



## **Modern Slavery Statement – March 2025**

### **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"):

- On the Beach Group plc
- On the Beach Travel Limited
- On the Beach Limited
- On the Beach Beds Limited
- Sunshine.co.uk Limited
- Classic Collection Holdings 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 during the financial year ended 30 September 2024 and continue to take during the financial year ending 30 September 2025 to combat modern slavery.

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

On the Beach is a fast-growing leading online retailer of beach holidays and city breaks. We act as agent to facilitate holiday bookings for our customers. The Group's business is operated from the United Kingdom and we serve millions of customers every year.

The Classic Collection arm of the Group is a luxury tour operator promoting tailor-made holidays travelling from the UK to various worldwide destinations. Classic Collection sell holidays directly to the public and via travel agents. It books customers' travel via scheduled, charter and low cost/no frills airlines or by rail, and book accommodation. It provides a UK-based concierge service to book excursions and tickets overseas and representation services in resort.

Both On the Beach and Classic Collection use the services of handling/ground agents, and transport companies to book private transfers overseas.

The Group employs approximately 600 people, located from its head office in Manchester. A very small number of overseas contractors are engaged. Only reputable agencies are used to recruit new staff and passport checks are utilised to ensure that employees are eligible to work.

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 package holidays, 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:

- **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. During 2024, we published a Supplier Code of Conduct which references our policies, our stance regarding modern slavery along with the other minimum standards which we expect of our suppliers. Our standard contracts reference compliance with our Supplier Code of Conduct and 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 forced labour/modern slavery, understand how to report it and ensure others comply with our policies.

We are aware of the recent and ongoing reviews into the effectiveness of the current legislation governing modern slavery in the UK. The Board will continue to monitor and implement any necessary changes as and when any further guidance is published.

### 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: 27 March 2025

Signed on behalf of the Group

A handwritten signature in black ink, appearing to read 'S. Morton'.

Shaun Morton, CEO, 27 March 2025