppliers, guests, and neighbours can securely report concerns anonymously through our digital whistleblowing helpline on 0808 801 0351.
- **Non-Retaliation:** We maintain a strict zero-tolerance policy against any form of retaliation or victimisation targeting whistleblowers.
- **Remediation:** If we find that our estate has caused or contributed to a negative human rights impact, we actively engage with affected stakeholders to provide timely, comprehensive, and legally robust remediation.