CENTER PARCS

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR THE FINANCIAL YEAR ENDED 20 APRIL 2017

This statement is made by Center Parcs (Holdings 1) Limited, company registration number 07656429 (we, us, our or the Company) pursuant to section 54, Part 5 of the Modern Slavery Act 2015 (Act). It constitutes our modern slavery and human trafficking statement for the financial year ended 20 April 2017. This statement sets out the steps we have taken since April 2016 to prevent modern slavery and human trafficking in our business and supply chains.

The Company is the UK parent company for the Center Parcs operating businesses. The group has approximately 8,200 employees.

OUR BUSINESS AND SUPPLY CHAIN

Center Parcs is a leading UK short-break holiday business. We operate five specially constructed holiday villages in the United Kingdom.

In July 2016, we received planning permission to build a sixth village in County Longford, Republic of Ireland. This will be our first village outside of the United Kingdom. Construction, of what is expected to be a two year development programme, has commenced at the site with a planned opening of summer 2019.

Our supply chains include the procurement of goods and services necessary for the operation of holiday villages and for the re-sale of goods and services, along with the construction of the sixth site in the Republic of Ireland.

OUR MODERN SLAVERY FRAMEWORK

We remain committed to eradicating modern slavery and human trafficking in any part of our business and supply chain.

Our Code of Business Conduct and Ethics (the Code) continues to reflect our commitment to acting ethically and with integrity in all our business relationships. All relevant employees undertake annual training and certify compliance with the Code. Our Ethical Trading Policy is part of our commitment to implementing and enforcing effective systems and controls that aim to ensure slavery and human trafficking is not taking place anywhere in our supply chain. We try to ensure that we work with UK and international suppliers who treat their obligations towards modern slavery and human trafficking with the same importance that we do.

Our employees are encouraged to speak up and report any potential wrongdoing through our independent whistleblowing hotline.

Over the past year we have:

• increased our focus on modern slavery within our wider procurement operations;
• reviewed and updated our original desk based assessments of risk for high spend suppliers, and considered lower spend suppliers in high risk locations and/or products or services;
• considered modern slavery in the construction of the sixth village in the Republic of Ireland;
• incorporated measures into our supplier selection processes and online procurement system;
• reviewed our supplier management processes to ensure that our suppliers understand our expectations in relation to modern slavery;
• ensured that all new key suppliers are required to complete a modern slavery questionnaire and to sign our Ethical Trading Policy. The Ethical Trading Policy requires our suppliers to ensure that modern slavery and human trafficking does not occur within their supply chain;
• monitored potential risk areas in our supply chain by collating and assessing the modern slavery questionnaires and taking remedial action where necessary and including modern slavery and human trafficking questions within all relationship review meetings; and
• rolled out modern slavery training to our procurement teams to raise awareness, provide insight into potentially high risk products/services and agreed plans to enable category managers to review modern slavery risks.

We are continuing to review our general terms and conditions and key contracts to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

We understand that we have a responsibility to continue to assess and mitigate the risk of modern slavery in the long term. During the year, we have continued to increase our understanding of the nature of that risk and established policies and begun to implement policies to manage the risk.

In order to understand how effective our efforts are to ensure modern slavery does not exist within any of our business activities we aim to:

• conclude the review of our general terms and conditions and key contracts in relation to the Act;
• include modern slavery questions in our annual review processes with all key suppliers throughout the business and specifically the key food and beverage suppliers;
• incorporate modern slavery provisions in our operating agreement with preferred suppliers;
• extend the modern slavery training to all procurement teams throughout the business;
• develop key performance indicators to include employee training levels and supplier activities;
• investigate modern slavery risks as they arise and put in place corrective actions; and
• monitor government and industry guidance on modern slavery and consider their applicability to Center Parcs.

Based on the above, we consider that our policies and procedures are transitioning towards a reasonable level of assurance of effectiveness in eradicating modern slavery and human trafficking in our business and supply chain.

This statement was approved by the Center Parcs (Holdings 1) Limited Board of Directors on 31 October 2017

Signed
M P Dalby
Chief Executive Officer