

## ***Modern Slavery & Human Trafficking Statement***

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### ***Introduction***

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. The statement sets out The Company's<sup>1</sup> actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no modern slavery anywhere in our business, including our supply chains. This statement relates to actions and activities during the financial year (1 October 2018 to 30 September 2019).

### ***Organisational Structure & Supply Chains***

The organisational structure of Starlight Camping Ltd (referred to as "The Company") comprises the trading companies Eurocamp and Alfresco Holidays and the following UK employing companies Greenbank Holidays Ltd, Greenbank Services Ltd and Select Sites Ltd.

The Company is controlled by a Board of Directors. The Company's Head Office is located in Northwich, with other offices located in Bury.

Starlight Camping Ltd is a subsidiary of the European Camping Group ("ECG"), the leaders for mobile home holidays.

The Company currently operates in the following countries: France, Italy, Spain (Costa Brava, Costa Dorada & Costa Verde), Portugal, Croatia, Holland, Luxembourg, Austria, Switzerland & Germany.

As part of the travel industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Starlight Camping Ltd is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Our supply chain activities are carried out by the ECG Support (part of Select Sites Ltd) and they are a shared fleet management entity across the European Camping Group.

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<sup>1</sup> The Company = Starlight Camping Ltd  
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ECG Support oversees an extensive supply chain and they are responsible for the selection and management of suppliers. Our supply chain activities include the sourcing of materials and equipment. Departmental Directors are responsible for compliance in their respective departments for their supplier relationships.

Our assessment to date is that our activities in relation to modern slavery and human trafficking are low risk.

### ***Responsibility***

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies
- Investigations/due diligence
- Training

### ***Our Policies***

We are committed to working responsibly and ethically as set out in our Company Code of Conduct.

The Company has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These include:

**Speak Up Policy** – which encourages employees to report concerns, including any related to modern slavery/trafficking and child or forced labour.

**Code of Conduct** – the Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. Starlight Camping Ltd strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

**Recruitment Policy** – The Company uses only specified reputable employment agencies to source labour and always verifies the practice of any new agency it is using before accepting workers from that agency.

## ***Due Diligence***

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.

## ***Risk Assessment & Training***

Our employees are aware of our Code of Conduct and the high standards expected by the Company.

## ***Approval***

This statement has been formally approved by the Directors of Starlight Ltd.

Signed

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Alain Calmé, Director  
For and behalf of Starlight Camping Ltd

Dated:

28 Feb 20

