



Modern Slavery Statement – March 2026

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
- On the Beach Holidays Europe 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 2025 and continue to take during the financial year ending 30 September 2026 to combat modern slavery.

2. Our Business & our supply chain

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

During the financial year ended 30 September 2025, Classic Collection ceased trading. Prior to cessation, it operated as a UK-based tour operator promoting tailor-made holidays to worldwide destinations. On the Beach uses the services of handling/ground agents, and transport companies to book private transfers overseas.

The Group employs 487 people, located from its head office in Manchester and one role located in Ireland. 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, cruises, 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 cruises, the Group acts as a retail agent for the relevant cruise operator pursuant to agency agreements, and customers contract directly with the cruise line. 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 and Ireland.
- **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.
- **Anti-Fraud and Anti-Money Laundering Policy** – outlines our approach to preventing fraud and money laundering and defines the responsibilities and controls in place to safeguard the business.

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 2026, we published an updated 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. 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.

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 any legislative developments in both the UK and Ireland and will implement any necessary changes to our policies and procedures where appropriate.

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: 12 March 2026

Signed on behalf of the Group

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

Shaun Morton, CEO, 12 March 2026