

Modern Slavery Act Transparency Statement 2023/24

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 27 September 2024 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 currently have 1700 employees in total 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.

Our Commitment to Preventing Modern Slavery

As a Business we are committed to preventing modern slavery and human trafficking in all aspects of our business and supply chains. We recognise our role in ensuring ethical practices and safeguarding human rights. This statement outlines the steps we take to address modern slavery risks, including:

- Our business supply chains and the due diligence we do in respect of our suppliers;

- the due diligence we do in respect of our people and how we approach the treatment of our people;
- the parts of the Group's business that we have identified as higher risk, and what steps we take to manage this;
- policies and training for employees on modern slavery and human trafficking;
- the avenue we've made available to whistle blow on slavery and human trafficking.

Our Business Supply Chains

The supply chains of the Relevant Companies encompass a range of services, including:

- Procurement of IT equipment, software products, services, and applications;
- Marketing expenditures with third-party providers;
- Leasing office spaces and covering associated services and operational costs;
- Engagement of maintenance and domestic cleaning service providers;
- Collaboration with professional advisors and consultants for various business functions, such as technology and intellectual property development, employee support, interactions with holiday letting property owners, and specialist expertise;
- Sourcing of building materials, including but not limited to timber, steel, and roof tiles;
- Financial transactions with third-party insurers;
- Securing equity and debt financing from financial institutions.

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 sectors such as cleaning, maintenance and construction – as well as sourcing materials from certain regions – pose a higher risk of modern slavery and are committed to mitigating these risks through our supplier onboarding process and local sourcing wherever possible.

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.

Supplier Onboarding

As part of Sykes Cottages Ltd's supplier onboarding process, all new suppliers and the 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.

The Business plans to include an anti-slavery and human trafficking declaration within all other Relevant Companies supplier onboarding processes within the next 12 months.

Our People and Culture

We are committed to ensuring fair pay for all our employees and confirm that we pay all employees National Living Wage or above in line with legislation. We also follow fair recruitment practices, verify right to work before employment begins and provide legally recognised contracts of employment.

We foster a workplace culture where every employee is valued and treated with dignity and promote Equality, Diversity and Inclusion. We support employee mental, physical and financial wellbeing, and provide access to support services, initiatives and policies.

We have a zero tolerance for discrimination and harassment supported through our policies, procedures and training.

Our Policies & Training

We have a number of appropriate policies and procedures 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 and procedures include:

- right to work checks;
- supplier onboarding policy;
- whistleblowing policy;

- code of ethics (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 are currently in the process of developing a Group level supplier code of conduct to further enhance accountability.

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.

Whistleblowing

We have zero tolerance to slavery and human trafficking. We encourage our employees to raise concerns through our Whistleblowing Policy without fear of retaliation, including circumstances that may give rise to slavery or human trafficking concerns.

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 31st March 2025.



Charlotte Owen
Group CFO
(Director)
Forge Holiday Group Ltd