



Haulfryn
The hallmark of quality

HAULFRYN GROUP LIMITED

MODERN SLAVERY STATEMENT

FOR FINANCIAL YEAR ENDED 31ST JANUARY 2020

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 slavery and human trafficking statement for each financial year of the organisation, and publish this statement on an appropriate transparency website. Haulfryn are registered under the Home Office's Modern Slavery contact 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 and in its own organisational structure and specifically requires an organisation to be transparent about what is happening within its business.

About Haulfryn

Haulfryn Group Limited is a privately-owned business with over 80 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 28 parks in the UK, 13 holiday parks and 15 residential parks. Of these, 24 are owned with 3 parks operated on a management and development contract basis in the residential division and one in the holiday market. The residential division provides permanent homes for individual owners, the majority 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 units to holidaymakers, in addition to running a fleet of units for hire directly.

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 alongside our employee handbook, 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 diversity and inclusion, and ethics training in place in the business including for all new starters in addition to having adopted a specific on-line training module regarding the Modern Slavery Act during the year. All employees with email have access to this training and we actively monitor our completion rate. Furthermore, this policy and the implications therein have been reviewed with management and heads of departments to ensure the principles are understood and cascaded through the business to ensure awareness is maintained.

Our Suppliers

Due to the nature of our business, we engage with a relatively large number of suppliers at both a national, and local level. However, much 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.

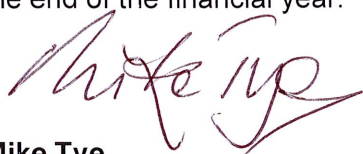
We wrote a year ago to the top 100 suppliers (by value) to our business and asked them to confirm their approach to modern slavery and share with us their statement on the subject. We have written to the current top 100 suppliers either seek confirmation that their supplied Modern Slavery Statement is still in place and has been updated as appropriate or, to seek a copy if they are a new supplier to the list or to request a statement again where one has not been forthcoming. Those suppliers without statements in place will have to supply one to comply with any future tender process.

We have reviewed our supply chain with the aim of identifying any areas which we believe may be of risk. We have reviewed our conclusions and will continue to do so on an annual basis.

During our procurement contract reviews we are ensuring that all contracts contain appropriate clauses in relation to the prevention of modern slavery and human trafficking and have amended our procurement policy to specifically address this issue during tender processes. This has been strictly enforced throughout the year.

Based on the information above, we consider that our policies and procedures give an appropriate level of reassurance of minimising 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 22nd January 2020 and will be reviewed on an annual basis at our January Board meetings prior to the end of the financial year.



Mike Tye
Chairman, Haulfryn Group Limited

10-02-20



Matt Britton
CFO, Haulfryn Group Limited

10-02-20