



DEVONSHIRE  
GROUP

## Supplier Code of Conduct

Please complete the declaration at the end of this document and return a scanned copy as soon as possible. If you have any questions, please don't hesitate to get in touch.

### **Scope**

This document is a requirement for suppliers of the Devonshire Group. The Devonshire Group comprises of the following entities:

Chatsworth Settlement Trustees (Derbyshire, Yorkshire and Sussex)  
Chatsworth House Trust  
Chatsworth Estate Trading Ltd.  
Devonshire Hotels & Restaurants Group Ltd.  
The Cavendish Hotel at Baslow  
Chatsworth House Enterprises Ltd.  
Devonshire Maintenance Fund  
Elm Tree Farm Ltd.  
Devonshire Renewable Energy Ltd.  
Devonshire Educational Trust  
The Cavendish Club  
Yorkshire Holiday Cottages

### **Context**

At the Devonshire Group, we take working conditions seriously. In line with the Group's Core Values of '*always improving*', '*decency*' and '*being inclusive*', the welfare, satisfaction and engagement of our employees and volunteers is of the utmost importance.

Unethical working practices can support or facilitate modern slavery. We recognise our responsibility to help eradicate such practices and are committed to ensuring the highest ethical standards in our own operations. We feel strongly that these values and expectations should extend to our trading relationships.

As such, we ask all suppliers to agree to the Devonshire Group Supplier Code of Conduct. This outlines our expectations around working conditions, entitlement to work and environmental protection.

The provisions relating to working conditions are built upon the Ethical Trading Initiative (ETI) Base Code. Founded on the conventions of the International Labour Organisation, the ETI Base Code is an internationally recognised set of labour standards. By adopting these standards, and asking all suppliers to do the same, we will ensure the desired standard of working conditions within our direct supply chain.

By signing up to the Devonshire Group Code of Conduct, you are confirming that you comply fully, that your employees are treated fairly and with respect, and that your operations do no harm to the environment. You also accept responsibility to notify us of any change of circumstance which may compromise your ability to comply with the Code of Conduct.

While we are not expecting you to sign on behalf of any suppliers you may work with, we hope that this exercise inspires you to ask similar, sometimes challenging, questions of your own supply chains. By signing, you confirm that you are not knowingly allowing any breach of this code with any of your own direct suppliers.



## DEVONSHIRE GROUP

### Standards of Conduct

1. Employment is Freely Chosen
  - There is no forced, bonded or involuntary prison labour.
  - Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
2. Freedom of association and the right to collective bargaining are respected
  - Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
  - The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
  - Worker representatives are not discriminated against and have access to carry out their representative functions in the workplace.
  - Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
3. Working Conditions are Safe and Hygienic
  - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
  - Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
  - Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
  - Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
  - The supplier shall assign responsibility for health and safety to a senior management representative.
4. Child labour shall not be used
  - There shall be no child labour.
  - Young persons under 18 shall not be employed at night or in hazardous conditions.
  - The supplier will always conform to the relevant International Labour Organisation standards.
5. Wage payment
  - Wages and benefits paid meet, at a minimum, national legal standards.
  - All workers shall be provided with clear, written information about their employment conditions in respect to wages before they commence their employment and about the particulars of their wages for the pay period concerned each time that they are paid.
  - Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be. All disciplinary measures should be recorded.
6. Working hours are not excessive
  - Working hours comply with national laws and are not deemed excessive by industry standards.
7. No discrimination is practised
  - There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
8. Regular employment is provided



DEVONSHIRE  
GROUP

- To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.
  - Obligations to workers under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
9. No harsh or inhumane treatment is allowed
- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
  - Suppliers will have a formal disciplinary and grievance appeal procedure with documented records of individual disciplinary hearings. Such a procedure will support fair treatment of workers.
10. Entitlement to Work
- Suppliers should only employ or use workers with a legal right to work in the country.
  - The supplier must validate, by reviewing original documents and then returning them to the workers, all workers' and employment agency workers' legal right to work.
  - Employment agencies can only supply workers registered with them.
  - The supplier is expected to establish a process that effectively monitors the provisions of this paragraph.
11. Protection of the Environment
- Suppliers shall carry out their activities in accordance with national laws, regulations, administrative practices and policies relating to the preservation of the environment of the countries in which they operate as well as in accordance with relevant international agreements, principles, objectives, responsibilities and standards with regard to the environment.

**Declaration**



DEVONSHIRE  
GROUP

Please tick as appropriate:

☐

I confirm that my organisation abides with the above Code of Conduct at all times and agree to provide written notice of noncompliance within 30 days.

☐

I cannot confirm that my organisation abides with the above Code of Conduct.

Name of organisation:

Name of representative:

Position held:

Signature:

Date:

If your organisation is a member of the Ethical Trading Initiative or another relevant network (e.g. Sedex, amfori BSCI, amfori BEPI etc.), please provide details below: