

Audley Travel Group Modern Slavery Statement¹

We are deeply passionate about the places we travel to and ensuring that the visits of our customers have a positive effect on those destinations. 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. We are committed to taking steps to ensure that slavery and human trafficking does not occur within our business or partners in accordance with the Modern Slavery Act 2015.

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.) as well as Boketto Holdco Limited, Boketto Midco 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 850 employees worldwide. We are passionate about fairness, equality and inclusion and apply high standards in the recruitment and employment of our employees. We also take clear steps to ensure that we operate our offices in a socially responsible way.

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 are 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 supplier agreements. We also ask our suppliers to place the same obligations on subcontractors they work with. In addition, we have the ability to audit our suppliers' adherence to the Modern Slavery Act and ethical travel which we undertake as part of our regular Health and Safety audits.

OUR TRAINING AND POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have implemented training on the Modern Slavery Act to employees and an internal policy applies to all global employees reflecting our commitment to acting ethically and with integrity. We also have an internal whistleblowing procedure in place for any employees who wish to confidentially raise or discuss any concerns they have regarding the issues covered by the Modern Slavery Policy.

¹ For Financial Year ending 31 December 2018

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.

As part of our commitment to delivering best practice in this area we have also published our Modern Slavery Act statement on the TISCreport.org and modernslaveryregistry.org websites.

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 2018 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 30 April 2019

SIGNATURE OF DIRECTOR



NICK LONGMAN

CEO, Audley Travel Group

Date: 30 April 2019