

# Modern Slavery Act Statement

## Introduction

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest 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 in our wider supply chain. Our colleagues are expected to report concerns and management are expected to act upon them.

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

## 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, but we also operate through subsidiaries in the Netherlands, Belgium, Ireland, UAE and South Africa.

We operate as both a travel agent and tour operator. When a Travel Counsellor sells travel services, we will often act as agent for the third-party providers of those travel services and facilitate customers contracting directly with those third-party providers. We also act as tour operator, organising our own tailor-made holiday packages. Where we act as a package organiser for the purposes for the Package Travel and Linked Travel Arrangements 2018, we have an obligation to ensure the holiday package is properly performed by the travel suppliers.

Our supply chain is global and includes 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 also have a supply chain focused on providing services that support our day-to-day operations, for example, 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 worldwide, and do not tolerate any form of slavery or human trafficking in our organisation or within the supply chains.

We have a clear framework of rules and behaviours and encourage the reporting of any concerns or breaches so that they can be dealt with appropriately in accordance with our policies and procedures. Our supporting policies include our speak up policy, where colleagues are encouraged to raise concerns about any suspected wrongdoing treatment or practice within our business and supply chain at the earliest practical stage and we seek to reassure colleagues they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken. We offer an independent and confidential whistleblowing hotline where colleagues can raise concerns confidentially and anonymously if they wish.

We also have anti-bribery and corruption policies and procedures which give guidance on identifying, reporting and countering bribery and corruption and appropriate recruitment policy and procedures, including verification of eligibility to work legally in the UK.

## **Supplier Compliance**

We have a supplier Code of Conduct which sets out the minimum standards we expect from our suppliers, including complying with the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and a commitment to take necessary steps to ensure that their operations are free from slavery, servitude, forced and compulsory labour and human trafficking. We are in the process of updating our supplier Code of Conduct, which we will embed in the year ahead. As well as the Code of Conduct, we enter into agreements with appropriate terms covering slavery and human trafficking.

Colleagues use our contracts, supplier process and H&S systems to monitor our suppliers. Based on a number of factors, including supplier reviews and feedback, we consider how to refine and improve our supply chain management. As part of this, we focus on particular areas of concern and/or identify recommendations for improvement in order to drive and maintain high standards.

We are enhancing our supplier onboarding process to expand on our existing supplier checks. As part of this, we have partnered with a third party to carry out supplier screening, which checks against adverse news coverage, sanctions screenings, and politically exposed persons (PEPs) screening.

We will take appropriate action where we identify suppliers who fail to uphold the high standards we expect of them which may include requiring implementation of corrective actions and/or suspension or cessation of bookings. If we ever become aware of any instances of modern slavery, we would cease our relationship with the supplier concerned immediately and we will never knowingly conduct business with anyone engaged in modern slavery practices.

We recognise that in dealing with the global travel sector, there will be areas that carry greater risks in relation to slavery and human trafficking. Our objective is to build relationships with suitable partners who share our values and leverage their quality and compliance capabilities to increase the reach of our influence into the wider travel market. We believe that this will have the greatest impact given the volume of global travel providers that each Travel Counsellors has access to through the platform we provide.

## **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 2023.



**Steve Byrne**

Chief Executive Officer

Dated: 2 April 2024