



Haulfryn
The hallmark of quality

HAULFRYN GROUP LIMITED

MODERN SLAVERY STATEMENT

FOR FINANCIAL YEAR ENDED 31ST JANUARY 2019

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.

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 29 parks in the UK, 13 holiday parks and 16 residential parks. Of these, 24 are owned with 4 parks operated on a management 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 several 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 believe that we have policies in place which go to safeguard the business from the risks of modern slavery and raise employee's awareness of the same.

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 and will be introducing an online training module specifically to address the Modern Slavery Act this year.

Furthermore, this statement 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.

We are continuing to review and update our suite of policies in respect of the Modern Slavery Act and update this statement with applicable changes on an annual basis.

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 have written to the top 75 suppliers (by value) to our business which represent 80% of our total expenditure, and any supplier who supplies people-related services specifically and asked them to confirm their approach to modern slavery and share with us their statement on the subject. We will review responses and work with suppliers to remedy any issues, ultimately removing these suppliers from our supply chain if we cannot get comfort from their response.

We have reviewed our supply chain with the aim of identifying any areas which we believe may be of risk. We will review our conclusions on an annual basis and will review the statements from our supplier base annually too.

Additionally, 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 applies to all suppliers, regardless of turnover level.

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 27th March 2019 and will be reviewed on an annual basis at our March Board meetings.



Bobby McGhee
CEO, Haulfryn Group Limited

Dated: 27-03-19



Matt Britton
CFO, Haulfryn Group Limited

Dated: 27-03-19