

PARK HOLIDAYS UK LIMITED

MODERN SLAVERY STATEMENT 2026

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, forced labour, servitude, or unlawful child labour in any form.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken during 2025 and early 2026 to identify, manage and reduce modern slavery risks within our business and supply chains.

We recognise that preventing modern slavery requires ongoing focus, practical controls and continuous improvement. During the reporting period, we have continued to strengthen our approach by improving supplier and contractor due diligence, enhancing recruitment and onboarding processes, and increasing awareness of modern slavery risks among our team members. This statement also summarises our priorities for the remainder of 2026 as we continue to embed these improvements.

Our Business and 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, maintenance, and site services across our parks.

As a large seasonal employer, we operate with approximately 1,100 permanent team members 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 operating model, including seasonal recruitment, subcontracted work, and outsourced services, can carry elevated modern slavery risks, and we are committed to managing these risks with appropriate oversight, due diligence, clear employment standards, and ongoing review.

Actions Taken in 2025 and early 2026

During 2025 and early 2026, 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 2025, we completed a detailed review of our supplier and contractor due diligence documentation. As part of this work, we developed an enhanced Supplier and Contractor Questionnaire and a revised Contractor Code of Practice to strengthen the requirements relating to ethical business conduct, human rights, modern slavery compliance, labour practices, subcontractor controls, and supply chain transparency. During 2026, these updated documents began to be implemented as part of the onboarding process for new suppliers and contractors. This has strengthened how we collect and review information at the point of engagement and helps ensure that modern slavery and ethical labour considerations are built into our supplier and contractor approval processes. We will continue to extend the use of the revised documentation to existing suppliers and contractors as part of annual review or renewal activity during the remainder of 2026.
- **Employment Practices:** We continue to apply established recruitment and onboarding procedures designed to ensure legal compliance, ethical standards, and fair treatment of all candidates and team members. These include right-to-work verification, employment contract validation, payroll verification, and clear communication of key employment terms including pay, working hours, holiday entitlement, grievance procedures, and whistleblowing channels, supported by clear records and documentation. In 2025, we implemented a new digital recruitment platform to improve the efficiency, transparency, and consistency of our hiring processes. In 2026, we further strengthened this by launching a new onboarding module.

Together, these platforms have improved the candidate and new joiner experience, made onboarding more straightforward and accessible, and supported more consistent management of employment checks, documentation, and communications. They also help ensure that recruitment and onboarding activity aligns with both regulatory obligations and Park Holidays' internal standards.

- **Training:** In 2026, we are in the process of rolling out mandatory modern slavery awareness training to all senior managers and leaders, supported by communication to reinforce the purpose of the training, the importance of speaking up culture, appropriate escalation routes, and timely completion. This marked an important step in increasing awareness of modern slavery risks across the business.
- **Handbook, policies and internal communication:** In 2025, we launched a new *Team Member Handbook*, supported by refreshed key HR policies and guidance covering equal opportunities, whistleblowing, harassment and bullying, sexual harassment, and ethical and responsible employment practices. These updates reinforce Park Holidays' commitment to providing a fair, respectful, and responsible working environment. In 2026, we also launched a new internal *intranet portal* to improve transparency, communication, and ease of access to key information. This includes access to policies, the *Team Member Handbook*, employee resources, benefits information, and internal updates. The portal supports a more consistent and accessible employee experience and helps employees and managers locate relevant guidance more easily.

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, procedures and controls designed to promote ethical conduct, safeguard employee rights, and ensure compliance with applicable employment laws and standards. These policies also support our wider governance objectives and reinforce our zero-tolerance approach to exploitation.

Our *Team Member Handbook* sets out key standards, expectations, and routes for raising concerns — 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. 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, and clear communication of key employment terms — are applied consistently across the business. All team members, including temporary and seasonal staff, benefit from the same core safeguards and receive clear, fair terms of employment.

To further support compliance and enhance the candidate experience, we introduced a new digital recruitment platform in 2025 and launched a complementary onboarding module in 2026. Together, these systems have streamlined our recruitment and onboarding workflows, improved transparency, and supported more consistent management of employment checks, documentation and record keeping. They also help ensure that our recruitment and onboarding activity aligns with both regulatory obligations and Park Holidays' internal standards.

Recruitment and onboarding policies have been drafted and are being reviewed to ensure they align with these systems and reflect current legal requirements 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.

Park Holidays holds the Investors in People Gold Award. As part of this accreditation, anonymous staff surveys are conducted during assessment periods to gather insights into employee engagement, workplace culture, and areas for improvement. These surveys help ensure that the voice of our team members is heard and reflected in our ongoing policy and culture development.

We also support employee engagement through internal feedback channels, including a Head Office employee group which provides an opportunity for colleagues to share views, raise ideas, and contribute to improvements in the working environment. This supports our broader culture of openness, engagement, and continuous improvement.

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

Training and Awareness

During 2025, we continued to strengthen the foundations of our approach to modern slavery risk and increase modern slavery awareness through engagement with internal stakeholders. In the current year, we began to formalise this awareness activity through the rollout of a mandatory modern slavery awareness module, initially focused on senior management and roles with greater exposure to modern slavery risk. This is intended to strengthen baseline awareness of modern slavery risks, key indicators, and appropriate reporting channels.

The training is delivered through a mandatory module and forms part of our wider compliance and learning framework. It is designed to build understanding of the nature and potential impact of modern slavery within both our business and supply chains, and to help individuals recognise and raise concerns where necessary. In addition to this general awareness training, we continue to develop more targeted content for key roles with greater exposure to modern slavery risk, where specific knowledge is essential.

We are also working to further embed modern slavery awareness into our people processes, including onboarding and ongoing mandatory training cycles, and will continue to evolve the programme to ensure it remains relevant, proportionate, and effective as our approach matures.

Beyond modern slavery-specific content, team members have access to a suite of training modules — including mandatory compliance courses that support 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 important 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 team.

When we acquire a new business with existing employees, our mergers and acquisitions integration process includes right-to-work verification and supports 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, or involves agency labour. In response, we continue to strengthen our due diligence processes and improve supply chain transparency.

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. The scheme includes the administration of a *Pre-Qualifying Questionnaire (PQQ)*, which helps ensure that health and safety standards, codes of conduct, insurances, and method statements are applied in line with Park Holidays' expectations. Once approved through the 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 2025 and early 2026, we undertook a comprehensive review of our supplier and contractor due diligence practices and implemented targeted improvements to strengthen the documentation required and collected by Park Holidays to support our modern slavery compliance obligations. This included enhancing the *Supplier and Contractor Questionnaire* and adopting a revised *Contractor Code of Practice*. These updates focus on embedding ethical labour standards, improving transparency, and formalising the collection of modern slavery and risk-related disclosures across our supply chain. The updated documentation includes clearer expectations around ethical business conduct, modern slavery compliance, labour practices, supply chain transparency, and evidence requirements. This work has been supported by input from key representatives from across the business to ensure the revised documentation is practical, proportionate, and aligned with our broader governance framework.

During 2026, the updated due diligence documentation has begun to be used as part of our new suppliers and contractor onboarding. Throughout the remainder of 2026, our focus will be to extend the use of these documents to existing suppliers and contractors as part of annual review and renewal activity. 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 meets and reviews the Company's 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 and Compliance Team provides advice and guidance to support continued compliance with legal obligations. Oversight is further supported through internal audit activity, policy review, operational reporting, and relevant external audit or assurance processes.

Key internal stakeholders from across the business contribute to the preparation of this statement, review of relevant policies and supporting documentation, and helps coordinate actions relating to modern slavery risk. This helps ensure that our approach remains practical, proportionate, and aligned with the way the business operates.

During 2025 and early 2026, our monitoring activity focused on key areas of progress, including updated supplier and contractor due diligence documentation, mandatory modern slavery training, and continued embedding of recruitment and onboarding controls.

As our approach develops, we will continue to monitor effectiveness through practical indicators such as training completion, supplier and contractor engagement with updated due diligence documentation, progress against annual review or renewal activity, and any concerns or escalations raised through internal reporting routes. We will also keep our governance and oversight arrangements under review to ensure modern slavery risks continue to be identified, assessed, and managed appropriately.

Priorities for the Remainder of 2026

For the remainder of this year, our focus will be on embedding the improvements made during 2025 and early 2026, while continuing to strengthen the practical controls that support our modern slavery prevention efforts.

We will focus on:

- **Continuing to embed the updated supplier and contractor due diligence documentation** — including the revised Supplier Questionnaire and Contractor Code of Practice — consistently as part of new supplier and contractor onboarding, and extending its use to existing supplier and contractor base as part of their annual review and renewal activity. This will support more consistent application of our compliance standards and ethical expectations across relevant third parties.
- **Continuing to strengthen supplier and contractor oversight** by improving how we collect, track, and review information related to ethical business conduct, modern slavery compliance, and supply chain transparency to support more consistent due diligence across new and existing third parties.
- **Finalise roll out and monitor completion of mandatory modern slavery awareness training** and consider whether any additional or more advanced training should be introduced for managers and other relevant roles involved in recruitment, supplier and contractor engagement, agency labour, or work delivered through third parties, to support responsible decision-making in roles with elevated exposure to modern slavery risks.
- **Reviewing recruitment and onboarding controls following implementation** to ensure employment checks, documentation, communication of key employment terms, and supporting policies remain consistent, clear and effective.
- **Improving visibility of progress and effectiveness of our efforts** by using practical indicators such as supplier and contractor engagement with updated due diligence requirements, progress against annual review or renewal activity, and any concerns or escalations raised through internal reporting routes.

This statement has been approved by the Board of Directors on 30 June 2026 and will be reviewed annually.

Richard Ullman

Chief Operating Officer, Park Holidays UK Limited
June 2026