

Golfbreaks Modern Slavery & Human Trafficking Statement

Introduction

This statement is made on behalf of Golfbreaks Ltd pursuant to the Section 54(1) of the Modern Slavery Act 2015 and sets out the steps that have been taken and continue to be made, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain during our financial year ending 31st October 2019.

Our Business and Supply Chains

Golfbreaks Ltd is one of the world's largest and longest established golf travel companies and was formed in 1998. Golfbreaks organises golf breaks, holidays and tournament experiences for over 230,000 golfers annually at over 2,500 resorts and golf courses in the UK, Europe and Worldwide.

The 150 staff in the main company headquarters in Windsor, Berkshire, UK also support the local sales offices in Charleston, South Carolina, USA and Copenhagen, Denmark.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

Our Policies and Training

Golfbreaks Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy – we encourage all employees to report any suspicion of slavery or human trafficking without fear of retaliation.
- Venue Supply Agreements – we have updated our Venue Supply Agreements to make explicit reference to slavery and human trafficking and the compliance expected from our suppliers.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff. We will also require our business partners to provide training to their staff and suppliers and providers.

Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPI's) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The number of our employees trained on human rights, modern slavery and human trafficking;

- The number of modern slavery cases reported under our whistleblowing procedure or otherwise;
- The number of terminated supplier agreements due to failure to comply with the laws and restrictions outlined within the agreements related to slavery and human trafficking.

The Directors of Golfbreaks Ltd. noted below approved this statement on the 28th March 2019

Signature of Director

A handwritten signature in black ink that reads "Andrew Stanley". The signature is written in a cursive style with a long, sweeping underline.

Andrew Stanley
CEO, Golfbreaks.com