



## **HAULFRYN GROUP LIMITED and HAULFRYN LIMITED**

### **MODERN SLAVERY STATEMENT**

#### **FOR FINANCIAL YEAR ENDING 31st JANUARY 2025**

This statement is made by the Board of Directors of Haulfryn Group Limited, company registration number 00307876, and Haulfryn Limited company registration number 10780135 pursuant to Section 54 of the Modern Slavery Act 2015 (Act). It covers the activities and actions of the Group during the financial year ending 31st January 2025, to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

#### **About Haulfryn Group Limited and Haulfryn Limited**

We are a privately owned business with over 90 years trading history in the UK and employ circa 250 full-time employees with a seasonal workforce of circa 600 employees, all based in the UK.

During the year, Haulfryn Group Limited and Haulfryn Limited operated 18 parks in the UK, 10 holiday parks and 8 residential parks. Of these, 17 are owned, with 1 park 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 supply chain includes the procurement of goods and services necessary for the operation of the holiday and residential parks and is made up of, goods for re-sale, food and beverage, leisure, business and consultancy services, consumables and disposables, and construction and property. Our supply chain also consists of recruitment agencies, other service professionals, general office suppliers, insurers, banks and utilities provider.

#### **Our Commitment**

We are committed to ensuring that modern slavery and human trafficking is eradicated in all parts of our business and supply chain; and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place.

#### **Policies in Relation to Slavery and Human Trafficking**

Haulfryn Group Limited and Haulfryn Limited 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 and the introduction of a new anonymous Whistleblowing reporting tool.

### **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 review process, we review all written contracts for appropriate clauses in relation to the prevention of modern slavery and human trafficking and specifically address this issue during tender processes.

### **Due Diligence Process**

We acknowledge that there is a risk of exposure to modern slavery in our supply chain.

As part of our initiative to identify and mitigate risk, we have processes and training in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

We also ensure that all our employees are paid at least the Real Living Wage.

### **Risk Assessment and Management**

As part of managing the risk of modern slavery, we expect all our employees, suppliers, and customers to raise any concerns or suspicions that they have about modern slavery. Concerns can be reported confidentially by making a Whistleblowing report or by contacting the Human Resources Department and will be investigated by the appropriate personnel.



### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training to all our employees in the form of an internal online training module. We also have diversity and inclusion, and ethics online training in place.

### **Effectiveness and Performance**

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.

### **During the Year We:**

- Assigned all employees on Modern Slavery as part of the onboarding process.
- Conducted a review of the supplier onboarding process related to IR35
- Updated all of our related policies and Code of Conduct.

### **Next Steps:**

Our focus this year will be to:

- Conduct a review of the supplier onboarding process.
- Carry out refresher training for all employees.
- Simplify access to our anonymous Whistleblowing reporting tool.

### **Board of Directors Approval**

This statement has been approved by the Board of Directors of Haulfryn Group Limited and Haulfryn Limited on 26<sup>th</sup> June 2025 and signed by the Chief Executive Officer and Chief Financial Officer of Haulfryn Group Limited and Haulfryn Limited.

**Robert McGhee**  
**Chief Executive Officer**

**DATE:** 26.06.2025

**Patrick Howard**  
**Chief Financial Officer**

**DATE:** 26.06.2025