

Audley Travel Group Modern Slavery Statement

We are deeply passionate about the places we travel to and ensuring that our customers' trips have a positive impact on the destinations they visit. We are committed to respecting and supporting human rights throughout our operations. We firmly adhere to the principles of ethical travel as set out in our Responsible Travel Policy (www.audleytravel.com/about-us/responsible-travel) and as reflected in the conduct of our business dealings and relationships with our business partners. In accordance with the Modern Slavery Act 2015, we are committed to taking steps to ensure that slavery and human trafficking does not occur within our business or that of our partners and, despite the significant disruption caused to our business by the Covid-19 pandemic, we have upheld our commitments as shown by the steps below.

THE AUDLEY TRAVEL GROUP

We provide bespoke tailor-made travel experiences for our customers and work with organisations across the world to do this. The Audley Travel Group includes: both our UK and US trading businesses (Audley Travel Group Limited and Audley Travel US, Inc.); Audley Travel Services Limited; as well as Boketto Holdco Limited, Boketto Midco Limited, Boketto Midco 2 Limited, Boketto Newco Limited and Boketto Bidco Limited, which are parent companies of the main trading businesses.

DUE DILIGENCE IN OUR BUSINESS AND SUPPLY CHAINS

We have offices in London, Witney and Boston and around 613 employees worldwide. We are passionate about fairness, equality and inclusion and place explicit positive value on our employees' points of difference. We also apply high standards in the recruitment and employment of our people, which includes a focus on an individual's right to work in the relevant country in which they will be engaged.

In order to give our customers the very best experience, we have partnerships with local suppliers across the world so our customers can benefit from truly local knowledge. We work with suppliers of: travel services, transport (including airlines), accommodation, IT and other office facilities and communication equipment and professional services such as legal advisers, insurers and auditors.

In recognition of our extensive product supply chain, we have a designated Product team who oversee this and is responsible for selecting and managing our relationships with the very best local suppliers. We have clear and detailed guidelines in place for tenders in relation to modern slavery and human trafficking and, compliance with the Modern Slavery Act, is a requirement in our ground handler agreements. In 2020, we made improvements to our ground handler agreements and introduced a new supplier code of conduct for land suppliers, which are both being rolled out this year. The code of conduct sets out our expectations of our local land suppliers, including obligations to ensure that no forced or child labour is taking place in their business; that their processes ensure all workers are legally permitted to work; and that their employees are paid at least the legal minimum wage. We also ask our ground handlers to place the same obligations on subcontractors they work with. In addition, we have the ability to audit our ground handlers' adherence to the Modern Slavery Act and ethical practices and have the ability to take action if terms have been breached.

In January 2020, we were granted the Travelife Partner award, which recognises our commitment to corporate social responsibility.

In early 2021 we launched our Environmental Social and Governance ("ESG") Framework, which demonstrates our commitment to sustainability by focussing on five key areas: community; environment, marketplace, workplace and governance. For each of these areas, we have set goals that either align with the UN Sustainable Development Goals or with our own commitments to ensure that each year we make a positive impact internally within our business and externally with suppliers and communities. Specifically, our Human Rights goal, focuses on our commitment to reduce the risk of our activities harming the rights of others and taking the necessary steps to avert, mitigate or remedy potential, actual or perceived abuses. Our ESG Framework and related commitments were approved by the board of Boketto Holdco Ltd who continue to have oversight throughout the year.

OUR TRAINING AND POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have reviewed and updated our Global Anti-Slavery and Human Trafficking Policy, which applies to all global employees, with certain sections sign-posted for our suppliers. This policy reflects our commitment to acting ethically and with integrity and to support this further, we have created an online training module on the Modern Slavery Act which all of our employees are required to complete. Using this online training module will make training more accessible to our employees and allows us to better monitor compliance.

We also have an internal whistleblowing procedure in place (which we updated this year) for any employees who wish to confidentially raise or discuss any concerns they have regarding the issues covered by the Modern Slavery Policy. The confidential helpline is provided by an independent third party.

¹ For Financial Year ending 31 December 2020

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- the number of our employees trained on human rights, modern slavery and human trafficking;
- the number of modern slavery cases reported under our whistleblowing procedure or otherwise; and
- the number of supplier audits carried out.
- the percentage of our GHA which have existed for over 5 years.

As part of our commitment to delivering best practice in this area we have also published our Modern Slavery Act statement on the Government registry (<https://modern-slavery-statement-registry.service.gov.uk>)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that the Audley Travel Group has taken during the financial year ending 31 December 2020 to prevent modern slavery and human trafficking in its business operations and supply chains.

The Directors of the Audley Travel Group companies approved this statement on 26 May 2021. SIGNATURE OF

DIRECTOR



NICK LONGMAN

CEO, Audley Travel Group

Date: 26 May 2021
