

## **CENTER PARCS**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

#### **FOR THE FINANCIAL YEAR ENDED 26 APRIL 2018**

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 26 April 2018. This statement sets out the steps we have taken since April 2017 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 8,500 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.

Construction work has continued on the sixth village in County Longford, Republic of Ireland with a planned opening scheduled for 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 ensuring that modern slavery and human trafficking has no part in any 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 have access to a confidential independent whistleblowing hotline to raise any concerns they may have about employment conditions. The hotline is open to both permanent and temporary employees and gives employees the opportunity to report any concerns they may have about issues related to modern slavery or wider welfare issues. Calls to the confidential hotline are monitored and escalated as appropriate if further action is required. We have not received any calls related to modern slavery issues.

Over the past year we have completed the following initiatives:

- amended our general procurement terms and conditions and key contracts to include a modern slavery clause;
- introduced modern slavery questions in our annual review processes with all key suppliers throughout the business and specifically the key food and beverage suppliers;
- incorporated modern slavery provisions in our operating agreement with preferred suppliers; and
- extended the modern slavery training to all employees engaged in procurement activity.

Additionally, we have continued to:

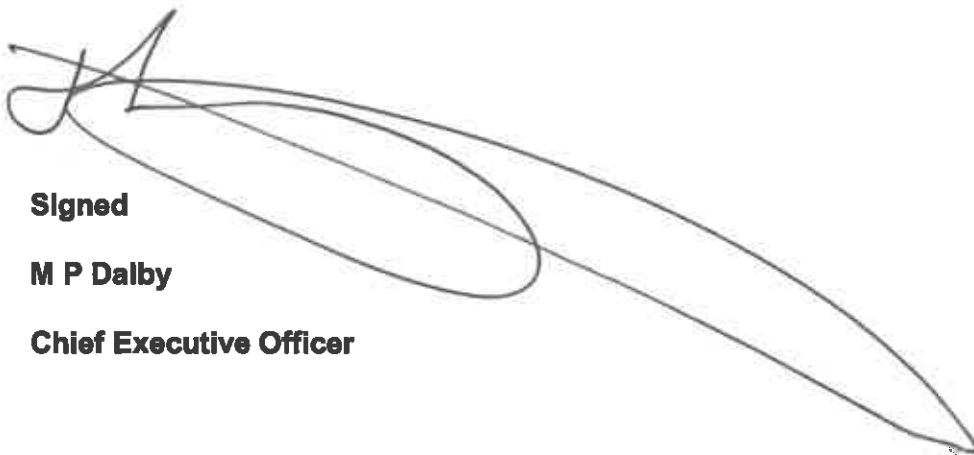
- review and update our original desk-based assessments of risk for high spend suppliers and lower spend suppliers in high risk locations and/or products or services;
- consider modern slavery in the construction of the sixth village in the Republic of Ireland;
- review our supplier management processes to ensure that our suppliers understand our expectations in relation to modern slavery;
- ensure 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;
- monitor 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;
- refresh our modern slavery training to our procurement teams to raise awareness and provide insight into potentially high-risk products/services;
- 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.

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 the coming year we will develop key performance indicators to understand how effective our actions have been in ensuring that modern slavery does not exist within our business activities. We will also work with our HR teams to develop their understanding of the modern slavery risks within their areas.

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 15<sup>th</sup> October 2018**

A large, stylized handwritten signature in black ink, appearing to be 'M P Dalby', written over a large, faint oval shape.

**Signed**

**M P Dalby**

**Chief Executive Officer**