



CENTER PARCS - MODERN SLAVERY STATEMENT

This statement is made by Center Parcs (Group Holdings) Limited (the Company), pursuant to section 54 (1) of the Modern Slavery Act 2015 (the Act) and constitutes the Center Parcs group modern slavery and human trafficking statement for the financial year ended 18 April 2024. This statement covers Center Parcs (Operating Company) Limited and CP Woburn (Operating Company) Limited, indirect subsidiaries of the Company and companies that are required to publish an annual statement under the Act.

At Center Parcs we respect the human rights of others and recognise that modern slavery is a violation of basic human rights and freedoms. We remain committed to ensuring that there is no modern slavery of any type in our business or supply chain.

Our Business and supply chain

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 10,500 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 materials and services.

Doing the right thing is essential for our guests, our colleagues, our suppliers and our business. Our work to address modern slavery is fundamental to this and to our wider approach of respecting human rights.

Our Governance

Center Parcs has strong governance structures and processes in place to support our approach to human rights, including modern slavery. The Environmental, Social and Governance (ESG) Committee (the ESG Committee) oversees strategic planning and key decisions for the business and has final approval of our Modern Slavery Statement.

The ESG Committee is chaired by the Chief Executive Officer and is made up of the members of the Operating Board and key senior managers. The Committee sets the strategy and objectives and oversees and monitors the work in relation to ESG matters. There are two working groups that report to the ESG Committee on a quarterly basis. These are the “Environmental” and “Social and Governance” groups. The groups consider and review the operational aspects of ESG matters in their respective areas.

Modern slavery is considered in detail as part of the “Social and Governance” working group. The group consists of representatives from across the business and drives the ongoing activity in the human rights and modern slavery areas.

Our Policies and Processes

We are committed to maintaining high ethical standards within our business and supply chain. We have clear policies that ensure a consistent approach to the standards and behaviours we expect

from our employees and suppliers. We realise that robust policies and processes are crucial to help us uphold human rights and prevent modern slavery. Our policies and processes include:

- **Code of Business Conduct and Ethics** - 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** - aims to embed ethical standards into our business and ensure that modern slavery 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 human rights and modern slavery with the same high importance that we do. All suppliers are required to adhere to this Policy.
- **Anti-Bribery and Corruption Policy** - outlines our zero tolerance of bribery and corruption. 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.
- **Risk Training Programme** - is undertaken by all our employees and includes details about modern slavery. The training looks at the issues surrounding modern slavery, the signs to look out for and reminds our employees that they have access to the independent whistleblowing hotline, should they have any concerns. Additional training was undertaken by the central procurement team.
- **Supplier Registration System** - ensures that the high-risk suppliers are correctly identified as a high-risk supplier for modern slavery purposes based either on particular industries or production locations. High-risk suppliers are monitored to ensure that their working practices are compliant and required to confirm compliance with our Ethical Trading Policy annually.
- **Pre-employment Checks** ensures that anyone recruited to work for Center Parcs in the UK and Ireland has the right to do so and their basic rights are protected.
- **Employee Duplicate Bank Account Check** - reporting is carried out on all employee data and flags cases for investigation based on duplicate or multiple records for bank accounts, which could indicate coercive behaviour.
- **Whistleblowing Service** – is available for anyone to report any concerns about unethical conduct including modern slavery. The independent external Whistleblowing Hotline can be used by 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.

Our due diligence and risk management

Recruitment - Whilst we recognise that the hospitality sector is regarded as a high risk for modern slavery, we believe that in relation to our direct employees the risk is low because of our approach to recruitment. We manage this risk by ensuring that the people we hire have the right to work and that their basic rights as workers are protected. We ensure new joiners are issued with a contract of employment which confirms their working hours and benefits. We rely on a few key employment agencies for temporary employees and ensure their standards and ethics align with our approach to human rights and modern slavery.

Suppliers - 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. However, we recognise that modern slavery risks could be found in our supply chain due to the manufacturer locations and products that we source e.g., cycle and uniform manufacturers. We manage this risk through our supplier pre-selection and on-boarding processes.

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 in their supply chain. We also review the prospective supplier's modern slavery statement and, where one exists, we check that the statement and underlying policies are compliant. For suppliers who are not required to publish a statement under the Act, either due to their financial turnover being below the relevant threshold or not being based in the UK, we review further and to ensure that their approach to identifying and mitigating human rights risks including modern slavery is compliant. This ensures a consistent and rigorous approach to modern slavery across our supply chains.

Additionally, we send annual questionnaires to all high-risk suppliers to review their supply chains and obtain evidence of their modern slavery audits if they have been conducted by the supplier.

Our Key Performance Indicators (KPIs) to measure effectiveness

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.

The KPIs below help summarise some of the activities and progress we made this financial year:

- Cases of modern slavery discovered at Center Parcs or via high-risk suppliers: 0
- Modern slavery issues discovered via the employee duplicate records check: 0
- Cases reported through the Whistleblowing Hotline which specifically allege modern slavery: 0
- Modern slavery suppliers' assessments conducted on high-risk suppliers: 155

This statement was approved by the Center Parcs (Group Holdings) Limited Board of Directors on 14 August 2024



Signed

Colin McKinlay

Chief Executive Officer