



## **Modern Slavery Statement for the Financial Year ending 30 September 2019**

### **1. Introduction**

'Modern slavery' is a crime which encompasses slavery, servitude, forced or compulsory labour and human trafficking.

This statement covers the following companies within the group (which, for the purposes of this statement, is the "Group"<sup>1</sup>):

- On the Beach Group plc
- On the Beach Travel Limited
- On the Beach Limited
- Sunshine.co.uk Limited
- Classic Package Holidays Limited

The Group has a zero tolerance approach to any form of modern slavery. We are committed to acting with integrity and transparency to help eradicate any modern slavery in our business and supply chain. This statement sets out the steps we have taken and continue to take during the financial year to combat against modern slavery.

### **2. Our Business & our supply chain**

On the Beach is a fast-growing leading online retailer of beach holidays and we act as agent to facilitate holiday bookings for our customers. The majority of the Group's business is operated from the United Kingdom, but we also operate websites in Sweden, Norway and Denmark, and we serve millions of customers every year.

The Group employs approximately 500 people, located at its Digital HQ in Manchester and its Operational HQ in Cheadle, and also has a small number of overseas employees and contractors.

When arranging holidays, the Group's trading companies act as an agent only and customers contract directly with their chosen suppliers of flights, hotels and/or transfers. For flights, the Group tends to act as agent for the consumer, except where a specific agency agreement is in place with an airline. For hotels and transfers, the Group has contracts in place with suppliers which enable it to sell the relevant services to the customer as agent for the supplier. For holidays sold after 1 July 2018, which are 'packages'<sup>2</sup>, the Group acts as "package organiser" and has obligations to ensure the package holiday is properly performed by the customer's suppliers even though it is acting as an agent.

### **3. Our Policies**

The Group has in place a number of policies and procedures to ensure that we are conducting all business in an ethical and transparent manner. Our policies and procedures include:

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<sup>1</sup> This statement does not cover Classic Collection Holidays Limited, another group company because it has its own Modern Slavery statement which is available on its website, [www.classic-collection.co.uk](http://www.classic-collection.co.uk).

<sup>2</sup> Within the meaning of the Package Travel and Linked Travel Arrangements 2018

- **Anti-Bribery and Corruption Policy** – guidance on recognising and countering bribery and corruption.
- **Anti-Slavery Policy** – outlines our stance on modern slavery, how to recognise it and report it.
- **Recruitment** – our recruitment procedures include checks of eligibility to work legally in the UK.
- **Whistleblowing Policy** – employees are encouraged to raise concerns about any wrongful treatment or practice within our business or supply chain, including potential acts of modern slavery.

We encourage openness and will support anyone who raises genuine concerns under these policies.

#### 4. Our Suppliers

The Group acts as a travel agent rather than a tour operator. Suppliers provide the relevant holiday element directly to the customer and not to the Group. However, as a responsible travel agent, we ensure that (where possible) our supplier contracts contain a clause which requires both parties to comply with all relevant laws and regulations. Our standard contracts include specific references to compliance with labour laws and employee welfare standards. As part of our due diligence when we contract with a new supplier, we include in our due diligence questionnaire, questions about their compliance with labour laws and employee welfare, and specifically in relation to steps taken to combat modern slavery. If the Group ever becomes aware of any instances of modern slavery, we would cease our relationship with the supplier concerned immediately.

The Group will continue to assess and mitigate any areas of potential risk in our supply chains. We will never knowingly conduct business with anyone engaged in modern slavery practices.

#### 5. Training

As part of employee induction, all employees receive information about our policies. Further training is provided to management, HR and our supply and contracting teams so they may recognise the signs of modern slavery, understand how to report it and ensure others comply with our policies.

#### 6. Our performance indicators

We encourage our employees and suppliers to be vigilant, and we will continue to review how effective the steps we are taking have been in combating modern slavery across our business and supply chain.

#### 7. Approval of this statement

The Group makes this statement pursuant to section 54 of the Modern Slavery Act 2015. This statement has been approved by the Group's board of directors, who will review and update it annually.

This statement was approved by the Board of Directors on:

Signed on behalf of the Group



Simon Cooper, CEO, 25 March 2019