

Modern Slavery and anti-trafficking Statement

Managing Director Statement

Swift Leisure Holdings Limited, together with its subsidiaries (collectively “Swift”) understands that Modern Slavery and human trafficking is a crime which results in abhorrent abuse of human rights; constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and human trafficking.

With business operations and supply chains ranging across the globe and covering multiple jurisdictions, Swift is aware of its responsibilities to respect and protect the rights of individuals and communities affected by its activities. We remain committed to working to prevent Modern Slavery and human trafficking from occurring within our business operations and supply chains. We fully recognise the importance of collaborating with and helping our stakeholders understand the impact of modern slavery and aim to ensure we eradicate this from our operations.

We consider the biggest exposure to Modern Slavery is through our current supply chain. The Swift Supply Chain and QA departments have in place a due diligence process which includes auditing suppliers on a regular basis to ensure compliance is met and understand any potential supply chain risks. The Swift supplier auditing process for new and existing suppliers makes reference to the UK Modern Slavery Act 2015. This is executed in the supply chain areas that have been identified by Swift, as a risk. This has been carried out by mapping our supply chains by commodity related to their geographical source of supply.

To emphasise the importance of this further, the Swift Group has included an additional clause within all new supply agreements to ensure the supplier complies with the legislation. All employees are made aware of Modern Slavery legislation via the Company Employee Handbook. A Whistleblowing Policy has been re-emphasised relating to the legislation which encourages staff to report any wrongdoings or violations of the Act.

Swift continue to expand the audit programme through its Quality and HR departments and further developed the understanding and skills within the business regarding the legislation. Swift recognises that it is critical to encourage the supply base to investigate and promote the legislation throughout their supply chains.

Swift also recognises the importance of the UK Modern Slavery Act and acknowledges that a breach of the legislation is a constant threat. The company as a whole must always endeavour to highlight the risks and monitor its supplier base and business activities as a whole.

In addition to the actions already taken by the Group, Swift continue to annually appraise its processes and continue to focus on:

- Implementation of an annual audit and spot check process across a rotational selection of suppliers;
- The development and delivery of updated, revised and enhanced online training and awareness programme regarding modern slavery and human trafficking.
- The development of human rights due diligence processes for our business operations and global supply chains; and
- Ensure adequate risk records are retained to highlight the areas of the supply chain most at risk.



Structure of our organisation

Swift is the UK's largest manufacturer of touring caravans, motorhomes and holiday homes. The company has a turnover in excess of £260m and currently employs over 800 employees. Swift's head office is based in Cottingham, East Yorkshire. The Group distributes its products predominantly in the UK, however does export to Europe, Australia, New Zealand and the Far East.

Swift's heritage and dedication to manufacturing excellence spans over 50 years with the Group considered to the leader in a number of its chosen markets. As part of the manufacturing process the Group source raw material components from across the globe and as such adopt a zero tolerance for human trafficking or Modern day slavery.

In setting the Group's policies on Modern Slavery the Group focusses on ensuring:

- Both direct workers and those employed by its supply chain are not engaged with activities with result in employment under the duress of violence, harassment or intimidation;
- Employees are not into enforced overtime;
- The prohibition of child labour;
- The prohibition of discrimination; and
- All remuneration is fair and abides with local employment laws

Identification of Risk and Communication

As part of the Group's employment strategy all employees are made aware of Modern Slavery legislation via the Company Employee Handbook. Those who are directly involved in the procurement of parts are engaged with frequent updates on any legislative changes on Modern Slavery whilst encouraging annual assessments of their respective supplier contacts.

When conducting supplier audits or spot checks on Modern Slavery the Group ask suppliers a series of probing questions to ascertain working practices, both in terms of direct employment but also their respective supply chain. When risks are identified, the Group operates a whistleblowing policy such that malpractice can be identified and actioned as soon as possible. Compliance certification is also obtained as part of the on-boarding process of any new suppliers.

Due Diligence process

As part of the on boarding process of all suppliers, the Swift Ethical code of conduct is requested to be signed prior to the commencement of any trading activities. A copy of the Swift Supplier Ethical Code has been noted in Appendix I and covers areas such as:

- Child labour
- Freedom on employment
- Working hours
- Remuneration
- Respect and inclusion
- Agency labour

Training of staff

All staff when they begin their employment at Swift are presented with a copy of the handbook. This ensures all employees are up to speed with the latest Group guidelines on Modern Slavery. Those departments who work closely with suppliers such as; Procurement, Logistics & Quality also have access to further guidance and tools to understand and spot signs of Modern Slavery when conducting their day to day working practices.

Overall we look forward to continuing this journey, building our understanding, working with closely with suppliers and collaborating with other stakeholders both in our sector and beyond.



James Turner

Managing Director



SWIFT

Appendix I

ETHICAL CODE OF CONDUCT

Swift Group Ltd is setting out to work closely with suppliers to ensure that [they are taking steps to ensure that human trafficking and modern slavery and not taking place anywhere in](#) their complete supply chain, [in accordance with](#) the Modern Slavery Act 2015. The Swift Group Ltd intends to do this through trust, [transparency](#) and honesty with our suppliers, ensuring that all will meet the minimum expectations detailed below whilst together continually striving to achieve improvements where possible.

Child Labour

- ◆ There shall be no recruitment of child labour.
- ◆ Children who are younger than 16 years of age, or who are younger than the age for completing compulsory education shall not be employed.
- ◆ Children and young persons under the age of 18 shall not be employed at night or in hazardous conditions.
- ◆ The factory must maintain documentation for every worker, verifying the worker's date of birth. Where official documents are not available, a factory must be seen to take all reasonable steps to verify age.
- ◆ Companies shall develop a policy to provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child.

Employment is freely chosen

- ◆ There shall be no forced, bonded or involuntary prison labour or any form of human slavery, servitude or human trafficking.
- ◆ 'Human trafficking' means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
- ◆ Swift Group Ltd strictly prohibits any exploitative labour practices or any associated criminal conduct.
- ◆ Workers are not required to lodge "deposits" or their identity papers with their employer, and are free to leave their employer after reasonable notice.

Hours of work

2. Employees should not be required to work more than the maximum regular and overtime hours allowed by the law of the country of operation. No more than 48 hours per week are worked on a regular basis and no more than 12 hours per week overtime on a regular basis.
3. Overtime must be voluntary and not used to replace regular contracted hours. Workers must be compensated at a premium rate according to national law.
4. Holidays should be granted in accordance with local laws and employees shall be given, except in extraordinary business circumstances, at least one day off per week.

Wages and Benefits

- (A) Wages and benefits paid for the standard working week must meet, as a minimum, national legal standards.
- (B) Swift Group Ltd will seek to work only with suppliers who ensure wages paid meet basic needs and provide some discretionary income.
- (C) All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid including any deductions at a rate that is fair and reasonable by local standards and must be lawful and not discriminatory. Ensuring that the deductions from wages as a disciplinary measure shall not be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

No Harsh Inhumane Treatment is Allowed

- ◆ Every employee shall be treated with respect and dignity.
- ◆ Workers shall not be subject to any form of physical, sexual or mental harassment or verbal abuse.

Sub Contractors

- Suppliers and manufacturers for Swift Group Ltd must ensure any sub-contractor is aware of and has given a written commitment to comply with this Code of Conduct.

Agency Labour

- a. If workers are sourced from a third party, suppliers must ensure that the third party is reputable and (if required) properly licensed.
- b. Suppliers must take reasonable steps to ensure that all workers supplied have the right to work in the country of operation, and are engaged on terms that comply at least the minimum legal requirements in that country..
- c. Agencies must be aware of, and given a written commitment to comply with this Code of Conduct.

Audits

- Swift Group Limited have taken every possible step forward to ensure that the company meets all the necessary regulations set out by the directive. This includes the full backing and responsibility of the board of Directors and should signal the importance of this to you as a supplier. Therefore it is important to Swift that you comply with this directive and in the spirit of openness and transparency we would encourage you to discuss any concerns with Swift Group Limited as soon as they arise.



Supplier Declaration:

We, undersigned, have read the Swift Group Ltd Ethical Code of Conduct, and understand that business with Swift Group Ltd depends upon full compliance with this Code. It is further understood that failure to abide by any part of this Code may result in the termination of our contract and the cancellation of all outstanding orders without compensation.

We agree that should any non-compliance issues raised by regular audits and inspections, will with the co-operation of the Swift Group Ltd, formulate a timetable for the rectification of these points to ensure that all actions will be implemented to safeguard full compliance.

Company Name:

Signature:

Address:

Print Name/Title:

Date:
