

Travelopia

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2017/18

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 2017 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. Globally we employ approximately 4,000 people. This is Travelopia's first statement since it was sold by TUI Group to Kohlberg Kravis Roberts & Co L.P (KKR) in June 2017.

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.
- Airlines and other transport companies.
- Destination Management Companies.
- Travel agencies selling our product.
- Harbour authorities, Port authorities, and National Parks.
- Tourist Offices.

SUPPLIER DUE DILIGENCE

Our focus is on delivering unique travel experiences for our customers and, to this end, we focus on developing long-term relationships with quality suppliers. We expect these suppliers to adhere to the same ethical standards as we consider paramount. However, we are conscious that modern slavery in all its forms is increasing and our product range includes travel to countries where this more prevalent. We believe that combating modern slavery offences begins with effective supplier due diligence. When engaging with suppliers we therefore take into account a range of factors, including market reputation and environmental and ethical commitments before proceeding.

INTERNAL POLICIES AND PRACTICES

In addition to the due diligence outlined above, we communicate our commitment to identifying and preventing modern slavery to our employees in the following ways:

Travelopia Whistleblowing Policy:

In the recent financial year following the sale by TUI we installed our own whistleblower hotline for our employees (described in more detail below). Our policy highlights the use of this tool as a reporting channel for all manner of illegal or unethical activity across our businesses.

Anti-Money Laundering Procedures:

The unlawful proceeds of financial crime can be intertwined with illegal working practices and we have practices and procedures to prevent our acceptance of any such monies.

¹ Travelopia Holdings Limited and Travelopia USA Inc are the parent companies of the Travelopia businesses. The actions in this statement are taken at a Travelopia group level but the qualifying companies required to make a statement (as per the turnover threshold) are: Hayes & Jarvis (Travel) Ltd, Exodus Travels Ltd, Specialist Holidays (Travel) Ltd and Adventure Transport Ltd.

Travelopia Anti-Bribery & Corruption Policy:

This policy sets out rules with regard to bribery and corruption, which can accompany issues of modern slavery.

During the last financial year we reviewed and updated our policies and re-communicated them to our employees. We also implemented a whistleblower hotline for our employees, which is operational in over 30 countries. We encourage our employees to report any suspicions of illegal or unethical practices confidentially via this channel.

To ensure that issues such as modern slavery receives due attention, we have a dedicated Compliance function with direct reporting to the Board of Directors.

We employ individuals across the world and are committed to fair, transparent and positive working practices. We will continue to keep these under review and making changes as appropriate

SUPPLIER RELATIONSHIPS

We also take a range of measures to emphasise our approach externally. We have historically provided our suppliers with a Supplier Code of Conduct document, which sets out the minimum standards we expect from them, their employees, contractors, agents and subsidiaries. The document details our commitment in areas such as working conditions (including prohibition on forced labour) health and safety and the environment. We have also begun to include specific anti-slavery provisions in our supplier contracts. Travelopia also works closely with trade associations to understand particular trends and risk areas in our industry.

OUR FUTURE PLANS

In the financial year to 30 September 2018 we will continue to strengthen our existing approach to managing modern day slavery. Specifically, we aim to carry out the following activities:

- Undertake an analysis of our supply chain to identify the areas most at risk of modern slavery.
- Update our Supplier Code of Conduct to include a new section on modern slavery.
- Communicate our approach to our highest risk suppliers.
- Introduce standard modern slavery clauses for use in all high-risk supplier contracts.
- Raise awareness of modern slavery issues internally by including additional information in training and employee documents.

IMPACT AND MONITORING

We will measure our progress against the tasks above and by considering the number of modern slavery cases reported to us.

BOARD APPROVALS

The Board of Travelopia Holdings Limited originally approved this statement on the 26th February 2018. It has been re-signed by new Chief Executive Officer, Andy Duncan.



Andy Duncan
Chief Executive Officer
Travelopia

April 2018