# Modern Slavery Statement

For Financial Year ended 28 February 2023

#### 1. Introduction

This statement sets out the steps taken by Verdant Leisure Group Limited (Verdant Leisure), Company Registration Number 09966385, and its Group companies pursuant to Section 54 of the Modern Slavery Act 2015 "the Act".

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 company website.

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.

#### 2. About Us

The Verdant Leisure Group of Companies own and operate holiday caravan and lodge parks across Scotland and England. Formed in 2010 with two parks in Southeast Scotland, the Group now has twelve parks and a head office.

We employ around 250 permanent staff with around 200 temporary staff joining us for the peak season. Our business continues to grow with new park acquisitions and all new parks and employees are required to comply with our policies and procedures. Following the recent acquisition of Golden Coast Leisure Park our temporary staff will increase to around 250 during peak season.

Our supply chain includes the procurement of goods and services necessary to offer holiday home ownership and short breaks in self-catering accommodation. We operate a number of facilities that differ between parks including on site shops, bars, restaurants and pools.

We are committed to playing our role in eradicating modern slavery in all its forms from our business and supply chain. We are taking appropriate steps to ensure that our employees, customers and other stakeholders benefit from an environment in which fundamental human rights are respected.

## 3. Our Policies and Practices in Relation to Modern Slavery

The following company policies support us in ensuring that modern slavery does not take place in our business or in our supply chains. They are available to all employees via our HR platform.

#### 3.1 Code of Conduct

Our Code of Conduct describes the fundamental behaviours and standards that the company expects from all its employees in order for the company to show honesty, integrity and trust to all its stakeholders. It details how we will achieve our mission through personal, social, legal and ethical responsibility, in line with our values.

## 3.2 Responsible and Ethical Procurement and Supply Chain

Due to the nature of our operations, we engage with a large number of suppliers both nationally and locally. We want to work with the right suppliers who not only meet our quality standards, but also align with our company culture, values and ethics. We believe there is a very low risk of slavery and human trafficking occurring in our business and supply chains.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

We will write to the top 20 suppliers (by value) to our business each February and ask them to confirm their approach to the Modern Slavery Act and share with us their statement. Those suppliers without statements in place are encouraged to do so where appropriate.

### 3.3 Our People Policies

Verdant Leisure operate only in the UK and abide by all employment laws including any devolved nation specifics. As such, we believe that we are at low risk of modern slavery occurring within our own employees. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We have specific policies in place that outline the standards and behaviours that we expect from employees, contractors and other stakeholders. This includes Anti-Money Laundering, Conflict of Interest, Bullying & Harassment and Whistleblowing.

We want all our staff to feel confident that they can expose any wrongdoing without any risk to themselves. Through our whistleblowing policy employees are encouraged to report any serious concerns, whether within the company or our supply chains, without fear of reprisal.

Our Equality of Opportunity Policy and Bullying and Harassment Policy ensure we foster a fair and inclusive workplace where our people are valued, their difference respected and discrimination is eliminated.

From a HR perspective, we implement 'right-to-work' checks on all new employees and undertake regular checks on shift-patterns and the hours worked by our colleagues. We also understand the importance of focusing on having a culture of engaging in all activities with respect and fair treatment of others.

We provide awareness training to staff on the Modern Slavery Act 2015, which includes the appropriate action to take if they suspect a case of slavery or human trafficking.

Based on the above information 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 ongoing process and measures will continue to be reviewed and developed as required.

This statement has been approved by the Board of Directors on 29 November 2022 and will be reviewed on an annual basis at our February Board meeting prior to the end of the financial year.