



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT for the financial year ended 31 December 2018

**Scope of this statement.** The Royal Automobile Club reports in accordance with the requirements under the Modern Slavery Act 2015 ('the Act') and, in accordance with best practice, also includes in its statement all companies that met the criteria since the introduction of the Act. The Royal Automobile Club Limited is the parent company, which sets the framework under which our companies operate. There is one operating subsidiary within the Group which has met the reporting criteria of the Act: Pall Mall and Woodcote Park Clubhouses Limited. For the purpose of this statement any references to 'The Royal Automobile Club' or 'the Club' includes all entities within the group.

**About the Club.** The Royal Automobile Club is one of the world's foremost private members' clubs, offering first-class facilities across two distinctly different clubhouses, built on the foundation of being the United Kingdom's oldest and most influential motoring organisation. Given the nature of the Club's business, it is considered that there is minimal risk that the Royal Automobile Club, our managers or the supply chains which support the Club's business activities are involved in, or complicit in, slavery and human trafficking. Nevertheless, we cannot be complacent and need to take a firm stance.

**Commitment.** We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in relation to all our business activities. During the year the Club reviewed and updated arrangements in place to prevent slavery or human trafficking from occurring in its businesses or supply chains, by:

- Reviewing the Terms and Conditions issued to suppliers regarding the use of forced labour which codifies the obligations and expectations that the Club has in relation to its suppliers and business, in essence a third party 'Code of Conduct'; and
- Continuing to use, and train new managers in, an e-procurement approval system which acts as a repository for all supplier terms and conditions and issues compliance requirements (including references to the Modern Slavery Act 2015) to all new suppliers.

**Supply Chain.** The Club seeks to use third parties which share the Club's values. Where we operate as a purchaser of goods or services, we expect a high level of ethical conduct from those third-party businesses with which we do business. Third parties in the Club's supply chain include suppliers of merchandise, software, food and beverages, equipment, workers, maintenance and other hospitality services.

The contractual terms and conditions that the Club puts in place with third parties are regularly reviewed and during the year have been updated to include provisions designed to ensure that any risks of modern slavery in the Club's supply chain are appropriate and effectively addressed. This has been done by including express terms requiring them to comply with the Modern Slavery Act 2015, to include similar provisions in their own contracts and to notify the Club if they become aware of any slavery or human trafficking in their own supply chains.

**Employees.** The Club's commitment to compliance with the Act applies equally to our own staff. Through our selection, recruitment, induction and training procedures and programmes, we aim to ensure that the people we employ are not subject to modern slavery and human trafficking and are afforded the rights and protections that they are entitled to by law. This includes ensuring that salaries are only paid into employee bank accounts.

During 2018, we undertook a salary benchmarking exercise (following the implementation of a pay framework in 2017) to ensure that salaries for employees were commensurate with the skills and experience required. This resulted in anomaly increases for a number of posts as part of the Club's annual salary review. The Club's pay framework complies with National Living Wage requirements (with the exception of apprentice roles).

**Link to other Club Policies and Procedures.** The Club has adopted a separate Modern Slavery and Human Trafficking Policy in accordance with this statement. The Club additionally operates various policies and procedures to assist in identifying potential modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations, including but not limited to, Whistleblowing, Recruitment and Procurement.

**Continued Commitment.** This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Royal Automobile Club's slavery and human trafficking statement. This statement relates to the financial year ending December 2018. The statement has been approved by the Board of Directors who will review and update it as necessary on an annual basis.

A handwritten signature in black ink that reads "Miles Wade". The signature is written in a cursive, slightly slanted style.

Miles Wade CBE  
Club Secretary