



SLAVERY AND HUMAN TRAFFICKING STATEMENT

May 2019

1. Introduction

Modern slavery is a crime resulting in an abhorrent abuse of human rights. This statement has been prepared in line with the Modern Slavery Act 2015 and outlines how the Company proactively manages and assesses its own operations alongside our suppliers to protect workers from being abused and exploited in our own Company and our supply chain.

2. Definition

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 which highlights that slavery can occur in a number of forms and typically includes:

- Slavery and servitude – the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another person’s property with the impossibility of changing his or her conditions.
- Forced or compulsory labour – involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.
- Human trafficking – requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them.

3. Responsibility

Whilst it is every employee’s responsibility to be aware of and highlight any areas of potential risk, overall responsibility for ensuring that the Company, its associated organisations and supply chain are compliant in relation to the Modern Slavery Act 2015 lies with the Managing Director.

4. Business Structure

Our core business is the organisation, administration and provision of worldwide escorted travel. Our head office is based at New Manor, 328 Wetmore Road, Burton-upon-Trent, DE14 1SP where all our central functions (Sales & Marketing, Operations, Product, Finance, IT, Customer Service and Reservations) are located, employing approximately 150 staff (this number can increase according to seasonal fluctuations). We also utilise the services of self employed Tour Managers who are located throughout the world and these number some 300. We also have a small office in Dublin Ireland employing 4 staff and a further office in Connecticut, USA employing 8 staff.

5. Supply Chain

Our supply chain includes the sourcing of accommodation & transport services, either directly or via a local Destination Management Company (DMC) in each country we operate in. With respect to DMC's we ensure that these are long-established and/or multi-country entities with robust working practices – however, they neither own nor directly operate the hotels or transport used.

6. Policy

We are committed to social and environmental responsibility and have zero tolerance for slavery and human trafficking. We hold ourselves and our supply chain accountable and we fully comply with the provision of the Modern Slavery Act 2015.

We recognise that modern slavery is a complex supply chain issue and we work in partnership with our customers, suppliers and other organisations to sustain long-term solutions to this issue.

We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

7. Due Diligence in our Supply Chain

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of strict policies and procedures as well as the controls built into our business operations and the knowledge and skills of our staff. We assess risk based on a number of factors including geographical risk indices pertaining to human rights, the level of supply chain control, external governance factors and levels of political stability.

We consider that the greatest risk (albeit small) of slavery and human trafficking is in our supply chain where we undertake procurement activities and where operations and managerial oversight are out of our direct control.

As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- We undertake all reasonable and practical steps, including accommodation inspections and audits, to ensure that our standards are being implemented throughout the businesses of our suppliers and that local legislation and regulations are complied with;
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the extended supply chain to at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain;
- For some countries, accommodation & transport services are obtained via a local Destination Management Company (DMC). With respect to DMC's we ensure that these are long-established and/or multi-country entities with robust working practices – however, they neither own nor directly operate the hotels or transport used.

8. Involvement in Modern Slavery

We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately.

We will only trade with those who fully comply with this statement or those who are taking verifiable steps towards compliance.

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and those issues of noncompliance are not addressed in a timely manner.

9. Training & Awareness

We will ensure that we have competent individuals within our Company who are aware of the standards we require and are able to provide guidance and support to all employees to ensure they understand the expected behaviour from both our Company and that of our supply chain.

10. Whistleblowing

We have in place a Whistleblowing Policy to encourage the reporting of concerns and the protection of whistle-blowers.

11. Review

This statement will be reviewed annually, unless circumstances dictate that it should be reviewed and/or renewed more frequently.