

**PARK HOLIDAYS UK LIMITED**  
**MODERN SLAVERY STATEMENT - 2024**

**Chief Executive's Introduction**

At Park Holidays UK, we are committed to ethical and responsible business practices. We have zero tolerance to modern slavery, human trafficking or unlawful child labour within our business or supply chains. This statement is made in accordance with the Modern Slavery Act 2015 and covers all areas of our organisation for the financial year ending 31st December 2024. It outlines the steps Park Holidays has taken and is continuing to take to ensure we are alert to the risks of modern slavery.

*Jeff Sills,*

*CEO, Park Holidays UK Limited*

*June 2024*

**Steps Taken in 2023/4**

- **Enhanced Due Diligence:** *We have implemented a more rigorous due diligence process for selecting new suppliers and assessing their potential modern slavery risks.*
- **Supplier Code of Conduct:** *We have developed and implemented a comprehensive Supplier Code of Conduct, outlining our expectations regarding ethical labour practices. This code is mandatory for all our suppliers.*
- **Employee Training:** *We have conducted mandatory training sessions for relevant staff members to better understand and identify potential signs of modern slavery.*

**Our Business & Our Supply Chain**

Park Holidays UK, encompassing the Park Holidays and Park Leisure brands, has grown into a leading UK holiday park operator with 56 stunning locations across the country (as of this statement).

While our roots lie in the South of England, we've expanded to offer getaways in Scotland, Wales, and beyond. We offer a complete vacation experience, from the sale and rental of holiday homes (caravans, lodges, chalets, and glamping pods) to vibrant licensed clubhouses, arcades, leisure facilities, and other amenities. These cater not only to our valued holiday homeowners but also to holidaymakers who visit our parks during their operational months.

To ensure a seamless experience, we rely on a diverse and extensive supply chain encompassing numerous categories including food & beverage, cleaning, linen, property & grounds maintenance, technology, retail, materials, entertainment, and more.

**Our Policies**

We take pride in fostering a positive and ethical work environment that extends beyond the holiday experience. All new team members undergo a thorough onboarding process, including detailed checks to confirm their right to work in the UK. We verify signed employment contracts and hourly agreements, ensuring everyone is treated fairly and compensated appropriately. Furthermore, we conduct checks on personal information like banking details and home addresses as part of our commitment to preventing modern slavery and ensuring a safe and secure work environment for all.

Our commitment to ethical practices is further reinforced by a suite of internal and external policies that set out our expectations and requirements. This includes our comprehensive Employee Handbook, which embeds respect for human rights. These policies cover our due diligence and wider governance practices, outlining the standards expected of employees, suppliers, and any representatives of Park Holidays UK. Regular reviews ensure these policies remain effective, and during 2024 we are undergoing a refresh of our internal employee policies.

## **Employees & Training**

Park Holidays has a team of around 1,076 permanent employees, with around 2,000 seasonal workers joining during peak season each year. We prioritise equal opportunities, legal compliance, and preventing modern slavery in our recruitment, selection and training processes.

New and returning employees receive inductions by General Managers or designated leaders. Everyone has access to comprehensive documents including their contract and the Employee Handbook, covering statutory rights such as pay, leave, and grievance procedures. This also includes information on whistleblowing, anti-discrimination, and equal opportunities within Park Holidays. Stringent checks like right-to-work verification, DBS checks, and references are mandatory. We ensure fair and consistent pay, meeting and exceeding national living wage standards; whilst striving to understand and reduce gender pay gaps wherever possible. This applies equally to agency workers.

Park Holidays has taken pride in its Investors in People Silver Award since 2009. Anonymous staff surveys, facilitated by Investors in People, are carried out during our assessment periods.

All employees have access to online training modules and job-specific training through an online suite of work-related, health & safety and personal development modules and are available to all those who work on behalf of Park Holidays UK. All relevant training is made available to all employees with some modules being mandatory to ensure full compliance with regulations and standards (such as health & safety and data protection). Regular and frequent visits for training and business reviews are carried out by a wide range of skilled senior managers; these managers are highly visible on their visits and can be approached by any employee at any time.

Mandatory training ensures compliance with regulations including health & safety and data protection. We also have a host of internal programmes which are covered with paid time off to travel and attend, we are particularly proud of our sales and leadership internal programmes.

If we acquire a new business that has employees, our mergers and acquisitions integration practices verify that the employees have the right to work in the UK and we endeavour to complete smooth integrations into the Park Holidays UK business as quickly as we can.

## **Assessing, Managing & Mitigating Risks**

We remain aware that as Park Holidays operates in a part of the leisure industry that may be classed as an above-average risk due to the number of seasonal and part-time employees and the use of a wide range of goods and services being provided, we remain confident that all of Park Holidays' policies and procedures serve to mitigate the risk of slavery and human trafficking occurring within our organisation. We undertake due diligence when we contract with suppliers, such as continuing the operation of the Contractors' Registration Scheme. This scheme includes the Property Department issue of a Prequalifying Questionnaire (PQQ). It is structured, monitored and controlled to ensure that health & safety, codes of conduct, insurances and method statements are being applied in line with the standards expected by Park Holidays. Once approved through the PQQ scheme, suppliers and contractors are included on our preferred supplier schedule.

This ensures open working relationships, regular dialogue, and the ability to discuss the work they carry out on our behalf and the provision of their workforce or services. Training is often provided by the relevant suppliers for equipment or services provided and is vetted and frequently attended by senior Park Holidays managers. We have a questionnaire that we issue to high-risk suppliers, and we are currently reviewing our process to include a questionnaire for all our external suppliers and contractors for the remainder of 2024. Where no responses are received, reminders are sent as a follow-up action. In the event of concerns being highlighted, the information would be escalated to the relevant senior manager or Director who may take appropriate action up to and including removal from the preferred supplier's schedule. To date no such action has been required. The Questionnaire requires each supplier to confirm that their workers are paid the age appropriate NMW/NLW or above, that they are not expected to pay for PPE or uniforms, that they have written and ethical terms & conditions of employment and that the employees are free to move to take up alternative employment if they wish to do so.

### **Governance & Measuring Effectiveness**

The Board of Directors regularly meet and review our risk landscape, with key risks being highlighted and discussed at this senior level. Heads of Departments play a key role in managing modern slavery risk and take responsibility for mitigating the supplier risks identified through due diligence and delivering any action plans and responsible business practices into our sourcing activities. We have an in-house Legal & Compliance Team which is also available to provide advice and support to the business to ensure continued compliance. Oversight is additionally provided by the Internal Audit Team and the business is also subject to external audits regularly, with more focus on this now because of being part of the Sun Communities, Inc. group. We measure success and performance regularly and are continuing to evolve our set of insights to enable us to track the effectiveness of our modern slavery programme.

### **Next Steps**

For the remainder of 2024, we plan to enhance our risk and governance processes by:

- Reviewing our material and contractor supplier process and ensuring better due diligence and selection.
- Updating our employment policies to guide team members and managers at Park Holidays.
- Implementing a new electronic onboarding and recruiting platform.