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Modern Slavery

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HOBURNE LIMITED AND BURRY & KNIGHT LIMITED

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR 2017/18

This statement sets out the steps taken by Hoburne Limited, company registration number 01102096 and its group companies, and Burry & Knight Limited, company registration number 00552582 and its group companies. (referred to as "we," "us," "our," "Hoburne" or "Burry & Knight") pursuant to section 54, Part 5 of the Modern Slavery Act 2015 (Act). This statement refers to 30 November 2018 financial year end for Hoburne Ltd and 30 September 2018 for Burry & Knight Ltd. There have been no changes in company structure since publishing the 2016/2017 statement.

INTRODUCTION AND OUR POLICY

The Hoburne and Burry and Knight groups include Hoburne Ltd, Burry and Knight Ltd and their subsidiaries, as defined in section 1159 of the UK Companies Act 2006. Our registered office is 10 Hoburne Lane, Highcliffe, Christchurch, Dorset, BH23 4HP, United Kingdom.

Hoburne has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically, 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. As a family business, our shareholders expect us to conform to the highest ethical standards at all times. Our ethics code is set out across a number of policies such as our anti bullying and harassment policy, whistleblowing policy, recruitment and selection policy, equal opportunities and diversity policy and anti-corruption and bribery policy.

OUR BUSINESSES

Hoburne Ltd and its sister company Burry & Knight Ltd trade as Hoburne Holidays. Our business was founded in 1912 and continues to operate as a family owned business with eight holiday parks and a residential park within the UK offering holiday home ownership and holiday accommodation to our customers.

Burry & Knight Ltd and its subsidiary Hoburne Development Company Ltd have a long history of building high quality properties in the South of England which goes back over 50 years. The company has been involved in the development of houses, bungalows, flats, apartments and commercial properties throughout the region.

Burry & Knight owns and operates two of our holiday parks and three golf courses along the south coast. It also owns and manages commercial and residential rental properties within the local area.

OUR PEOPLE

Our employees are based in our holiday parks, golf clubs and our group support/head office. We operate only in the UK and abide by all employment laws. As such, we believe that we are at low risk of modern slavery in our employee base. We have a strict recruitment process to verify eligibility to work and all new seasonal and permanent employees are guided through our grievance procedures and employee code of conduct. We are committed to promoting equal opportunities and diversity in employment in line with the Equality Act 2010. We operate a whistleblowing policy and

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The company will not support or deal with any business knowingly involved in slavery or human trafficking. Our main suppliers are all UK registered and many have a long history with us. We consider our main risks to be third-party contract labour in the construction industry and caravan manufacturing.

Our 2016/2017 statement outlined the steps we would be taking in relation to our suppliers. Over the last year we have conducted an audit of our suppliers and contractors, we mapped out the areas of risk and have written to all of those identified as higher risk of being potentially exposed through their supply chains to modern slavery. We asked our suppliers to complete a questionnaire and to submit a copy of their Modern Slavery Policy as well as outlining our Policy and the steps that we would be taking.

Many of our contractors publish their own policy and are members of global networks, which provide supplier risk management and compliance, and supplier visibility. Some of our suppliers, however, fall below the government threshold of having to publish their own policy. We recognise that supporting the business community and taking steps to help eradicate modern slavery should be adopted by all businesses no matter of size. To give us the assurance that they support our policies and have their own policies and controls in place, we also sent follow up letters and a questionnaire to those 'At Risk' suppliers who had not replied and were under threshold for publishing their own policy.

We have reviewed and assessed the responses received and are satisfied that those suppliers contacted have either taken steps to manage the risks within their own business and supply chain, or are at least accepting of our Policy and have acknowledged awareness of the potential risks where they fall below the threshold.

DUE DILIGENCE, RISK ASSESSMENT PROGRAMME AND MEASURING EFFECTIVENESS

The Directors recognise our responsibility to meet human rights responsibilities and this is supported by Hoburne Group shareholders. We will be working to assess and respond to the risk of modern slavery and incidences of modern slavery and we will continue to publish and update when further progress has been made.

We have internal procedures in place for procurement and carry out due diligence on all suppliers before allowing them to become a preferred supplier.

During the year and throughout our review, we have found no areas of concern, instances of non-compliance or non-acceptance, however, we recognise that we need to continue to assess on an ongoing basis.

We pledge to continue to audit our supplier chain, map out high-risk areas to improve our understanding of our suppliers' policies and practices to combat Modern Slavery, to raise awareness of Modern Slavery and Human Rights and to affirm our zero-tolerance approach. We will continue to disclose our findings in future statements.

We will continue to request acceptance of our anti-slavery policy and remove any supplier from our approved supplier list should any instances of modern slavery come to light.

TRAINING FOR STAFF

Our statement, policies and information on Modern Slavery are available on the Hoburne intranet hub.

We will be providing staff training to increase awareness of our Hoburne policies across all departments to embed a culture of learning and joint ownership in tackling modern slavery.

Signed on behalf of Hoburne Ltd and Burry & Knight Ltd Boards of Directors.

 Capture2

R.S. Kennar

Chairman

Dated: 5th June 2019

GREAT SERVICE
ALL YEAR ROUND

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Hoburne Limited (registered company number 01102096).

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