



SECRET ESCAPES LIMITED

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

As a global business offering members the opportunity to benefit from all the world has to offer, we know how important it is that everyone, wherever they are based, is treated with dignity and respect. We are particularly aware of the damage that the exploitation of workers can have and are committed to striving to ensure that modern slavery and human trafficking plays no part in our business or supply chain.

We strive to ensure that the way we run our business deters any form of modern slavery and human trafficking from occurring in our business. As part of this we work to make sure that the way we work and contract with our partners counteracts the risk wherever possible and that we maintain a working environment and ethos that adheres to the highest standards of business practice.

In addition to publishing our modern slavery statement on our website, we will add this to the Home Office modern slavery statement registry.

Our organisational structure and our business

Secret Escapes is an exclusive members only travel club offering our members huge discounts and great deals on hand-picked luxury hotels and holidays.

We offer members the opportunity to book a stay at hand-picked hotels with which we have partnered, book package holidays including flights and hotels, and bespoke dynamic packages.

Secret Escapes is headquartered in London, UK. We also have trading companies and offices throughout Europe.

Our staff

We would not be able to deliver our services without the commitment and support of our hardworking and dedicated staff. They are integral to the success of Secret Escapes and we recognise the importance of creating a fair and equal environment in which to work. To achieve this we ensure that our recruitment practices and procedures comply with the relevant local regulations and standards and we embed core principles such as integrity, honesty and fairness into the business.

Throughout the employment relationship we also strive to ensure that we take a fair and equal approach to recruiting talent and ensure that no employee is subject to discrimination on any protected ground.

In addition to our directly engaged staff, we also outsource some important services to our trusted partners. We ensure that where staff are engaged through third party organisations, there are clear obligations on those organisations to adhere to all legal obligations in respect of those individuals.

Our supply chains

Part of our business is involved in connecting our members with hand-picked hotels and travel providers. In that way, we act as an intermediary for such suppliers, providing an online platform for our members to book their chosen rooms or holiday.

To offer the great deals and packages to our members we also receive services from tour operators, destination management companies, hotels (or their operators,) flight operators, flight aggregators and marketing partners. Our supply chain in engaging with these partners is relatively short and integrated. We nonetheless recognise the risks which our work in some of these industries and geographies can create, so remain vigilant to the risk of malpractice and work hard, through due diligence and practical management to reduce risks wherever possible.

Due diligence

It is a key part of the way we work that we want our contractors, suppliers and other business partners to uphold the same high standards as we do. This is particularly in relation to ensuring that all employees and workers are treated with dignity and respect in a fair and ethical environment.

We work hard to ensure that we are partnering with organisations that uphold the appropriate standards and attitudes towards staff engagement and treatment. In that respect our due diligence processes seek to identify, assess, and monitor any potential areas of risk in relation to our business and supply chains. This includes considering the type of services being carried out, the nature of what is being supplied and the location from where it is being supplied. We will continue to look to manage any risks identified and work with our suppliers to uphold ethical standards.

Assessing and managing risk

As a global business our business relationships are worldwide. We recognise that the risk of modern slavery and human trafficking is higher in certain jurisdictions, but we work hard to ensure that the requisite standards are met wherever in the world our partners and suppliers are based.

In contracting with hotels, tour operators, destination management companies, flight operators, flight aggregators and marketing partners we strive always to build relationships so that they understand the importance we attribute to maintaining standards and an approach to business and operations which reflects our own. In that respect we ensure we meet directly (whether in person or virtually) with the destination management companies with which we contract. We also carry out periodic checks of a number of our partner hotels across the world. In addition, we ensure that suppliers enter into standard contractual terms which require their compliance with all laws, including in their engagement and treatment of their own workforce.

Our policies which relate to the Modern Slavery Act 2015

The following policies are available to all staff through the Secret Escapes internal systems:

- Modern Slavery and Human Trafficking
- Whistleblowing
- Disciplinary
- Grievance
- Equality and Diversity Policy

These policies set out the standards required of our staff and include details of the mechanisms in place which can be used to report issues or concerns about modern slavery taking place that is linked to our organisation.

Training

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values.

We recognise that this is a complex area, and no one-size-fits-all approach is appropriate so we endeavour to keep staff involved in the procurement part of the business informed to ensure that our practices continue to be appropriate to the way we work.

We have identified training material we would like to roll out for all new and existing employees. We know that identifying potential and actual cases of modern slavery requires upskilling colleagues to understand the drivers and indicators of modern slavery.

Outcomes from our 2025 review

In the past year, we have:

1. Ensured clear escalation communication channels are available to all employees and that employees are aware of these through any training rolled out;
2. Maintained ongoing monitoring of our Anti-Bribery and Corruption Policy and annual training;
3. Reviewed our Whistleblowing Policy to ensure clear escalation communication channels are available to all employees and that employees are aware of these through the ongoing training.

Looking ahead

In 2026 we'll seek to:

1. identify any areas for improvement and/or focus; produce a mitigation action list with regard to those areas;
2. further develop our ESG strategy; and
3. continue developing a compliance framework with a view to monitoring on-going compliance and risk.

Key initial actions that have been identified are as follows:

1. continue developing our code of conduct;
2. commence further refinements to Whistleblowing Policy to implement effective reporting structure and governance;
3. developing our "Supplier Minimum Standards" guidance to ensure consistent health and safety and ethical requirements across all supplier types;
4. ensuring that our training cycles and due diligence tools (such as GBG sanctions screening) remain effective and aligned with operational changes;
5. roll out modern slavery and human trafficking training, policy acknowledgement and compliance reporting to our employees; and
6. build upon the existing contractual obligations with our suppliers to encourage compliance through their own supply chains and identify any areas for improvement.

We will provide an update on our progress on the above in our Modern Slavery Act Transparency Statement for the financial year ending 31 December 2026.

This statement is given on behalf of Secret Escapes Limited for the financial year ending 31 December 2025. It sets out the steps taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.


S A Saint (Sep 16, 2026 16:10:36 GMT+1)

.....
Alex Saint
Director

Approved and signed off by the Board of Directors of Secret Escapes Limited on

21/09/2026... (DD/MM/YYYY)