Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that Parkwood Leisure Ltd has taken, and is continuing to take, to make sure that Modern slavery or human trafficking is not taking place within our business or supply chain during the year ending 31 Dec 2025.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Parkwood Leisure Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Structure, Business & Supply Chains

Parkwood Leisure Ltd is registered in England and Wales under Company No: **03232979**.

Parkwood Leisure Ltd specialises in the development and operation of leisure facilities on behalf of Local Authority clients. Since our formation in 1995 we have grown considerably, managing a diverse range of sites throughout the country. Today we are one of the most experienced providers of Leisure Management in the UK employing over 576 members of staff.

The procurement activities carried out by Parkwood Leisure Ltd mainly relate to repairs and maintenance, equipment, cleaning, utilities and catering, with UK and EU sourced labour. We work with a variety of suppliers from large corporations to subcontractors and small local suppliers providing a wide range of products and services.The majority of our suppliers are based in the UK.

Our Policies on Slavery and Human Trafficking

Parkwood Leisure Ltd is aware of our responsibilities, service users, employees and the local communities and expects all suppliers working with Parkwood Leisure Ltd to adhere to the same ethical principles.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

Currently all awarded suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent to Parkwood Leisure Ltd's anti-slavery policy. In addition, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high risk sectors and product categories and indeed this has been referenced in the Government's Modern Slavery Strategy. Many aspects of the LSAS align to the seven reporting areas that the Government has outlined and should appear within any slavery and human trafficking statement.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Recruitment policy:** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved Frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or

individuals being forced to work against their will.

2. **Equal Opportunities:** We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

3. **Safeguarding policy:** We adhere to the principles inherent within both our safeguarding children and adults policies. These are compliant with the Parkwood Leisure Ltd agreements and provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

4. **Whistleblowing policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

5. **Standards of business conduct:** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our approach to procurement and our supply chain includes:

- Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes
- Requiring that the main contractor provides details of its sub-contractor(s) to enable the Trust to check their credentials
- Randomly request that the main contractor provide details of its supply chain
- Ensuring invitation to tender documents contain a clause on human rights issues
- Ensuring invitation to tender documents also contains clauses giving the Trust the right to terminate a contract for failure to comply with labour laws
- Using the standard SupplierSelectionQuestionnaire (SQ)that has been introduced (which includes a section on Modern Day Slavery)

Parkwood Leisure employees must contact and work with the procurement department when looking to work with new suppliers so appropriate checks can be undertaken.

Supplier adherence to our values: We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit.

Where it is verified that a subcontractor has breached the child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulations 2015. The Trust will require that the main contractor substitute a new subcontractor.

Training

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our safeguarding leads. It is also discussed at our compulsory staff induction training.

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from our staff, the public,or law enforcement agencies to indicate that modern slavery practices have been identified.

Responsibility & Implementation

The company directors and senior management take responsibility for implementing the Modern Slavery and Human Trafficking Policy and this statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of the Modern Slavery and Human Trafficking Policy is accessible to all employees electronically or can be obtained from the HR department upon request. This policy statement will be reviewed annually and published.

This statement is made pursuant to section 54(1) Modern Slavery Act 2015 and constitutes Parkwood Leisure Ltd's Slavery and Human Trafficking statement for the financial year ended 31 December 2025. It has been approved by its Board of Directors.

Signed……

Name: Glen Hall

Position: Managing Director, Parkwood Leisure Ltd

Financial Year End: 31/12/2025

Dates this statement covers: 01/01/2025 - 31/12/2025

Parkwood Leisure Ltd