

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT – JULY 2025

## 1. Introduction

This statement is made on behalf of Saga plc (a public limited company listed on the London Stock Exchange, registered in England and Wales, with registered number 8804263) and its subsidiaries, as listed in Appendix 1, (together, “we”, “us”, “our”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”).

The Act requires companies to explain on an annual basis the steps taken to prevent acts of modern slavery and human trafficking from occurring in their businesses and supply chains. This statement includes the steps we have taken during the financial year ending 31 January 2025.

We are committed to carrying on our business operations responsibly with a zero-tolerance approach to any slavery and human trafficking incidents which are proven to have taken place. We remain committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking do not take place in our own business or in our supply chains.

## 2. About the Saga Group

We provide products and services predominately tailored to customers over the age of 50 in the UK. Such products and services include insurance, cruises and package holidays, personal finance and the Saga Magazine. Central to the success of each of these operations are our colleagues, all of whom strive to deliver exceptional experiences to our customers every day. Our ‘Saga’ brand has been developed over the years to become a recognised and trusted brand among UK consumers aged over 50.

The varied nature of our products and services means we purchase a wide variety of goods and services from suppliers within the UK and internationally. Therefore, our supply chain is large and complex, with each supplier often having its own supply chain.

## 3. Risk Assessments

The Saga Group continues to operate a risk assessment process for new suppliers to assess any modern slavery risk which has been embedded into our Procurement & Supplier Management onboarding process. Saga has also developed a Supplier Code of Conduct which sets out the types of behaviours the Saga Group expects of all suppliers including respect for all human rights, compliance with all relevant human rights regulations, and the creation of a working environment that is compliant, safe, and fair.

In respect of existing suppliers, as part of our ongoing efforts to monitor modern slavery risk, during 2022-2023 we re-examined our existing suppliers across the Saga Group to assess the potential for any residual modern slavery risk.

The process of re-examining our existing suppliers will then be undertaken again in 2025 in line with our policy of carrying out follow-up risk assessments on existing suppliers every three years.

In 2024, we commenced a review of our risk assessment processes as part of our ongoing commitment to proactively identify and address modern slavery risks. This initiative is designed to ensure our approach remains both effective and responsive to emerging global trends, incorporating the latest data such as updated Corruption Perception Index scores and an enhanced global risk heat map related to modern slavery. By aligning our practices with the most current data, we strengthen our ability to safeguard human rights across our operations and supply chains.

#### **4. Due Diligence Questionnaires**

Any suppliers identified as high risk (following the risk assessment process outlined above) are subject to further due diligence procedures, including the completion of a due diligence questionnaire designed to further assess the level of risk and the steps required to monitor and manage that risk.

In respect of our holidays and cruise suppliers identified as high-risk, our due diligence questionnaire is distributed by the relevant business for completion by the relevant suppliers. The business sets realistic timeframes for suppliers to respond with a limited number of reminders if a response has not been forthcoming. Our non-holidays and cruise related operations (principally in the financial services sector) have been identified as lower risk; however, should further due diligence be required, procedures are also in place to put these suppliers through our due diligence processes including providing them with a similar due diligence questionnaire.

We remain committed to working with our suppliers to ensure business is conducted ethically and honestly. In particular, in respect of those holidays and cruise suppliers identified as high-risk from a modern slavery perspective, the relevant Travel business works with those suppliers who have failed our due diligence questionnaire. This has involved first checking that suppliers have understood the questions and answered them correctly followed by, if required, working with them to implement corrective action plans to rectify areas of non-compliance. This remains an ongoing process. Should a supplier fail to co-operate with our due diligence procedures and/or any corrective action plan or otherwise demonstrate little progress despite realistic time frames being agreed and set, we have and will consider our future relationship with that supplier.

During the 2024-2025 period, we undertook a review of our due diligence questionnaire as part of our ongoing commitment to identifying and mitigating modern slavery risks within our operations and supply chains. The review aimed to ensure that the questionnaire remains a reliable and effective tool for assessing supplier practices and promoting responsible sourcing.

#### **5. Policies & Training**

We are committed to working responsibly and with integrity, as set out in our Personal Standards & Ethics Policy. We require the highest standards of personal and professional honesty and integrity from our colleagues in all business dealings and relationships, including with our customers, other colleagues and suppliers.

The prevention, detection and reporting of slavery and human trafficking in any part of our business or supply chains is the responsibility of all those working for us. Our Speak Up Policy ensures all colleagues are able to confidentially and anonymously raise concerns and report suspected violations via our Confidential Speak Up Service which can be accessed online and by phone.

The Speak Up Service is communicated to colleagues as part of the corporate induction process and, in addition, it is available for our colleagues to access at any time on our intranet 'Workplace'.

Our Anti-Slavery and Anti-Human Trafficking Policy is also communicated regularly throughout our organisation. It is reviewed annually and also requires approval from the Saga plc Board every three years in line with Saga's corporate governance procedures save that any material changes to the Policy before then must be pre-approved by the Saga plc Board.

Our policies are used as the basis for our colleagues to be able to detect and prevent acts of modern slavery. These policies are available for our colleagues to access at any time through our intranet 'Workplace'.

In line with our Anti-Slavery and Anti-Human Trafficking Policy, it is a requirement that all new agreements with suppliers must be in writing and contractually oblige the supplier to comply with the Act. Where possible, it is a requirement that each agreement shall give the relevant Saga Group company concerned a right of termination in the event that the contractor or supplier is proven to have committed slavery or human trafficking offences or to have acted in a manner inconsistent with the Act. We have, therefore, developed and implemented into our template agreements, specific contractual clauses covering these points. These are reviewed and enhanced where it is felt necessary.

We have reviewed and updated our training material in relation to modern slavery to ensure it remains accurate and contains the most up-to-date information. This material is distributed to colleagues via our e-learning platform to maintain a high level of awareness and understanding of modern slavery. This updated training will continue to be rolled out to colleagues on an annual basis.

## **6. Auditing & Ongoing Compliance**

Our Internal Audit procedures incorporate an assessment of our modern slavery processes within relevant audits and in 2024 we uploaded our statement to the Government Modern Slavery Statement Registry to share the steps we are taking to prevent modern slavery in our supply chains.

We remain committed to preventing slavery and human trafficking. We will continue to seek opportunities for further improvements in assessing and developing our approach to modern slavery.

## **7. Summary**

We have systems in place to:

- Identify and assess potential risk areas within our businesses and supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Train colleagues to raise awareness of modern slavery and how to report it; and
- Protect whistleblowers.

We will continually review and refine these processes to strive to operate to the highest standards at all times.

This statement covers 01 February 2024 to 31 January 2025 and has been approved by the Board of Saga plc on 21 May 2025.



Mike Hazell  
Group Chief Executive Officer  
July 2025

## APPENDIX 1 – SUBSIDIARIES\*

- |                                      |   |
|--------------------------------------|---|
| 1. Saga plc                          |   |
| 2. Acromas Insurance Company Limited | <b>Travel and Shipping Companies:</b>   |
| 3. CHMC Limited                      | 12. Saffron Maritime Limited (Guernsey)<br>(company left the Saga Group on 22 May 2024) |
| 4. CustomerKNECT Limited             | 13. Saga Crewing Services Limited   |
| 5. PEC Services Limited              | 14. Saga Cruises Limited  |
| 6. Saga Group Limited                | 15. Saga Cruises V Limited  |
| 7. Saga Membership Limited           | 16. Saga Cruises VI Limited   |
| 8. Saga Mid Co Limited               | 17. Saga Travel Group (UK) Limited  |
| 9. Saga Personal Finance Limited     | 18. ST&H Limited  |
| 10. Saga Publishing Limited          | 19. Titan Transport Limited   |
| 11. Saga Services Limited            |   |

\* Please note the above list does not include dormant and non-trading companies