

Travelopia

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2019/20

ABOUT THIS STATEMENT

The Travelopia Group¹ (“Travelopia”) is committed to reducing the risk of slavery, servitude, forced or compulsory labour within our business and supply chain. This is Travelopia’s third annual Modern Slavery Statement and has been published in accordance with section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Travelopia during the financial year ending 30 September 2019 to prevent modern slavery in its business operations and supply chain. This report is written in reference to the Home Office guidance. Our commitment to preventing modern slavery is embedded in Travelopia’s robust and evolving compliance system, which includes supplier due diligence, comprehensive training and a global employee confidential helpline programme.

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

Our business is diverse and this means we have an extensive supply chain covering multiple jurisdictions. These suppliers range from independent aircraft owners and ship operators to travel agencies and destination management service providers. One of our biggest supplier categories is made up of hotel partners. Accommodation suppliers are therefore a key priority in our due diligence.

SUPPLIER DUE DILIGENCE & CONTRACTING

In 2019 we continued to assess our operations and supply chain to further our understanding of modern slavery risks. This assessment has reaffirmed our view that one of the best ways to combat modern slavery is to have in place an effective supplier due diligence process. Therefore we continue to have in place the following:

- **Supplier Questionnaire – To be completed by every supplier.**
- **Supplier Code of Conduct – To be provided to every supplier.**
- **Supplier Contract Wording – To be incorporated into each contract.**

ADDITIONAL POLICIES

In addition to the supplier specific documents noted above, Travelopia has in place the following policies reflecting its commitment to acting ethically and with integrity in all its business relationships:

- Anti-Bribery and Corruption Policy;
- Anti-facilitation of Tax Evasion Policy;
- Equality and Diversity Policy;

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 Confidential Helpline Policy.

RECRUITMENT, TRAINING & CONFIDENTIAL HOTLINE

- **Recruitment** – We operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Travelopia uses only specified, reputable employment agencies to source employees and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Learning Management System (LMS)** – In this financial year, to further encourage a culture of compliance we have rolled out a new training platform for all of our employees in every location, namely LMS. We have carefully designed compliance modules with the aim of embedding a culture of honesty, integrity and compassion. By way of example, one of the modules is Travelopia’s ‘Equality, Diversity and Inclusion’ training.
- **Speak Up** – We have in place a confidential employee helpline called “Speak Up”. This is an online and phone-based system that enables employees to confidentially raise concerns relating to possible improper, unethical or illegal practices. Travelopia is committed to dealing with such reports about the company in an open and responsible manner and those that raise concerns in good faith are protected from retaliation.

EXODUS TRAVELS FOUNDATION

The Exodus Travels Foundation continues to work hard to create sustainable change and promote responsible travel. You can find more about Exodus’ approach to responsible tourism on its website (<https://www.exodus.co.uk/responsible-travel>).

OUR FUTURE PLANS

We are striving for continuous improvement in this area, and our future plans for this area include:

- Rolling out of specific modern slavery awareness training;
- Consolidating our due diligence across a broader scope of our supply chain;
- Looking at better ways to remediate some of our key risks in our supply chain.

MONITORING

Travelopia’s board of directors will continue to support the group’s compliance function which has oversight of the modern slavery policy.



Andy Duncan
Chief Executive Officer
Travelopia

March 2020