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 Travel the Right Way policy 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 have upheld our commitment 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: Audley Travel Group Limited; Audley Travel US, Inc; Audley Travel Services Limited; Boketto Holdco Limited; Boketto Midco Limited; Boketto Midco 2 Limited; Boketto Midco 3 Limited; Boketto Newco Limited; and Boketto Bidco Limited.

Due diligence in our business and supply chain

We have offices in London, Witney and Boston, and around 850 employees worldwide. We are passionate about fairness, equality and inclusion and place explicit positive value on our employees' points of difference. As part of our commitment to this, in April 2022 we introduced Unify, our global Diversity, Equity and Inclusion (DE&I) group, which will gather employee feedback and help guide the business towards delivering its DE&I objectives. 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 for our customers to benefit from truly local knowledge and have the very best experience, we have partnerships with suppliers across the world who provide travel services, transport (including cruises and airlines), and accommodation. We also partner with suppliers of 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 specialist regional product teams based in our offices, 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 land supplier contracts. In 2020, we made improvements to our standard ground handler contracts, which are accompanied by a Supplier Code of Conduct, and these continue to be rolled out.

The Supplier 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 are able to take action if terms have been breached. In January 2020, we were granted Travelife Partner status, which recognises our commitment to corporate social responsibility.

In early 2021 we launched our Environmental Social and Governance (ESG) Framework, which further demonstrates our commitment to sustainability by focusing 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. Progress made against our commitments can be viewed by visiting the Policies page of our website.

In 2022, we committed to creating a modern slavery policy template, which will aid our third-party suppliers with the creation of their own. Work is also underway to launch an online Supplier Resource Centre, ensuring that all compliance-related policies, along with any associated training resources, are readily accessible for suppliers.

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 suppliers. The amendments were approved by the Board in April 2023. This policy reflects our commitment to acting ethically and with integrity and to support this further, we created an online training module in 2021 on the Modern Slavery Act which all of our employees are required to complete. Having this online training module makes training more accessible to our employees and allows us to better monitor compliance. As with the policy, the content of this continues to be reviewed, and updated if necessary, on an annual basis.

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. The confidential helpline is provided by an independent third party.

Our effectiveness in combatting slavery and human trafficking

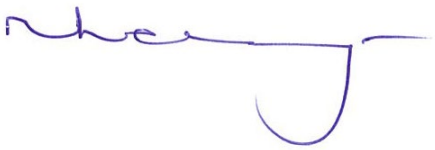
We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chain:

- 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;
- The number of supplier audits carried out; and
- The percentage of our GHA relationships which have existed for over five years.

As part of our commitment to delivering best practice in this area we have also published our Modern Slavery Act statement on the UK government's registry.

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 2022 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 25 May 2023.



Nick Longman
CEO, Audley Travel Group
Date: 25 May 2023