

Modern Slavery & Human Trafficking Statement

Modern Slavery & Human Trafficking Statement for Financial Year ended 31 December 2025

This statement has been approved by the board of directors of Elmo Bidco Limited on 26 March 2026 and is published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Elmo Bidco Limited, its operating subsidiary Direct Ferries Limited and other relevant group companies (together “Direct Ferries”) to prevent modern slavery and human trafficking in its business and supply chains and covers the financial year from 1 January 2025 to 31 December 2025.

Introduction

Direct Ferries is a multi-platform impartial ferry ticketing service offering a quick and easy way to look, compare and book thousands of scheduled ferry crossings to virtually any ferry port in Europe and Africa as well as many ports across the globe. At Direct Ferries, we believe we have a responsibility to ensure that our business is conducted responsibly and in an ethical manner. We do not tolerate any form of slavery, servitude, human trafficking and/or child or forced labour within our organisation or partner organisations. We are committed to continuously improving our policies, standards and practices to combat abuses of a person’s basic freedom and rights and taking steps to ensure that modern slavery, child or forced labour and/or human trafficking do not take place in any part of our business or our supply chain.

Structure and Business Model

Our operating group consists of Elmo Bidco Limited and our trading companies are Direct Ferries Limited and Direct Ferries (Ireland) Limited.

As an online travel agent, we provide a service which enables customers to quickly and easily book ferry related travel services with various third-party ferry operators (“Operators”).

Customers book through our websites. In the financial year ending 31 December 2025, we operated our own website under the Direct Ferries brand in the UK and Ireland. Our headquarters are in Ipswich, Suffolk. As at 31 December 2025, our most recent financial year end, Direct Ferries employed 105 employees as well as engaging a number of independent contractors (both in the UK and overseas) and an offshore customer service provider based in South Africa.

Direct Ferries acts as an agent in the booking process, facilitating customers contracting directly with their chosen Operator. For the ferry bookings, the Operators have appointed Direct Ferries to act on their behalf to offer customers their respective services, except in relation to certain ferry services where Direct Ferries act as agent to the customer in relation to searching and booking of the ferry travel service. The customer therefore mainly always has a contract directly with the Operator for the relevant ferry travel service.

We have built close relationships with our key Operator partners and ensure that expectations of business behaviour are clear and consistent with our ethical trading aims.

Our Supply Chain

Our supply chain includes direct and indirect contracts with Operators and contracts regarding services which support the operation of our business (including marketing, IT, software, customer services, human resources, facilities, credit card processing and professional advisory services). The Operators and providers of ancillary services that are involved in such supply chain are located in the UK and globally.

Risk Assessment

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business. The risk of slavery and human trafficking within our own organisation is minimised as a result of the recruitment policies and compliance standards that we have in place and the oversight built into our line management structure throughout our operations. We never knowingly support any unfair work or modern slavery practices. There is a greater risk of modern slavery in the ferry services provided by the Operators to customers and within the ancillary supporting services provided to Operators by third parties globally.

Direct Ferries acts as an agent and, as such, Operators provide their services directly to customers and not to Direct Ferries. However, as an ethical business, as far as possible we ensure that Operators are contractually obliged to comply with all applicable legal and regulatory obligations, including anti-slavery legislation.

Our Policies

We have implemented and circulated to all staff our Anti-Slavery and Human Trafficking Policy which reiterates our stance against modern slavery.

In addition to the Anti-Slavery and Human Trafficking Policy mentioned above, the Group has implemented a number of policies and procedures in place to ensure the business is operating in a legal, ethical and consistent manner. These are available to all staff on our internal HR portal. We continuously review and update all our policies. Our policies and procedures include:

Anti-Bribery and Corruption Policy – the Group’s guidance on identifying, reporting and countering bribery and corruption

Prevention of Facilitation of Tax Evasion Policy – the Group’s guidance on identifying, reporting and preventing the facilitation of tax evasion

Anti-Harassment & Bullying Policy – to ensure that all staff are treated and treat others with dignity and respect, free from harassment and bullying

Equality and Diversity Policy – to promote equality of opportunity for all staff and job applicants

Recruitment & Retention – our recruitment policy and procedures include verification of eligibility to work legally in the UK and our HR Department monitor compliance

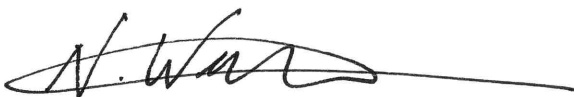
Sanctions Policy - to ensure that the Group does not work with any companies or individuals that are subject to a comprehensive sanction

Whistleblowing Policy – the Group has a procedure that encourages staff to raise their concerns about any aspect of the business and provides them a safe and protective environment to do so

Performance Monitoring & Reporting

The Group’s legal team ensures the business is complying with our stated policies and investigates any concerns raised. We encourage all our staff to report any concerns they have and reassure them that their comments will be taken seriously.

This statement will be updated annually and published on our website.



Signed by Naill Walsh, CEO, on behalf of the Board of Directors
Elmo Bidco Limited