

## **Modern Slavery Statement**

This statement is made by Historic Royal Palaces in accordance with the Modern Slavery Act 2015. It relates to both Historic Royal Palaces and our subsidiary company Historic Royal Palaces Enterprises Limited for the financial year that ended 31 March 2025.

## **About Us**

Historic Royal Palaces is the independent charity that looks after the Tower of London, Hampton Court Palace, Banqueting House, Kensington Palace, Kew Palace and Hillsborough Castle and Gardens.

## **Our commitment to preventing modern slavery and human trafficking in our supply chains**

At Historic Royal Palaces, we take the issue of modern slavery and human trafficking seriously. We are fully committed to ensuring these practices have no place in our organisation or within our supply chains. Historic Royal Palaces will not knowingly engage with any supplier or entity involved in slavery or human trafficking.

Our three strategic pillars, Reach Further, Mean More, and Act for the Future, reflect our ambition to be a charity for everyone and guide our commitment to ethical and responsible practices, including the prevention of modern slavery and human trafficking. Rooted in equity, fairness, and access for all, these pillars underpin everything we do and aspire to do, setting clear expectations for how we work with each other, our partners, and our suppliers.

## **Our Policies**

Historic Royal Palaces has in place, and will continue to monitor and improve, processes to ensure transparency within the organisation and of those organisations which supply goods and services to us. Our internal policies detail Historic Royal Palaces' commitment to acting ethically and partnering with organisations that share that vision and can demonstrate compliance.

We continue to develop a HRP Partner Code of Conduct <https://www.hrp.org.uk/about-us/supplier-manual/> which contains a section on policies and procedures with respect to modern slavery.

We have a comprehensive safeguarding policy which we publish online and which we reference in relevant contracts with our suppliers <https://www.hrp.org.uk/about-us/policies/safeguarding-policies-and-procedures>.

All our internal policies are supported by Historic Royal Palaces' whistleblowing policy, which is based on protected disclosure legislation under the Employment Rights Act 1996. It encourages those who have concerns, including those related to modern slavery, to raise them, and protect and support them when doing so.

## **Due Diligence**

We take the following due diligence steps on new and current suppliers:

- we carry out checks that staff can demonstrate their eligibility to work in the UK and that contractors and agency staff undergo an eligibility check prior to commencing work;
- we undertake factory visits of all new retail manufacturing suppliers. We aim to conduct additional site visits to our manufacturing suppliers at least once every 18 months during the term of the contract;
- we conduct visits to principal construction suppliers prior to contracting and during the term of the contract; and
- we conduct third-party audits where the risks are judged to be higher.

## **Key risks and further steps we are taking to prevent modern slavery and human trafficking**

The majority of procurement activities we undertake are specialist in nature and do not involve traditionally high-risk activities or production and sourcing outside of the United Kingdom.

However, there are a few exceptions where risks exist, such as the purchasing of retail goods for re-sale, staff uniforms, IT equipment, cleaning, security, catering, and construction.

At the present time, Historic Royal Palaces is taking the following steps to minimise the risk of modern slavery being involved in any of its supply chains:

- we are affiliated with Electronics Watch, who protect the rights of workers in electronics global supply chains, through our membership with the London Universities Purchasing Consortium;
- we have included a section within our counter-party risk register on Modern Slavery risk which is completed for key contracts and reviewed biennially by the Audit and Risk Assurance Committee;
- we hold membership with Sedex whose role is to support businesses to operate responsibly and sustainably, protect workers and source ethically.; and
- we make use of contractual clauses to ensure compliance of both our suppliers and sub-contractors to modern slavery legislation.

## **How we measure the effectiveness of our policies and procedures**

We want to foster a culture that rewards the identification of risks and the effective mitigation and remedy of any risks and issues in our supply chain. We reflect this in our policies, including in our Whistleblowing policy.

We understand that the nature of our business means that the risks are continuously changing. We regularly review our risk assessment in this area, and we are part of a number of industry associations and procurement groups who share our values.

## **Training**

All Procurement staff are required to and pass the CIPS Ethical Procurement and Supply course, which includes learning and awareness modules on human rights abuses. The Procurement Team proudly bears the CIPS Corporate Ethics Mark which shows we as an organisation have taken proactive steps, to safeguard against unethical conduct in procurement and supply management.

We publish our Modern Slavery and trafficking awareness training video annually to all staff, alongside this statement.

## **Additional steps we will take in the coming year**

We will continue to conduct factory visits and audits of key suppliers. To help staff identify potential risks during site visits we aim to develop standard checklists and training resources. Where appropriate, we will include contractual provisions that reserve our right to carry out site visits as part of our due diligence process.

This statement was approved by the Executive Team of Historic Royal Palaces on 11 June 2025.

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**John Barnes**  
Chief Executive Officer