



## 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.

### **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 10,000 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.

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 to respecting human rights.

### **Our Policies and governance**

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 colleagues and suppliers. These policies include; health and safety, environmental management, procurement and data protection.

The Environmental Social Governance (ESG) Committee (the Committee) is chaired by the Chief Executive Officer and made up of the members of the Operating Board and key senior managers. The Committee sets the strategy and objectives in relation environmental, social and governance matters and oversees and monitors the work undertaken in these areas. There are three working groups that report to the ESG Committee. The groups consider and review the operational impacts of ESG matters in the areas of Environmental, Social and Governance. Modern slavery is considered in detail as part of the "Social" working group.

We recognise that robust policies and processes are crucial to help us uphold human rights and prevent modern slavery. We regularly assess our policies and processes to ensure their effectiveness. These policies and processes in relation to modern slavery include:

- **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 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 with the same high importance that we do. All suppliers are required to adhere to this Policy;

- **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 as 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, Equity and Inclusion** we have introduced an “everyone’s welcome” approach to ensure that everyone that comes into contact with us is treated fairly and with dignity and respect at all times;
- **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;
- **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 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 their basic rights are protected.

## **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 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. We send annual questionnaires to all high-risk suppliers in order to review their supply chains and obtained evidence of their modern slavery audits.

### **Our Key Performance Indicators 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, efforts and progress we made in 2022:

- Number of cases of modern slavery discovered at Center Parcs or in our supply chain via our due diligence work and assessments: 0
- Cases reported through whistleblowing hotline where reporters have specifically alleged a breach of the UK Modern Slavery Act 2015: 0
- Number of modern slavery suppliers' assessments conducted on high-risk suppliers: 104

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 31 August 2023**



**Signed**

**Colin McKinlay**

**Chief Executive Officer**

