

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes our slavery and human trafficking statement. Responsibility for the preparation and publication of this statement resides with the Managing Director

INTRODUCTION

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Prestige Homeseeker Park & Leisure Homes Ltd are committed to trading ethically with zero tolerance for modern slavery, human rights violations and child labour. Integrity and transparency are at the heart of our business dealings and relationships and we are committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either our own business or in any of our supply chains.

PUBLIC REPORTING OF NON-COMPLIANCE

Individuals who have reasonable suspicion or evidence of non-compliance with the Modern Slavery Act in connection with any Prestige Homeseeker supply chain or third party contractor we engage with are encouraged to report their concerns to the Managing Director using the following confidential email address privacy@phplh.com. Alternatively, anyone who holds information that could lead to the identification, discovery and recovery of victims of modern slavery or human trafficking in the UK, can contact the Modern Slavery Helpline on 08000 121700 or alternatively follow the link to the National reporting mechanism;

www.gov.uk/government/publications/how-to-report-modern-slavery/how-to-report-modern-slavery

and

www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms

VICTIM SUPPORT

If you think you are a victim of modern slavery or human trafficking, use the victim support link to contact the Modern Slavery Helpline. Trained operators will help you to understand what is available including information, advice and ways to access government-funded support. The Modern Slavery Helpline is confidential, but you are not obliged to give your name. Visit the Modern slavery website at www.victimsupport.org.uk or call the hotline on 08000 121700.

ORGANISATION'S STRUTURE

Prestige Homeseeker Park & Leisure Homes Ltd are a manufacturer of park homes and leisure lodges. The business has two bases in Northamptonshire and have in the region of 400 employees.

OUR SUPPLY CHAINS

We procure a wide range of goods and services through a diverse supply chain, which includes:

- Manufacturers & Suppliers;
- Subcontractors who provide materials, labour and plant;

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery or human trafficking in any part of our business or within our supply chains. Our policy reflects our commitment to ethical business practices; to ensuring integrity in all our business relationships; and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place within our business and supply chains.

Our ethical business practices mean that we operate responsibly and in accordance with all relevant laws and regulations. Specifically, we will:

- Promote ethical business practice;
- Ensure equal opportunities;
- Provide a safe and healthy work environment;
- Value diversity in the workplace;
- Trade ethically.

We regularly monitor and audit our business to ensure compliance with our own internal standards and the law.

RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

The Managing Director is responsible for implementing this policy; monitoring its use and effectiveness; and auditing internal control systems, policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery.

The Managing Director is also responsible for investigating allegations of modern slavery within the Company's business or supply chains.

Line Managers are responsible for ensuring that those reporting to them understand the requirements of and comply with this policy.

RISK ENVIRONMENT

In the course of our business activities, the potential risk of modern slavery arises from the following key scenarios:

- The risk that we procure goods or services for our own consumption where there is an unethical supply chain.
- The risk that we partner alongside organisations with an unethical supply chain or we engage, with organisations with an unethical supply chain.

RISK MITIGATION AND DUE DILIGENCE

Following the publication of the Act, in 2016 we have strengthened our approach to ethical and responsible sourcing.

We have reviewed our Modern Slavery and Human Trafficking Policy to ensure that it is compliant with the Act and will continue to review the policy on an annual basis.

We have mitigated risks by;

- Ensuring due diligence in identifying organisations with criminal convictions or a higher potential risk of non-compliance.
- Using vetted and monitored suppliers who demonstrate compliance with the requirements of the Modern Slavery Act.
- Updating our Standard Purchase Order and Subcontractor Terms of Contract requiring trading partners to comply fully with the Act, with any breach resulting in the termination of all live contracts. The steps we have taken will help to:
 - Identify and assess potential risk areas;
 - Mitigate the risk of slavery and human trafficking occurring in our supply chains;
 - Increase awareness through provision of information and training to employees;
 - Protect whistle blowers.

COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for or under the Company's control including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

All individuals working for or under the Company's control are required to avoid any activity that might lead to a breach of this policy.

If a conflict with or breach of this policy is suspected, may occur or has occurred, the employee must notify their line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible.

If there is uncertainty about whether a particular act, the treatment of workers or their working conditions constitutes any of the various forms of modern slavery, the employee should raise their concerns with their line manager.

The employee can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further guidance and information on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is, or may be, taking place in any part of its business or in any of its supply chains.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

Our supply chains include the sourcing of both raw materials and finished goods. Whilst our suppliers are measured in terms of price, quality, responsiveness and experience, we also ensure that those companies chosen to work alongside us have similar intrinsic company values and are committed to trading ethically with zero tolerance for modern slavery, human rights violations and child labour.

The Company expects high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes the company includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

TRAINING AND COMMUNICATION

Information and training on this policy will be provided to employees as necessary to ensure that they understand the risk that the business faces from modern slavery; are able to identify exploitation and modern slavery and understand how to report suspected cases. We also require our business partners to provide information and training to their staff and suppliers/providers.

The Company's zero tolerance approach to modern slavery is communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with the company.

BREACHES OF THIS POLICY

Sanctions for breach of the policy are clearly set out and may include either:

- Disciplinary action or dismissal if the breach is by a member of staff.
- Termination of the contract if the breach is by a supplier, contractor or other business partner.

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company will terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

FURTHER STEPS

The company will regularly review our policy and incorporate any improvements to our practices to combat slavery and human trafficking.



Debbie Foulke
Managing Director

Date: 4th April 2020