MODERN SLAVERY ACT STATEMENT FY18

I. OUR BUSINESS:

This statement is made on behalf of Leisure Pass Group Holdings Limited ("LPGH"). LPGH is a UK-based company that specialises in designing and managing sightseeing passes in some of the world's major destinations. The city passes allow holders entry to a large number of attractions in the destination through paying one price. LPG has approx. 100 employees located within the UK and US. This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes LPGH's slavery and human trafficking statement for the financial year ending 31 December 2018.

II. OUR COMMITMENT:

LPGH is committed to ensuring that it conducts its business ethically and with integrity. LPGH does not use slave labour anywhere in its own business, nor does LPGH tolerate forced or compulsory labour or human trafficking. LPGH is committed to ensuring that no such behaviour takes place in connection with the company. This commitment extends to LPGH's supply chain. LPGH's supplier relationships are based on lawful, efficient, and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. LPG will not knowingly use any supplier that uses forced, prison, or indentured labour. LPGH ensures that all its staff receive adequate training on the requirements of the Modern Slavery Act.

III. CONDUCTING BUSINESS:

LPGH's main suppliers are the attractions included within the city pass. LPGH currently request that its suppliers comply with all applicable laws and adopt compliant working practices, including not utilising any form of compulsory labour or human trafficking. LPGH's suppliers are obliged to pass these requirements on to their own suppliers, and LPGH expects all of its suppliers to police their own supply chains in order to root out modern slavery of any kind. LPGH encourages anyone with information regarding modern slavery and human trafficking taking place at the Company or anywhere in its supply chain to make a report to the company's Compliance manager.

IV. FURTHER STEPS:

1. LPGH intend to amend their contracts with suppliers to include a confirmation of their compliance with the Modern Slavery Act.

Approved on behalf of the Board of Directors

Neville Doe CFO

Companies covered by this statement: The Leisure Pass Group Holdings Limited The Leisure Pass Group Limited The Leisure Pass Group Ireland Limited Eden Bidco Limited