

Modern Slavery Act Statement

Approved by the Directors on 17th April 2019

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

We connect a global community of informed travel consumers and expert, caring travel advisers, who specialise in creating personalised travel experiences. 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').

Our main business (Travel Counsellors Limited) and headquarters are located in Manchester, UK. We also operate through subsidiaries in the Netherlands, Belgium, Ireland, UAE, South Africa and Australia.

Our Supply Chains

In the majority of cases when a Travel Counsellor sells travel services and travel packages, we act as agent for third party providers of those travel services and ancillary products/services. Whilst not falling within our supply chain, we endeavour to use our relationships across the world to improve compliance, quality and ethical trading standards. In many instances our relationship is not direct with the ultimate travel provider as we use reputable third party 'aggregators' who contract with numerous third-party providers and then provide travel content into our systems.

However, we also act as principal where a Travel Counsellor sells tailor-made package travel to customers. As a result, our supply chain includes travel providers with whom we have direct agreements, including for example hotels. Given the nature of our business, the supply chain is global and is driven by customer demand and as such we use risk assessments to focus our compliance activity.

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. We assess and monitor supplier compliance during our procurement process and on an on-going basis.

Our policy on slavery and human trafficking and the Modern Slavery Act 2015

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 expect the same high standards from all our suppliers, contractors and business partners.

Supplier Compliance

Colleagues use our contracts, new supplier process and H&S and other compliance assessments to monitor our suppliers. Based on a number of factors, including supplier reviews and feedback from supplier assessments, 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. This supplier management covers a range of compliance and quality issues including slavery and human trafficking. 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.

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.

Responsibilities for policy compliance

The Directors are ultimately responsible for the overall compliance of our legal and ethical obligations under the Act but compliance with the Act is the responsibility of all colleagues, persons or organisations working for or on behalf of the Company. Our commercial and operational teams are primarily responsible for managing our travel-related supply chain.

Our franchisees are obliged through their franchise agreements to operate in accordance with applicable laws.

Reporting of suspected policy breaches

All colleagues and our franchisees are encouraged to report any concerns they may have in relation to slavery and human trafficking.

This statement is made by Travel Counsellors Limited 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 2019. Travel Counsellors Limited is the UK trading entity of the Travel Counsellors group of companies.



Steve Byrne
Chief Executive Officer
Travel Counsellors
Dated: 17th April 2019