

# Modern Slavery Act Transparency Statement 2022/23

## Introduction

Forge Holiday Group Ltd is publishing this statement under Section 54 of the UK Modern Slavery Act 2015 (**MSA**). This requires businesses that meet certain criteria (e.g. they are bodies corporate, they carry out business in the UK, they supply goods or services and they have, or together with their subsidiaries (including those operating outside of the UK) they have, an annual turnover of £36m or more net of taxes (**Criteria**)) to state the actions that they have taken during the financial year to ensure modern slavery and human trafficking is not taking place in their business or supply chains.

This statement refers to the financial year ending 30 September 2023 and it covers Forge Holiday Group Ltd, Sykes Cottages Ltd, Forest Holidays Ltd and UKCaravans4Hire.com Ltd (**Relevant Companies**).

## Our Business Structure

The Relevant Companies, their UK brands and operating subsidiaries (**Business**) comprise (a) a parent/umbrella/Group services company (Forge Holiday Group Ltd), (b) an independent holiday rental agency (Sykes Cottages Ltd), (c) a short break holiday business in the UK (Forest Holidays Ltd) and (d) a caravan rental agency (UKCaravans4Hire.com Ltd).

The Relevant Companies have over 1800 employees and operate in the UK and Ireland.

The aim of the Business is to bring people together as a leading holiday group to create lasting memories with a positive impact on people and planet.

As a Business we are committed to continuing to improve our practices to combat slavery and human trafficking in our business and supply chains.

Financial Reporting, Procurement and GRC all have roles in preventing Modern Slavery within the Business, examples of which include:

- Financial reporting – supplier onboarding checks etc;
- Procurement – following policies in supply chains;
- GRC – monitoring and assuring on Modern Slavery issues.

## Our Business Supply Chains

The Relevant Companies supply chains include (in no particular order):

- them acquiring IT equipment, software products, services and apps;
- marketing related spend with third parties;
- them leasing offices and paying for the services and overheads connected with that;
- them engaging a number of providers of maintenance/domestic cleaning services;
- them engaging professional advisors and consultants to assist them in their operations (e.g. persons to develop technology and intellectual property, to support employees, to meet holiday letting property owners, specialists);
- them engaging a number of suppliers of building materials including but not exclusive of timber, steel and roof tiles;
- spend with the third parties that insure them; and
- them lending funds from providers of equity and debt.

Sykes Cottages Ltd also refers property owners to a number of suppliers (cleaners, maintenance persons, fire risk assessors etc.) that property owners engage and authorise Sykes to pay on their behalf (**Pay on Owner Behalf Suppliers**).

Forest Holidays Ltd's supply chain also consists of them acquiring goods for retail, food and beverage, consumables and disposables and construction and property related spend (including personnel and materials) as they engage persons to support them in acquiring, building and maintaining their Forest based sites for consumers to visit.

The Business understands that the following areas give rise to a greater risk of modern slavery – the maintenance, domestic cleaning and building personnel sector, plus the jurisdictions from which its raw materials come from.

As part of our supplier onboarding process, all new suppliers to a Relevant Company and Pay on Owner Behalf Suppliers are required to sign a declaration to confirm (a) they comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force, including but not limited to the MSA 2015 or the equivalent in the jurisdiction(s) in which they operate and (b) they have not been convicted of an offence involving slavery and human trafficking or been the subject of any investigation, inquiry or enforcement proceedings regarding any offence or alleged offence of or in connection with slavery and human trafficking. Our supplier onboarding process is regularly reviewed and updated.

Sykes Cottages Ltd has a number of local office locations and local suppliers are used where possible. Account management relationships provide an avenue for suppliers to

report concerns to the company and the internal whistleblowing policy and compliance functions provide clear and transparent routes to escalate any relevant concerns.

Where possible, Forest Holidays Ltd commit to buying locally and using local contractors and trades people on site for the purposes of forging relationships, and having better visibility of, local activity providers and their practices.

The remit of our independent risk and assurance function includes monitoring matters related to modern slavery and supply chain transparency.

The Business will be monitoring the following Key Performance Indicators in the next fiscal year:

- Percentage of suppliers onboarded in line with process;
- Percentage of suppliers overall with suitable MS provisions in place;
- Employee training completions.

## Policies

We have a number of appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies. These policies are as follows:

- right to work checks;
- supplier onboarding policy;
- whistleblowing policy;
- code of ethics for each of Sykes Cottages Ltd and Forest Holidays Ltd;
- anti-bribery corruption and money laundering policy;
- anti-facilitation of tax evasion policy.

As part of our B Corp improvement and environmental action plan, we will be developing a supplier code of conduct policy for the Business within the next 12 months.

## Training

Some of the Relevant Companies have received Modern Slavery training, however the Business plans to add a training module to our existing online training portal for the whole Group within the next 12 months. Completion of this training will be mandatory for all employees.

This statement has been reviewed and approved by the Boards of Directors of Forge Holiday Group Ltd, Sykes Cottages Ltd, Forest Holidays Ltd and UKCaravans4Hire.com Ltd on 20th March 2024.

Michael S Graham.

**Michael Graham**  
**Group CFO**  
**(Director)**  
**Forge Holiday Group Ltd**