



## CENTER PARCS - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

We recognise our moral and legal responsibility in relation to modern slavery and human trafficking and we are committed to ensuring that there is no modern slavery, human trafficking or unlawful child labour in any part of our business or supply chain.

### The Center Parcs Business

Center Parcs is a leading UK and Irish short-break holiday business. We operate five holiday villages in the United Kingdom and one in Ireland. The Center Parcs group has approximately 10,000 employees in the UK and Ireland.

Our supply chain includes the procurement of goods and services necessary for the operation of the holiday villages and is made up of; goods for re-sale, goods not for re-sale, food and beverage, business and consultancy services, consumables and disposables, and construction and property.

This statement sets out the steps we have taken and intend to take to prevent modern slavery and human trafficking in our business and supply chain.

### Modern Slavery Framework

Our modern slavery framework of policies and processes include the:

- **Code of Business Conduct and Ethics** which makes it clear that we conduct our business to the highest ethical, professional and legal standards and expect all our employees and those acting on our behalf to do the same. Any breach of the Code could result in disciplinary action and dismissal. All relevant employees undertake annual training and certify their compliance with this Code;
- **Ethical Trading Policy** which aims to embed ethical standards into our business and ensure that modern slavery and human trafficking is not taking place anywhere in our supply chain. In addition, we aim to work with UK and international suppliers who treat their obligations towards modern slavery and human trafficking with the same importance that we do;
- **Whistleblowing Policy** which encourages anyone to report any concerns about employment conditions, modern slavery or wider issues. An independent external Whistleblowing Hotline is available so that disclosures can be made without fear of retaliation. This service is available to all employees, temporary workers and agency staff, as well external contractors and consultants. Calls to the confidential hotline are monitored and escalated as appropriate if further action is required. To date we have not received any calls related to modern slavery issues;
- **Anti-Bribery and Corruption Policy** which outlines our zero tolerance of fraud or bribery. This policy applies to all employees, temporary workers and agency staff and third parties acting on our behalf, as well as all suppliers. Our suppliers are required to agree to the Ethical Trading Policy, which includes the requirement to comply with anti-bribery laws;
- **Diversity and Inclusion** we are committed to ensuring that all employees are treated fairly and with dignity and respect at all times and are not discriminated against because of race,

colour, nationality, ethnic origin, religion, gender, gender reassignment, sexuality, disability, marital status, trade union membership, age or political affiliation or on the basis of being an ex-offender with a spent sentence. We aim to treat all employees, former employees, clients, suppliers and other members of the public with whom the Company comes into contact, with dignity and respect;

- **Risk Training Programme** is undertaken by all our employees and includes details about modern slavery and human trafficking. The training looks at the issues surrounding modern slavery and human trafficking, the signs to look out for and reminds our employees that they have access to the independent whistleblowing hotline, should they have any concerns;
- **Supplier Registration System** ensures that the high-risk suppliers are correctly identified as a high-risk supplier for modern slavery and human trafficking purposes based either on particular industries and production locations. High-risk suppliers are monitored to ensure that their working practices are compliant and required to re-certify compliance with our Ethical Trading Policy on an annual basis.
- **Pre-employment Checks** ensures that anyone recruited to work for Center Parcs in the UK and Ireland has the right to do so and so mitigates the risk of modern slavery for potential employees.

### **Modern Slavery in the Supply Chain**

During the pre-selection and on-boarding process, we work with any suppliers identified as high-risk to understand and mitigate the risk of modern slavery. This process includes due diligence of the supplier's reputation; compliance with health, safety and environmental standards; and the risk of modern slavery and human trafficking in the supply chain.

We operate supply chains predominantly based in the UK and Ireland and have minimal contact with the countries and sectors that are generally considered to have a risk of modern slavery and human trafficking. We take a risk-based approach to addressing matters of modern slavery and human trafficking within our supply chains, that includes assessing the risks associated with particular industries and production locations during the on-boarding process and at regular intervals with existing suppliers. This forms part of our wider due diligence assessment which includes a review of our suppliers' other policies and standards. As part of our approach to due diligence around modern slavery, we also review the prospective organisation's modern slavery statement. Where one exists, we check that the statement and underlying policies are compliant. For suppliers who do not publish a statement, we review further and to ensure that their approach to identifying and mitigating the risks of modern slavery is compliant. This ensures a consistent and rigorous approach to modern slavery across our supply chains. Additionally, this year we have sent questionnaires to all high-risk suppliers in order to review their supply chains and obtained evidence of their modern slavery audits.

### **Effectiveness and Performance**

We understand that we have an ongoing responsibility to assess and mitigate the risk of modern slavery and that these risks are evolving. We are committed to increasing our understanding of these risks and embedding policies and practices to manage the risk.

We have continued to review the effectiveness of our modern slavery framework and the effect of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains. We have not had any reported instances of modern slavery within our supply chains to date.

This statement is made by Center Parcs (Holdings 1) Limited, pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ended 21 April 2022. This is a group statement which covers the subsidiaries

that apply to the disclosure criteria of the Act, namely Center Parcs (Operating Company) Limited and CP Woburn (Operating Company) Limited.

**This statement was approved by the Center Parcs (Holdings 1) Limited Board of Directors on 17 November 2022**

A handwritten signature in black ink, appearing to read 'C. McKinlay', with a long horizontal stroke extending to the right.

**Signed**

**Colin McKinlay**

**Chief Executive Officer**

