

# Modern Slavery Act Statement

## Introduction

Forced or compulsory labour, human trafficking and other forms of slavery represent some of the most serious forms of human rights abuse in any society. We all have a responsibility to be alert to the risks, however small, in both our business and our wider supply chain. Our colleagues are expected to report concerns and management are expected to act upon them.

We do not support or knowingly deal with any person or business involved in slavery or human trafficking. The use of exploitative labour and human trafficking is a criminal offence and is prohibited within our business and supply chains.

## Our business and supply chains

We connect a global community of informed travel customers and expert, caring travel advisers, who specialise in creating personalised travel experiences for consumers and businesses. Entrepreneurs use our brand, tools, technology, supply chain and support to establish and grow their businesses, trading as Travel Counsellor franchisees (each known as a 'Travel Counsellor').

The majority of our business is operated from the United Kingdom, with additional operations through subsidiaries in the Netherlands, Belgium, Ireland, UAE, South Africa and Canada.

We operate both as a travel agent and tour operator. When a Travel Counsellor sells travel services, we often act as agent for third-party providers, facilitating contracts between customers and those third-party providers. We also act as a tour operator, organising tailor-made holiday packages. Where we act as a package organiser under the Package Travel and Linked Travel Arrangements 2018, we are responsible for ensuring the holiday package is properly performed by the travel suppliers.

Our supply chain is global and includes both direct and indirect contracts with travel suppliers. We work with partners who share our values and we endeavour to use our relationships across the world to improve compliance, quality and ethical trading standards.

We recognise that certain parts of the travel sector and certain geographic regions may present higher inherent risks of labour exploitation, particularly where services are delivered through complex or extended supply chains or in jurisdictions with lower labour enforcement standards.

We also engage suppliers that support our operational activities, including technology providers. These suppliers tend to be located closer to our main operational trading business and primarily support the group head office in the UK.

## Our policies

We are committed to acting with honesty, integrity and transparency in all our business dealings and do not tolerate any form of slavery or human trafficking within our organisation or within the supply chains.

We maintain a framework of policies and expected behaviours designed to support this commitment. These include our Code of Ethics, which sets out our values and standards of conduct, including our commitment to human rights and the prevention of modern slavery. Our Speak Up Policy encourages colleagues and Travel Counsellors to raise concerns about suspected wrongdoing at the earliest opportunity, with reassurance that they may do so without fear of retaliation, even if concerns are later unsubstantiated. We also provide an independent and confidential whistleblowing hotline, including the option for anonymous reporting.

We additionally maintain anti-bribery and corruption policies, as well as recruitment procedures designed to verify eligibility to work legally in the UK

## **Supplier compliance**

We have a Supplier Code of Conduct which sets out the minimum standards we expect of suppliers. This includes compliance with the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and a commitment to take appropriate steps to ensure that operations are free from slavery, servitude, forced and compulsory labour, and human trafficking.

Our supplier contracts include provisions relating to modern slavery and human trafficking compliance.

We use contractual controls and supplier onboarding processes to support our management of suppliers. We also take into account risk factors identified through supplier due diligence and review processes to help inform our ongoing approach to supply chain management.

We will take appropriate action where suppliers fail to meet our expected standards, which may include requiring the implementation of corrective actions and/or suspension or cessation of bookings. Where we identify concerns relating to modern slavery, we will assess the circumstances and take appropriate action, which may include suspension or termination of the supplier relationship. We do not knowingly conduct business with any supplier engaged in modern slavery practices.

## **Risk assessment and management**

We recognise that modern slavery risks can arise within complex global supply chains and we take a risk-based approach to identifying and managing these risks.

We use supplier due diligence processes and screening tools to support our risk assessment. These tools help to identify potential risk indicators, which may include adverse media, sanctions exposure and publicly available regulatory enforcement information.

Where higher-risk indicators are identified, we may undertake further review and, where appropriate, engage with the supplier to seek clarification or to better understand the risk identified. Where concerns cannot be satisfactorily addressed, we may take appropriate action, which can include suspension or termination of the supplier relationship.

We encourage a culture of openness and accountability. Through our Speak Up Policy, colleagues and Travel Counsellors are able to report concerns relating to modern slavery or related unethical practices without fear of retaliation. Reports may be submitted anonymously and are reviewed in accordance with our internal procedures.

## **Training**

We provide training to employees and Travel Counsellors on compliance matters, including modern slavery. The training includes guidance on the identification of potential modern slavery risks and the reporting of concerns. Completion of training is tracked to support oversight.

## **Monitoring and effectiveness**

We are continuing to strengthen our approach to preventing modern slavery.

Our use of risk-based tools, combined with accessible reporting channels such as our Speak Up Policy, ensures that we can adapt to evolving risks and maintain high ethical standards across our operations and supply chain.

We are considering the development of key performance indicators to help assess the effectiveness of our modern slavery controls. At present, our focus remains on strengthening our supplier due diligence processes and risk monitoring capabilities.

### **Approval of this statement**

This statement has been approved by the board of directors of Travel Counsellors Limited (the UK trading entity of the Travel Counsellors group of companies) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ended 31 October 2025.

#### **Steve Byrne**

Chief Executive Officer

Dated 30 April 2026