

**HAULFRYN GROUP LIMITED**

**MODERN SLAVERY STATEMENT**

**FOR FINANCIAL YEAR ENDED 31<sup>ST</sup> JANUARY 2021**

This statement sets out the steps taken by Haulfryn Group Limited (Haulfryn), company registration number 00307876, and its Group companies pursuant to **Section 54 of the Modern Slavery Act 2015 (Act)**.

**The Modern Slavery Act 2015**

The Act requires that any commercial organisation in any sector which supplies goods or services, and carries on a business or part of a business in the UK, and is above a specified total turnover, must produce a modern slavery and human trafficking statement each financial year which confirms its compliance with the Act, and publish this statement on an appropriate transparency website. Haulfryn are registered under the Home Office's Modern Slavery database.

The statement must set out what steps the business has taken during the financial year to ensure that modern slavery is not occurring in their supply chain, or in its own organisational structure.

**About Haulfryn**

Haulfryn Group Limited is a privately-owned business with over 85 years trading history in the UK. It employs circa 250 full time employees with a seasonal workforce of circa 600 employees, all based in the UK. Haulfryn operate 25 parks in the UK, 13 holiday parks and 12 residential parks. Of these, 22 are owned, with 3 parks operated on a management and development contract basis. The residential division provides permanent homes for individual owners, many of whom are over 55 years old. The holiday division provides holiday homes to owners on parks and, in turn, sublets a number of those properties to holidaymakers, in addition to running a fleet of units for direct hire. The larger parks offer a range of additional facilities such as pools, gyms, restaurants, bars, spas, and retail shops.

**Our Commitment**

We recognise our responsibility in ensuring sound social and environmental practices in our operations and in our supply chain and have embarked on the development of a comprehensive Corporate and Social Responsibility (CSR) strategy for the Group. We are committed to playing our part in eradicating modern slavery and human trafficking in all parts of our business and supply chain.

**Our People**

Haulfryn operate solely in the UK and abide by all UK employment laws including any country-based derivatives. As such, we believe that we are at low risk of modern slavery in our employee base. Our internal employee standards and policies are consistent with the requirements of applicable legislation.

Our ethics code is set out in several specific policies including anti-bribery and fraud as well as whistleblowing. These outline the standards and behaviours which we expect from all our

employees, contractors and business partners. Our employees are encouraged to identify and report any potential breaches of our policies through existing internal procedures. We have online diversity and inclusion, and ethics training in place in the business, in addition to having adopted a specific training module regarding the Modern Slavery Act in 2019/20. All employees with email access are required to complete this training. Furthermore, this policy, and the implications therein, have been reviewed with senior management and heads of departments to ensure the principles are understood and cascaded through the business, ensuring that awareness is maintained.

### **Our Suppliers**

Due to the nature of our business, we engage with a relatively large number of suppliers, directly and through our supply chain at an international, national, and local, level. However, most of our expenditure is with a relatively small number of national suppliers.

We want to work with the right suppliers who meet our quality standards and share our values and take their obligations towards modern slavery and human trafficking seriously.

We write to the top 100 suppliers (by value) to our business each year and ask them to confirm their approach to the requirements of the Modern Slavery Act, and share with us their statement on the subject so we can ensure that this confirms their compliance with the Act. Those suppliers without statements in place are asked to do so in order to comply with our terms, and all new suppliers also must comply with this requirement.

We have reviewed our supply chain with the aim of identifying any areas which we believe may be of risk. During our procurement contract reviews we ensure that all contracts contain appropriate clauses in relation to the prevention of modern slavery and human trafficking and specifically address this issue during tender processes.

Based on the information above, we consider that our policies and procedures minimise the risk of modern slavery and human trafficking in our business and our supply chain, but we also recognise that this is an iterative process and measures will continue to be reviewed and developed as required.

This statement was approved by the Haulfryn Group Limited Board of Directors on 27th January 2021 and will be reviewed on an annual basis at our January Board meetings prior to the end of the financial year.



**Echo Lu**  
CEO, Haulfryn Group Limited



**Matt Britton**  
CFO, Haulfryn Group Limited