



PARK HOLIDAYS UK LIMITED

MODERN SLAVERY STATEMENT 2025

Introduction

At Park Holidays UK, we are committed to ethical, transparent, and legally compliant business practices across all aspects of our operations and supply chains. We have zero tolerance for modern slavery, human trafficking, or unlawful child labour in any form. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps taken in 2024 and early 2025 — and the actions we are committed to — to prevent modern slavery risks and promote responsible business conduct across our parks and suppliers.

Our Business & Our Supply Chain

Park Holidays UK (referred to as “Park Holidays”), encompassing the Park Holidays and Park Leisure brands, is a leading UK holiday park operator with over 50 locations across England, Scotland, and Wales. While our roots lie in the South of England, our operations now serve a broad customer base of holiday homeowners and seasonal holidaymakers across the country.

Our business activities include the sale and rental of holiday homes (caravans, lodges, chalets, and glamping pods), as well as the operation of licensed clubhouses, restaurants, leisure centres, arcades, and entertainment venues. These services contribute to a full holiday experience for our guests and holiday homeowners.

To deliver these services, we engage a wide and diverse supply chain covering goods and services such as food and beverage, cleaning, linen, grounds and property maintenance, construction, IT, agency labour, retail, and entertainment. In addition to direct suppliers, we work with contractors for development, refurbishment, and site services across our parks.

As a large seasonal employer, we operate with approximately 1,150 permanent employees and expand to more than 2,900 people during peak season. This includes the use of agency workers and subcontractors in certain locations. We recognise that aspects of this model, including seasonal recruitment and outsourced services, can carry elevated modern slavery risks, and we are committed to managing these risks with appropriate oversight and due diligence.

Actions Taken in 2024-2025

During 2024 and early 2025, we took practical steps to strengthen our controls and reduce the risk of modern slavery in our business and supply chains:

- **Supplier and Contractor Requirements:** In 2024, we introduced a *New Supplier Form* to strengthen onboarding compliance with legal and internal standards. We also carried out a detailed review of our supplier due diligence processes, we developed updated documentation — including a revised *Supplier Questionnaire* and *Contractor Code of Practice* — to strengthen compliance with ethical and modern slavery standards. These updates are currently under review and will be implemented across new supplier onboarding and existing supplier re-enrolment processes during the second half of 2025.
- **Employment Practices:** We continue to apply robust recruitment and onboarding procedures designed to ensure legal compliance, ethical standards, and fair treatment of all candidates and employees. These include right-to-work verification, employment contract validation and payroll verification — all of which are consistently applied and fully auditable. Our employment contracts clearly set out key terms such as pay, working hours, holiday entitlements, grievance procedures, and whistleblowing channels. In June 2025, we launched a new digital recruitment platform to enhance the efficiency, transparency, and consistency of our hiring processes. This system helps ensure that all recruitment activity aligns with both regulatory obligations and Park Holidays’ internal standards.
- **Training:** In 2025, we began rolling out modern slavery awareness training, starting with a mandatory module for senior management and high-risk roles. A full overview of our approach is provided under the ‘Training and Awareness’ section below.
- **Handbook and Policy Refresh:** In early 2025, we launched a new *Team Member Handbook*, supported by updated key HR policies — including those relating to whistleblowing, ethical employment, and harassment. While formal written policies for recruitment and onboarding are still in development, we continue to apply robust and consistent processes that align with legal requirements and our internal standards. These updates reinforce Park Holidays’ commitment to providing a fair, respectful, and responsible working environment.

Our Policies and Internal Controls

We take pride in fostering a positive, inclusive, and ethically grounded working environment that goes beyond delivering a great holiday experience. At Park Holidays UK, we are committed to upholding human rights and promoting transparency and fairness in everything we do — from how we recruit team members to how we work with suppliers and contractors. This culture of integrity plays an important role in supporting our efforts to prevent modern slavery and uphold the rights of everyone working in or with our business.

We maintain a comprehensive framework of internal policies and procedures designed to promote ethical conduct, safeguard employee rights, and ensure compliance with all applicable employment laws and standards. These policies also support our wider governance objectives and reinforce our zero-tolerance approach to exploitation.

In 2025, we launched a new *Team Member Handbook* that consolidates and updates key HR policies, including those related to equal opportunities, grievance procedures, anti-discrimination, harassment and bullying (supported by a standalone sexual harassment policy), whistleblowing, and standards of behaviour. All our policies are regularly reviewed to ensure overall effectiveness and legal alignment.

Our recruitment and onboarding processes — including right-to-work checks, contract validation, and payroll verification — are applied consistently across the business. All employees, including temporary and seasonal staff, benefit from the same safeguards and receive clear, fair terms of employment.

Park Holidays has also taken pride in achieving the Investors in People Gold Award in 2025. As part of this accreditation, anonymous staff surveys are conducted during each assessment period to gather insights on employee engagement, workplace culture, and areas for improvement. These surveys help ensure that the voice of our workforce is heard and reflected in our ongoing policy and culture development.

To further support compliance and enhance the candidate experience, we introduced a new digital recruitment platform in June 2025. This has streamlined our recruitment workflows, improved transparency, and strengthened consistency with both legal and internal requirements. It also enhances our reporting and audit capabilities. A complementary onboarding module is in development, which will further support the efficient management of employment checks, documentation, and communications for new hires.

Alongside these developments, we are reviewing and updating our recruitment and onboarding policies to ensure they align with these new systems and reflect the latest regulatory obligations and company standards. These improvements reinforce our ongoing commitment to responsible recruitment and support the early detection of any practices that could signal potential modern slavery risks.

Looking ahead, we remain committed to continuously strengthening our employment practices. This includes regularly evaluating how key standards — such as contractual terms, training expectations, and escalation channels — are communicated and embedded across both staff and contractor relationships, in support of our broader commitment to visibility, compliance, and the prevention of modern slavery.

Training and Awareness

In 2025, we will be rolling out modern slavery awareness training, beginning with a mandatory module for senior management and high-risk roles — including HR, procurement, and site management — to build targeted awareness and support responsible decision-making in roles with elevated exposure to modern slavery risks.

This training will form part of the mandatory training programme for relevant roles and is designed to equip individuals with a practical understanding of modern slavery risks, key indicators, and the appropriate actions to take in response.

A broader training programme for all employees will be considered as part of future reviews, to support a consistent baseline of understanding across the organisation.

Beyond modern slavery-specific content, all employees have access to a suite of training modules — including mandatory compliance courses that ensure alignment with legal and internal standards, as well as personal development modules to support professional and career growth.

Training is further reinforced through regular site visits by experienced senior managers, who conduct business reviews and provide on-the-ground support for team development. These visits help maintain consistency, visibility, and open communication — all of which are vital to identifying and addressing concerns early.

We also offer internal training programmes in areas such as sales and leadership development, reflecting our broader commitment to building an informed, capable, and responsible workforce.

When we acquire a new business with existing employees, our mergers and acquisitions integration process includes right-to-work verification and ensures a smooth and timely transition into our business.

Supply Chain Risk Management and Contractor Oversight

We recognise that certain parts of our supply chain may present a higher risk of labour exploitation, particularly where work is seasonal, subcontracted, or lower-skilled. In response, we are strengthening our due diligence processes and improving supply chain transparency.

As part of our continuous effort, the Property Department operates the *Contractors' Registration Scheme* through an independent external provider — a structured system used to assess, approve, and monitor contractors engaged in work across our parks. This scheme includes the administration of a *Pre-Qualifying Questionnaire (PQQ)*, which ensures that health and safety standards, codes of conduct, insurances, and method statements are being applied in line with Park Holidays expectations. Once approved through the PQQ scheme, suppliers and contractors are added to our preferred supplier schedule and reviewed annually against their original submission.

Responses to the questionnaire are reviewed, and any non-submissions or concerns are escalated to the relevant senior manager or director, who may take appropriate action — up to and including removal from the preferred supplier list. To date, no such action has been required.

In 2024 and early 2025, we undertook a comprehensive audit of our internal processes to assess and strengthen our supplier due diligence practices. As a result, a series of targeted recommendations have been developed to enhance the supplier documentation — including declarations, certifications, and risk-related disclosures — required and collected by Park Holidays UK to support our modern slavery compliance obligations. These proposals focus on embedding ethical labour standards, improving transparency, and formalising verification procedures across our supply chain. All recommendations will be subject to review and approval by the cross-functional Modern Slavery Working Group to ensure they are practical, effective, and aligned with our broader governance framework.

Throughout the remainder of 2025, we will focus on implementing updated due diligence tools across our regular supplier and contractor base. This includes rolling out the enhanced *Supplier Questionnaire* and adopting the revised version of the *Contractor Code of Practice*. These measures form part of our broader efforts to strengthen onboarding, reinforce ethical standards, and maintain ongoing visibility of compliance across all third parties engaged in the delivery of goods, works, or services to Park Holidays UK.

Governance and Monitoring 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 Department play a key role in managing modern slavery risk within their areas of responsibility, including identifying and mitigating supplier-related risks through due diligence and embedding responsible business practices into sourcing and operational activities.

Our in-house Legal & Compliance Team remains available to provide advice and guidance to ensure continued compliance with legal obligations. Oversight is further supported by our Internal Audit Team, and the business is also subject to regular external audits, with increased focus following our integration into the Sun Communities, Inc. group.

To support the delivery of our modern slavery commitments, we established a cross-functional Working Group in 2025. This group contributes to the preparation of this statement, reviews relevant policies and documentation, and helps coordinate actions across departments. As our approach develops, we are exploring practical ways to monitor effectiveness — such as tracking supplier engagement, training participation, and the completion of due diligence requirements — to inform continuous improvement.

Priorities for the Remainder of 2025

Our key focus areas for the remainder of 2025 include:

- **Embedding updated supplier and contractor due diligence documentation** — including the 2025 revisions of Supplier Questionnaire and Contractor Code of Practice — into the new supplier onboarding process and rolling it out to our existing supplier and contractor base as part of their annual review and re-enrolment. This ensures consistent application of our compliance standards and ethical expectations across all third parties.
- **Strengthening supplier and contractor oversight** by improving how we collect, track, and review information related to ethical business conduct and modern slavery compliance — ensuring consistent due diligence across all new and existing third parties.
- **Rolling out modern slavery awareness training** beginning with a mandatory module for all management and high-risk teams — including HR, Finance and Property — to build targeted awareness and support responsible decision-making in roles with elevated exposure to modern slavery risks.

- **Embedding modern slavery safeguards into recruitment and onboarding processes** by leveraging our newly launched digital recruitment platform and preparing for the implementation of a complementary onboarding module later in 2025. These systems are designed to support consistent employment checks, documentation control, and alignment with both ethical and legal requirements.
- **Exploring practical ways to monitor progress and improve visibility of our efforts**, using simple indicators such as training participation rates and supplier engagement with due diligence requirements.

This statement has been approved by the Board of Directors on 26 June 2025 and will be reviewed annually.

Richard Ullman

Chief Operating Officer, Park Holidays UK Limited
June 2025