

# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY/STATEMENT

#### Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 2 October 2022.

Premier Marinas Limited ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its services. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

# **Organisational structure**

Premier Marinas Limited is the parent company of the Premier Marinas group and has business operations in the United Kingdom.

We operate in the marine leisure sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment and buildings for our premises, and services, such as outsourced business processes, IT software and marketing services

For more information about the Company, please visit our website: www.premiermarinas.com

#### **Policies**

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

These include the following:

- Recruitment and selection policy Our HR policies seek to ensure no bullying or harassment is suffered by our employees
- Whistleblowing policy Our whistle blowing policy provides a route for all employees to make a complaint if issues are noted.
- Staff code of conduct Our Staff Hand Book seeks to ensure all staff are aware of the risks associated with modern slavery

#### **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Annual Review of existing supplier base.
- Confirmation of compliance from new suppliers.

Our due diligence procedures aim to:

• Identify and action potential risks in our business and supply chains.

- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistle-blowers.

### **Risk and Compliance**

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through reviewing on a regular basis all aspects of the supply chain.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK and in low-risk industries.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately

## Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- The number of our staff trained about modern slavery issues and therefore increasing awareness within the Company.
- The number of suppliers assessed annually
- The number of new suppliers confirming their compliance with the Modern Slavery Act 2015

### Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company