

# MODERN SLAVERY ACT 2015

## STATEMENT

### Britannia Jinky Jersey Limited t/a Pontins

Pontins operates holiday parks with sites based throughout the UK. This is the Modern Slavery Transparency Statement of Pontins for the Financial year ending 31 March 2025. This statement is made pursuant to S54 (1) of the Modern Slavery Act 2015.

It is acknowledged that particular areas of risk may be present in the provision of supply chains behind the supply of furniture and food supply chains and in respect of the potential use of holiday parks for activities by individuals that breach modern slavery laws. Likewise park employees include permanent, seasonal and casual workers from wide ranging nationalities. Whilst strict procedures are in place for employees other areas of risk is involve agency workers recruited through external agencies.

#### **Employed Staff**

All UK staff are vetted for their right to work in the UK – until such proof is provided staff cannot be entered onto the payroll. All UK staff are paid at least the minimum wage and we work and strive towards a living wage for all.

Pontins have a whistleblowing policy within their staff handbook and all staff are aware of a reporting procedure for any matter of concern including issues relating to modern slavery. Further progress has been made on whistleblowing policy with an online reporting facility and updated training. Pontins have many nationalities working together and it is a trademark of the business with a great emphasis on equal opportunities for all strict codes of conduct relating to bullying and harassment are paramount with full policies and training provided to staff.

#### **Agency Staff**

Use of any agency staff is extremely limited with most staff being employed directly. Where an agency is utilised, all contracts issued by them will have to contain a pre-contractual clause declaring compliance with the Modern Slavery Act 2015.

#### **Child Sexual Exploitation (“CSE”) awareness**

CSE training is included in staff inductions for front desk staff. This is a process of identifying vulnerable or underage individuals that may be being exploited by other guests in a hotel. This is attempting to tackle the problem of the use of holiday parks for activities contrary to the Modern Slavery Act. CSE is constantly evolving and Pontins work together with external authorities such as the police initiatives to address the potential problems and to ensure knowledge and awareness are maintained in line with developments.

#### **Supply chains and workers’ rights**

UK based Suppliers used by sites have to be from a pre confirmed list of trusted local suppliers or suppliers form a group wide contract.

The overwhelming majority of product and services are commissioned/ordered through Purchase Orders. The terms upon which Pontins expect the supplier/provider to conduct their operation are defined in the Terms and Conditions issued pre-contract to all suppliers/providers. The Purchase

Order forms' terms and conditions have been updated requiring that suppliers confirm compliance with the Modern Slavery Act.

Likewise, all new group supply agreements will require a clause requiring compliance with the Modern Slavery Act incorporated into them.

Where there are long standing suppliers in the limited areas which are not ordered/commissioned through Purchase Orders there will be a process applied of an agreed variation amendment to include such a clause and in any other case the supplier/provider will be required to agree, in writing, that they will at all times comply with the Modern Slavery Act. This will apply to both UK and non-UK suppliers/providers.

**Company Policies /Procedures**

Awareness is the key so training programmes are available and are being developed so all workers are aware of the Modern Slavery Act and its implications to the hotel industry. Such processes are under constant review.

Signed by

A handwritten signature in black ink that reads "Robert Ferrari". The signature is written in a cursive, flowing style.

Robert Ferrari

*Director on behalf of the Pontins Group and Board Compliance Officer for the annual modern slavery and human trafficking statement*