

Travelopia

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2018/19

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ABOUT THIS STATEMENT

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This commitment is an integral part of our policies and the way we do business. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 with respect to the financial year ending 30 September 2018 and sets out the steps the Travelopia Group¹ has taken to ensure that slavery or human trafficking is not taking place in our operations and supply chains.

ABOUT THE TRAVELOPIA GROUP

Travelopia is a global provider of travel services in the specialist travel sector with a portfolio of more than 50 independently operated brands, most of which are leaders in their sector. Our businesses operate across six divisions. Expeditions, Tailormade, Marine, Education, US Tour Operations and Events. With everything from sailing adventures, safaris, sports tours to arctic expeditions, our brands are as diverse as they are exciting. We aim to create unforgettable experiences for customers all across the world, whether they're looking for an expertly led group tour or a tailor-made adventure. The Group has a truly global offering with operations across more than 30 countries, with businesses predominately in Europe, USA and Canada.

OUR BUSINESS AND SUPPLY CHAINS

Travelopia provides a wide range of specialist travel experiences all over the world. More information regarding the range of experiences offered can be found at www.travelopia.com. The diversity in our travel experiences is reflected in our supply chains. For example, in delivering a single travel experience, we might engage or interact with providers such as accommodation suppliers, travel agencies, airlines, destination management companies and tourist offices.

SUPPLIER DUE DILIGENCE & CONTRACTING

We believe that combating modern slavery offences begins with effective supplier due diligence. As part of delivering unique travel experiences for our customers, we focus on developing long-term relationships with quality suppliers. This year we have taken several new steps to ensure that we only work with ethical suppliers and that our expectations of them are clear:

- **Supplier Questionnaire:** We have enhanced the supplier due diligence we conduct. Our new Supplier Questionnaire requires that suppliers provide information on their health & safety practices, ethical standards and any sub-contractors used to provide their services. This process should provide us with greater comfort at the outset that new suppliers are committed to acting ethically or, alternatively, highlight any areas of potential concern. It should also provide greater transparency of our supply chain, a key component in reducing the risk of modern slavery.
- **Supplier Code of Conduct:** We have updated and re-launched our Supplier Code of Conduct. Along with other aspects, this document reiterates our commitment to adherence with all human rights legislation and reaffirms our zero tolerance stance to issues of child labour, forced labour, threat of violence, harassment, intimidation, debt bondage, bonded labour, human trafficking, compulsory overtime and any other form of modern slavery. We are communicating this document to all existing suppliers and, alongside the questionnaire described above, it forms a key part of the onboarding process for any new relationship.
- **Supplier Contract Wording:** We have continued to incorporate anti-slavery provisions in our contracts, as well as introducing more general wording requiring compliance with the above Code of Conduct.

¹ Travelopia Holdings Limited is the parent company of the non-U.S based Travelopia businesses. The actions in this statement are taken at a Travelopia group level but qualifying companies required to make a statement (as per the statutory turnover threshold) are: Hayes & Jarvis (Travel) Ltd, Exodus Travels Ltd and Specialist Holidays (Travel) Ltd.

EMPLOYEE TRAINING & CONFIDENTIAL HOTLINE

It is crucial that staff have been appropriately trained on issues of modern slavery, which can occur in our industry. Over the last year we have re-launched compliance training sessions for our businesses. This training includes guidance on effective supplier due diligence, as well as identifying and preventing bribery & corruption (which sometimes accompany issues of modern slavery).

In our last statement we highlighted the installation of a whistleblower hotline for our employees. This serves as a reporting channel for all manner of illegal or unethical activity across our businesses. As such, it could help identify any potential issues of modern slavery within our supply chain. In the past year we have re-communicated the availability of this tool to all employees. We will continue to take measures to ensure we remind staff of its existence during onboarding and at other key staff meetings.

EXODUS TRAVELS FOUNDATION

This year Exodus Travels launched a charity, the Exodus Travels Foundation, with the aim of using travel to create sustainable change and promote responsible travel. The foundation is focussed on using travel as a force for good and promoting responsible tourism. You can find more about Exodus' approach to responsible tourism on its website (<https://www.exodus.co.uk/responsible-travel>) but one area of focus is in ensuring that local staff and operators always receive a fair rate of pay for their services.

OUR FUTURE PLANS

We have taken some good steps over the past year but we recognise that there is still more to do. In the financial year to 30 September 2019 we aim to further strengthen our approach to managing modern day slavery risks. Specifically, we aim to carry out the following activities:

- Complete the rollout of our Supplier Code of Conduct.
- Establish a baseline percentage of suppliers who have signed up to the Code of Conduct so that we can thereafter focus on improving this year on year.
- Increase awareness of modern slavery issues internally by including additional information in employee documents.
- Conduct further staff training on supplier due diligence and issues of modern slavery.
- Ensure that standard modern slavery clauses are in place in all high-risk supplier contracts.

IMPACT AND MONITORING

We will use the tasks outline above to measure our progress in combating modern slavery. We will also consider whether we have had any instances of modern slavery cases or issues of concern.



Andy Duncan
Chief Executive Officer
Travelopia

