

PARK HOLIDAYS UK LIMITED

MODERN SLAVERY STATEMENT - 2023

Chief Executive's Introduction

Conducting business responsibly and ethically is something that Park Holidays UK is firmly committed to and we have zero tolerance for all forms modern slavery across our business and our supply chains.

This statement, published in accordance with the Modern Slavery Act 2015 and covering all of our subsidiaries, sets out the steps we've taken during the financial year ending 31 December 2022 to identify and prevent modern slavery in our supply chain and details our plans for the 2023 financial year.

2022 has been a year of significant change for Park Holidays UK, with Sun Communities, Inc. purchasing the company, and us continuing to integrate the companies we have also purchased. We now find ourselves in the fortunate position of forming part of a significant organisation headquartered in the United States. This has strengthened our governance and compliance activities and will allow us to further advance our maturity.

I am confident that there is no evidence of modern slavery in our business and our supply chain, however, it is important that we constantly remain vigilant and continue to do our best to work towards a more inclusive and sustainable future.

Jeff Sills,

CEO, Park Holidays UK Limited

June 2023

Our Business & Our Supply Chain

Park Holidays UK Limited, trading under the brands Park Holidays and Park Leisure, has expanded to become one of the largest holiday park operators in the UK, with 56 parks at the date of writing this statement. Our geographical spread currently remains more condensed in the South of England but we also have parks in Scotland, Wales and other areas in England. The business consists of the selling and letting of holiday homes including caravans, lodges, chalets and glamping pods. The business also operates licensed clubs, arcades, leisure facilities and other leisure-related services for the benefit of our holiday homeowners and holidaymakers who come to the holiday parks during the months the parks are licensed to be open.

We have a large and diverse supply chain, with suppliers covering many categories, including food & beverages, cleaning, linen supplies, property and grounds maintenance, technology, retail, materials, entertainment and more.

Our Policies

We have a suite of internal and external policies that set out our expectations and requirements, including our Employee Handbook. These embed respect for human rights and cover our due diligence and wider governance practices, plus the standards expected of them as an employee, supplier and/or representative of Park Holidays UK. These policies are reviewed on a regular basis and are supported by internal procedures and processes which enable us to uphold these commitments.

Employees & Training

There is a core of c.1250 permanent employees and at the busiest periods of trading up to an additional c.1700 seasonal employees who work for Park Holidays, many of whom return to work at our holidays parks each holiday season. Our recruitment practices are designed to uphold equal opportunities, compliance with legislation and ensure the labour we use is free from modern slavery.

General Managers at each location, or a designated Head of Department, will undertake inductions with new, and returning, employees. All employees are provided with access to a comprehensive suite of documents, including their contract of employment and the most recent version of the Employee Handbook. The range of documents cover all aspects of an employee's statutory rights including, but not limited to, pay, annual leave and other statutory benefits. Full information is provided on how to raise a grievance, make a protected disclosure, raise any issue regarding discrimination or personal harassment and information on the equality of opportunities within Park Holidays.

Employment checks for all new, or returning, employees include confirmation of their eligibility to work in the UK, Disclosure & Barring Service checks and references. We also ensure that all Park Holidays' employees are always paid fairly and consistently, whilst striving to understand and reduce gender pay gaps wherever possible. All employees are paid at least the National Minimum Wage or National Living Wage for their age and monthly checks ensure the legal standards are consistently met. Where workers are provided via agencies, we ensure all pay and benefits are at compliant levels.

Park Holidays proudly displays its Investors in People Silver Award and has been accredited since 2009. Anonymous staff surveys, facilitated by Investors in People, are regularly carried out.

Training through an on-line suite of work-related, health & safety and personal development modules are available to all those who work on behalf of Park Holidays UK. Job-specific training is also provided dependent on role. Employees are not required to make payment for any training and are provided with paid time off to attend all relevant training. 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.

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 in to 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 issue, by the Property Department, of a Pre-Qualifying 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 also send out our Modern Slavery Questionnaire for completion by our key external suppliers and contractors. 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 on a regular basis, with more focus on this now as a result of being part of the Sun Communities, Inc. group.

We measure success and performance on a regular basis and are continuing to evolve our set of insights to enable to track the effectiveness of our modern slavery programme.

Next Steps

Over the coming year, we plan to enhance our risk and governance processes by:

- Building a Risk Assessment and Compliance Controls formal framework, including a committee of senior leaders which will be tasked with reviewing our risk register and mitigating action plans across key operational areas of the business;
- Investing in additional headcount by the recruitment of a Deputy General Counsel with significant compliance, procurement and data protection expertise to further bolster our in-house legal capabilities in this area;
- Continuing to work ethically and regularly assess our list of suppliers and contractors;
- Maintaining regular communication with our supply chain and encouraging the reporting of concerns.