Travelopia

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## 2024/2025

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024/2025

## ABOUT THIS STATEMENT

The Travelopia Group[1] ("Travelopia") takes its Environment, Social and Governance ("ESG") responsibilities very seriously and continues to build upon on its existing frameworks and in particular in the 'Social' area of modern slavery and human trafficking.

Travelopia recognises that modern slavery and human trafficking are significant global issues, and we are committed to ensuring we play our part in helping to rid the world of these criminal practices. We do this by ensuring that there is no modern slavery or human trafficking in any part of our business. This zero-tolerance approach is an integral part of our policies and the way we do business.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and reflects the activities undertaken by Travelopia in the financial year commencing 1 October 2023 and ending 30 September 2024, 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 21 independently operated brands, most of which are leaders in their sector. Our businesses operate across seven divisions. Polar, Private Jet, Golf Tours, Marine & Waterways, Adventure, Tailor-made Travel and Education. With everything from yachting adventures, wildlife safaris, cultural tours to polar expeditions, our brands are as diverse as they are exciting. We aim to create unforgettable experiences for customers all across the world, whether they are looking for an expertly led group tour or a tailor-made adventure. Travelopia employs approximately 2,500 people worldwide and 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.

## POLICIES AND PROCEDURES

Travelopia has continued to update its framework of policies and procedures. Whilst these documents are key to implementing effective systems and controls, we also believe that they are a crucial ingredient in reinforcing our culture of integrity and transparency. Our policies outline the behaviours and conduct that we would expect from each other at Travelopia.

Our policies and procedures are regularly monitored and reviewed and apply to all our employees and to anyone engaged to work for us on a temporary basis.

The key policies and procedures that contribute to minimising the risk of modern slavery and human

[1] Travelopia Group Holdings Limited is the parent company of the worldwide based Travelopia businesses. The actions in this statement are taken at a Travelopia group level but qualifying subsidiary companies required to make a statement (as per the statutory turnover threshold) will also publish this statement which are Exodus Travels Limited and Specialist Holidays (Travel) Limited.

trafficking in our organisation and our supply chains are:

**Anti-Slavery and Human Trafficking Policy:** This policy has been specifically designed to help us comply with modern slavery legislation, including the Modern Slavery Act 2015, and gives our employees, workers, contractors and other business partners guidance on slavery and human trafficking and the measures taken by us to tackle slavery and human trafficking in our business and supply chains.

**Corporate Criminal Offences Policies:** We have a suite of policies, procedures, and training on the prevention of corporate criminal offences. When combined with the SpeakUp whistleblowing platform they seek to remind those working for and on behalf of Travelopia to be alert to any improper conduct and/or suspicious behaviour, and to report such concerns.

**Employee Confidential Hotline Policy:** We use a leading whistleblowing platform called "SpeakUp" provided by a third party called People InTouch. This global and user-friendly system is set out in our whistleblowing policy and is communicated to staff with the aim of encouraging everyone working for Travelopia to report any concerns about any suspected, or actual wrongdoing. Anyone with concerns including those relating to modern slavery has the option to remain anonymous and can report them through the SpeakUp telephone hotline, web portal and now also through a recently launched mobile application increasing the number of reporting channels offered to staff.

**Employee and Customer Health and Safety Policies:** We take the wellbeing of our employees and customers seriously and have a dedicated health and safety team who ensure compliance with this policy.

**Environment, Social and Governance Sub-Committee**: We have a specialist ESG Travelopia Board Sub-Committee made up of members of the Travelopia board to focus on and agree objectives and metrics to drive to continuous improvement including in the 'Social' area of modern slavery and human trafficking to build upon Travelopia's existing frameworks.

**Harassment and Bullying Policy:** This wide-reaching document not only applies to employees, but also to third parties such as customers, suppliers and visitors to our premises and is designed to help ensure that everyone is treated with dignity and respect.

**People Directorate Procedures:** Our HR departments, led by People Directors check that all our staff have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package.

**Procurement Due Diligence Procedure:** This involves careful scrutiny of potential new suppliers, making sure they have a good compliance record with laws and ethical procedures.

**Risk Management Procedure:** We have an Enterprise Risk Management framework in place with robust control systems to ensure that all Travelopia activities remain in line with all applicable laws, regulations, and codes of governance (including in relation to modern slavery and human trafficking).

**Staff Training**: We have built a compliance training programme to educate our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains and encourage staff to identify and report any potential breaches of our anti-slavery and human trafficking policy.

**Sustainability Leads**: We have Sustainability Leads in each Travelopia business division who, as part of their role, are responsible for embedding our minimum standards in supply chains, recording and reporting our environmental emissions and driving ethical and sustainable practices in each of our brands.

## SUPPLIER DUE DILIGENCE

When engaging with suppliers we have a due diligence process that takes into account a range of factors, including market reputation and environmental and ethical commitments before proceeding. We expect

these suppliers to adhere to the same high ethical and sustainability standards in the following ways:

**Supplier Code of Conduct & Minimum Standards for Sustainable & Responsible Travel:** This document contains a set of minimum standards we expect our suppliers to adhere to in the areas of sustainability and ethics. This allows us to hold suppliers to the same high standard we hold ourselves to. These documents reiterate 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.

**Supplier Contract Wording**: We endeavour to incorporate anti-slavery provisions in our contracts, as well as introducing more general wording requiring compliance with the above Code of Conduct and Minimum Standards for Sustainable & Responsible Travel.

## EXODUS TRAVELS

In January 2024 Exodus Travels Ltd. achieved certified B Corporation or 'B Corp' status recognising Exodus Adventure Travels as a purpose-driven company dedicated to continuous improvement and becoming 'even better' in terms of our social and environmental impact, using travel as a force for good. The Exodus Travels Foundation also continues to work hard with partners in our destination communities to create the conditions that support the conservation and regeneration of our natural world. You can find more about Exodus' approach to sustainability in tourism on its website (www.exodus.co.uk/sustainable-travel) as well as its B Corp status and what this means (www.exodus.co.uk/about-exodus/b-corp). This statement also applies to the Exodus Travels Foundation which is a registered charity in England and Wales (no. 1182265).

## OUR FUTURE PLANS

We recognise that due to the international nature of our business and large number of supplier relationships, a risk-based approach is appropriate in seeking to ensure that there is no slavery or human trafficking in our supply chain. We are committed to continuing our efforts to understand the specific risk areas of modern slavery and human trafficking in travel industry supply chains.



**Andy Duncan**
**Chief Executive Officer**
**Travelopia**

**31 March 2025**