



Away Resorts Limited

Modern Slavery and Human Trafficking Statement

For the financial year ended 31 December 2025

1. Introduction and scope

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the Act). It sets out the steps taken by Away Resorts Limited (company number 06458827) and its group companies (together, Away Resorts, we, us and our) during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking in our business and supply chains.

For the purposes of this statement, modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. Away Resorts recognises that modern slavery is a serious abuse of human rights and that responsible businesses have an important role to play in identifying, preventing and addressing the risk of exploitation.

This statement has been prepared by reference to the areas of disclosure described in section 54(5) of the Act: our organisational structure and supply chains, relevant policies, risk assessment, due diligence, training, and how we monitor the effectiveness of our approach.

2. Our business, structure and supply chains

Away Resorts was established in December 2007. Our Head Office (Central Support) is located at The Maylands Building, 200 Maylands Avenue, Hemel Hempstead, Hertfordshire HP2 7TG. During the above financial year, we operated a portfolio of 27 holiday parks and resorts across the United Kingdom, offering holiday accommodation, holiday home ownership, leisure, hospitality, entertainment, food and beverage, retail and related guest services.

We employ approximately 2533, colleagues, all working within the UK, across Central Support and park operations. Our workforce includes permanent, fixed-term, seasonal and flexible roles, reflecting the seasonal nature of the hospitality and holiday park sector.

During the reporting period, no material acquisitions were completed. We continued to embed group standards across our operations, including in relation to procurement governance, supplier onboarding, people policies and compliance controls.

Our supply chain supports the operation, maintenance and development of our parks and resorts. It includes suppliers of food and beverage, cleaning and laundry services, facilities management, repairs and maintenance, construction and refurbishment services, utilities, IT, professional services, transport and logistics, waste management, uniforms, branded merchandise, retail goods, furniture, fixtures and equipment. Most of our direct suppliers are UK-based, but we recognise that some products and materials may have longer or more complex manufacturing and distribution chains outside the UK.

3. Our commitment

Away Resorts has a zero-tolerance approach to modern slavery, forced labour, servitude and human trafficking. We are committed to acting ethically, transparently and with integrity in our business dealings and relationships, and to maintaining systems and controls designed to reduce the risk of modern slavery in our own operations and supply chains.



We expect everyone working for, or on behalf of, Away Resorts to respect human rights and to act consistently with our standards. We will not knowingly engage with any supplier or business partner that is involved in modern slavery or that fails to take reasonable steps to address modern slavery risks once identified.

4. Governance and responsibility

The Board of Directors has overall responsibility for this statement and for overseeing Away Resorts' approach to preventing modern slavery. The statement is reviewed annually and approved by the Board before publication.

Day-to-day responsibility for implementing our approach sits with senior management, supported by the Legal, People and Operations teams. The Legal function coordinates the annual statement and provides legal oversight. The People team is responsible for recruitment, employment policies and employee relations processes. Operations teams are responsible for applying these controls at park level and escalating concerns.

Any material concern relating to modern slavery is escalated to senior management and the Legal function, with further escalation to the Board where appropriate.

5. Policies and standards

Our approach is supported by policies and procedures that apply across the business. These include our Employee Handbook, recruitment and right-to-work procedures, Equality, Diversity and Inclusion Policy, dignity at work and anti-harassment standards, grievance and disciplinary procedures, Whistleblowing Policy, health and safety procedures, procurement processes and supplier contracting controls.

Our employment standards require fair treatment, non-discrimination, lawful pay and working time practices, safe working conditions, voluntary employment and respect for workers' rights. We do not charge workers recruitment fees and we verify each employee's legal right to work in the UK before employment commences.

Our supplier standards and contractual controls require suppliers, where proportionate and relevant, to comply with applicable anti-slavery legislation, prohibit forced labour and child labour, avoid the charging of recruitment fees to workers, maintain appropriate employment records, notify us of relevant concerns, and cascade appropriate standards through their own supply chains and subcontractors.

6. Assessing and managing risk

We consider the risk of modern slavery within our directly employed workforce to be low, given that all operations are based in the UK, employees are engaged under UK employment law, age and right-to-work checks are undertaken, and recruitment costs are not borne by employees.

We recognise that risk is not eliminated by operating in the UK and that modern slavery may occur in domestic supply chains, particularly where there is labour-intensive work, agency or seasonal labour, subcontracting, low visibility over workers, or complex overseas manufacturing. Our risk assessment therefore focuses on the risk to workers, not only on legal, reputational or commercial risk to Away Resorts.

7. Due diligence and supplier management

We take a risk-based and proportionate approach to supplier due diligence. This means that more detailed checks are focused on suppliers, categories and projects that present a higher inherent risk of labour exploitation.

Our supplier onboarding and approval processes include appropriate checks on supplier identity, services, ownership and compliance requirements. Where relevant, suppliers may be asked to confirm compliance with applicable modern slavery and employment legislation, provide information about their own labour practices, confirm whether they use subcontractors or labour providers, and agree to contractual obligations addressing modern slavery risk.



Our standard contracting processes include anti-slavery provisions where appropriate, including obligations to comply with applicable law, maintain appropriate records, notify Away Resorts of relevant concerns, cooperate with reasonable enquiries, and permit remedial action or termination where serious non-compliance is identified.

For existing suppliers, we undertake periodic reviews and category-based assessments where risk indicators are identified. Where suppliers are higher risk, our response may include additional due diligence questions, engagement with the supplier, enhanced contractual protections, corrective action plans, monitoring, or exit from the relationship where the supplier fails to cooperate or remediation is not possible.

During 2025, our work included:

- maintaining central supplier approval processes for new suppliers;
- continuing to review supplier categories and contracts through the Legal and Procurement functions;
- reinforcing the expectation that suppliers comply with applicable anti-slavery and employment legislation;
- continuing to apply group standards to previously integrated parks and business functions;
- maintaining right-to-work checks and recruitment controls across our UK workforce; and
- reviewing this statement against current best practice and updating it to include clearer governance, risk, due diligence, training and effectiveness disclosures.

8. Our people and employment practices

We are committed to providing a safe, respectful and legally compliant working environment. Our people controls are designed to ensure that employment is freely chosen and that colleagues are treated with dignity and respect.

All employees are required to provide evidence of their legal right to work in the UK. We verify age and right-to-work documentation before employment commences. We issue employment documentation, pay through payroll, comply with applicable wage and working time requirements, and do not permit the charging of recruitment fees to employees. Where accommodation is provided or arranged in connection with employment, we expect the arrangements to be lawful, safe, transparent and not used to restrict a worker's freedom to leave employment.

Employees are encouraged to raise concerns through their manager, the People team, the Legal function or the Whistleblowing Policy. Concerns can be raised without fear of retaliation.

9. Training and awareness

We raise awareness of modern slavery risks through our policies, Employee Handbook, internal communications and guidance to relevant teams. Employees involved in recruitment, procurement, contract management and operational supplier management are expected to understand the need to identify and escalate concerns.

During 2025, we continued to use our internal policy framework to support awareness of fair treatment, equal opportunities, dignity at work, whistleblowing and lawful employment practices. During 2026, we intend to develop more targeted modern slavery awareness materials for colleagues with procurement, People, Legal and operational supplier management responsibilities, with completion and engagement to be recorded where practicable.

10. Reporting, investigation and remediation

Away Resorts encourages employees, suppliers and other stakeholders to report concerns relating to modern slavery or labour exploitation. Reports may be raised through line management, the People team, the Legal function or whistleblowing channels. All concerns are taken seriously and reviewed appropriately.

If we identify or suspect modern slavery, our response will be guided by the need to protect potential victims and prevent further harm. Depending on the circumstances, this may include urgent escalation, investigation, supplier engagement, seeking specialist advice, notifying relevant authorities where appropriate, supporting remediation,



requiring corrective action, suspending work, or terminating a supplier relationship. Termination will not be used as an automatic first response where it could increase harm to workers; however, Away Resorts will disengage where a supplier is unwilling or unable to address serious concerns.

11. Monitoring effectiveness and continuous improvement

We recognise that modern slavery risk management should improve year on year. We monitor the effectiveness of our approach through governance review, supplier onboarding controls, contract reviews, employee reporting channels and engagement between the Legal, Procurement, People and Operations teams.

During 2025, no confirmed instances of modern slavery were identified through our formal reporting channels.

Area measured	2025 position	Priorities for 2026
Governance	Board-level annual approval and senior management oversight maintained.	Maintain annual Board approval cycle and document management accountability.
Risk assessment	Key risk areas identified, including labour-intensive services, construction/refurbishment, agency or seasonal labour, food supply chains, uniforms, textiles, merchandise and imported goods.	Continue to focus on key risk areas listed.
Supplier due diligence	Supplier onboarding and approval processes maintained, with enhanced review where Legal or Procurement identify higher-risk arrangements.	Develop a more standardised questionnaire or evidence request for higher-risk suppliers.
Contract controls	Anti-slavery obligations included in standard contracting processes where appropriate.	Continue embedding anti-slavery obligations, audit/information rights and termination rights in relevant supplier contracts.
Training and awareness	Policies and internal communications supported employee awareness.	Continue to develop modern slavery training for teams whose roles are most likely to involve identifying or encountering modern slavery risks.
Reporting and remediation	Formal reporting channels available; no confirmed cases identified through those channels during the reporting period.	Maintain a clear log of modern slavery concerns, investigations, outcomes and lessons learned.

12. Approval and signature

This statement has been approved by the Board of Directors of Away Resorts Limited and will be reviewed annually.

Signed

Name
Position

Carl Castledine
Chief Executive Officer and Director