

Training

Holidaybreak has required each of its businesses to complete introductory training on modern slavery to staff and, if appropriate, will update this on regular occasions throughout the year.

Holidaybreak's modern slavery training covers:

- the basic principles of the MSA Act;
- a MSA Act training presentation (including a video presentation, memo and supporting guidance documents), giving the methodology of how we as a business ensure adherence to the MSA Act;
- an overview of our divisional purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline; and
- what steps should be taken if slavery or human trafficking is suspected.

Board approval

This statement has been approved by Holidaybreak's board of directors, who will review and update it annually.

SD/-

Ajay Ajit Peter Kerkar

Director

Date: 20th October 2017

Additional links for our businesses MSA Act Directors' Statements:

Education Division: <http://www.pgl.co.uk/en-gb/about-us/how-we-operate/corporate-and-social-responsibility>

NST Modern Slavery Statement 2016/17 (the 'MSA Act'):
www.holidaybreak.co.uk/holidaybreak/dlibrary/panda/MSA_NST_August_2017.pdf

Meininger: <http://www.meininger-hotels.com/en/business/>

Director's Statement - Modern Slavery Act 2015 (the 'MSA Act')

Introduction

This statement sets out Holidaybreak's actions to understand all potential modern slavery risks related to its individual businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its individual business and their supply chains. This statement relates to actions and activities during the financial year 1 April 2015 to 31 March 2016.

As part of the travel industry, Holidaybreak recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Holidaybreak is committed to preventing slavery and human trafficking in its corporate activities and within its individual businesses, in order to ensure that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Holidaybreak including its educational and accommodation businesses:

- Education Division
- Meininger

Countries of operation and supply

The Education Division and the Meininger Division currently operates in the following countries:

- UK, France and Spain; and
- Amsterdam /The Netherlands, Brussels/ Belgium, Frankfurt, Hamburg, Cologne, Berlin, Munich / Germany, London, United Kingdom, Salzburg and Vienna / Austria.

Risk Assessment Process

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Modern Slavery Act meetings have taken place across the business, including at parent level the attendance of Holidaybreak directors at a senior management workshop with external consultants, as well as a 'top up meeting' within the individual businesses where their action plans were developed;
- A Slavery Risk form detailing potential roles and areas within the business where slavery and human trafficking may exist was distributed from Holidaybreak to be completed by our individual businesses. A risk rating system (1 low risk, 5 high risk) was allocated to each potential risk; and
- A contractual clause on the MSA Act for inclusion within supplier contracts has been distributed from Holidaybreak to our businesses. Zero tolerance for modern slavery and respect for human rights will be built into supplier contracts and also represented in dialogue, sub-contractors, customers and other business partners.

High-risk activities

- As a non-operational entity, Holidaybreak does not view any of its activities as high risk. Low and medium risks are identified in our individual businesses' Statement, links to their Statements are provided at the end of this Statement.

Relevant policies

Holidaybreak operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Anti-Slavery and Human Trafficking Policy** In accordance with the MSA Act, Holidaybreak has adopted a group led policy relating to anti-slavery and human trafficking. The policy confirms Holidaybreak's commitment to tackling slavery and human trafficking throughout our supply chains and to ensuring transparency in Holidaybreak's individual businesses. We expect the same high standards from our businesses, contractors, suppliers and other business partners.
- **Anti-Bribery & Whistleblowing policy** Holidaybreak encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, any of its individual businesses. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Holidaybreak's whistleblowing procedure is designed to make it easy for employees at any level to make disclosures, without fear of retaliation.

Due diligence

Key Performance indicators

Holidaybreak has requested each business to review its key performance indicators (KPI's) in light of the introduction of the MSA Act. As a result, specific KPI's have been identified to measure supplier effectiveness and compliance following the implementation of the MSA Act by:

- developing a system for supply chain verification in place since June 2016, whereby the organisation evaluates potential new suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by over the next number of years, whereby the organisation evaluates all its existing suppliers.

Training

Holidaybreak has required each of its businesses to complete introductory training on modern slavery to staff and, if appropriate, will update this on regular occasions throughout the year.

Holidaybreak's modern slavery training covers:

- the basic principles of the MSA Act;
- a MSA Act training presentation (including a video presentation, memo and supporting guidance documents), giving the methodology of how we as a business ensure adherence to the MSA Act;
- an overview of our divisional purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline; and
- what steps should be taken if slavery or human trafficking is suspected.

Board approval

This statement has been approved by Holidaybreak's board of directors, who will review and update it annually.

SD/-

Ajay Ajit Peter Kerkar

Date:

Additional links for our businesses MSA Act Directors' Statements:

Education Division: <http://www.pgl.co.uk/en-gb/about-us/how-we-operate/corporate-and-social-responsibility>

Meininger: <http://www.meininger-hotels.com/en/business/>