

Audley Travel Group

Modern Slavery Statement 1st January 2025 – 31 December 2025

Introduction

This statement, made pursuant to Section 54 (1) of the Modern Slavery Act 2015, outlines the measures undertaken by the Audley Travel Group (as defined below) during the financial year ending 31 December 2025 to combat modern slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. As defined under the Modern Slavery Act 2015, modern slavery encompasses "slavery, servitude, forced or compulsory labour, and human trafficking," all of which involve controlling individuals in a way that strips them of their autonomy and dignity.

We are committed to the destinations we travel to and ensuring that our customers' trips positively contribute to the communities they visit. Guided by our [Sustainability Policy](#) and ESG framework, as detailed in our [Responsible Travel and Sustainability Report](#), we have made a commitment to protecting human rights across all of our operations and partnerships. Our B Corp accreditation, together with our Travelife Partner status, recognises our commitment to operating responsibly.

Organisational Structure and Business Operations

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.

We have offices in the UK (Witney and London) and the USA (Boston) and have around 970 employees worldwide.

Supply Chain

We collaborate with an extensive network of global suppliers to deliver high-quality travel experiences. These suppliers provide essential services, including transport (including cruise and airlines), accommodation, excursions, IT systems, office facilities, and professional advisory services.

The Supplier Code of Conduct sets out our expectations of our suppliers, including obligations to ensure that no forced or child labour is taking place in their business, that they follow lawful and transparent employment practices, and guarantee at least the legal minimum wage. We ask our Ground Handlers to place the same obligations on the subcontractors they work with. We retain the ability to audit suppliers and take corrective action where necessary, ensuring compliance with the Modern Slavery Act and ethical practices. Our Ground Handler contracts include clauses outlining Audley's expectations in relation to adherence to the Modern Slavery Act.

Policies on Modern Slavery & Human Trafficking

We have implemented a comprehensive framework of policies to prevent modern slavery from occurring within our business and to uphold ethical practices throughout our operations and supply chains.

Relevant Policies:

- **Global Anti-Slavery and Human Trafficking Policy** - Sets out Audley's zero-tolerance stance on modern slavery, human trafficking, and forced labour. It defines modern slavery, outlines the company's approach to identifying risks, and explains the steps taken to protect both employees and suppliers.
- **Human Rights Policy** – Articulates Audley's commitment to upholding internationally recognised human rights across its operations and supply chain, aligned with the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.
- **Anti-Bribery and Corruption Policy** - This policy complements modern slavery measures by promoting transparency and ethical behaviour across all business dealings.
- **Equal Opportunities Policy** - Supports fair and ethical employment practices by promoting non-discriminatory hiring and safeguarding against exploitative recruitment methods.
- **Anti-harassment, Bullying, & Sexual Harassment Policy** – Outlines Audley's commitment to providing a safe and respectful environment for all employees, contractors, clients and visitors.
- **Whistleblower Policy** - Provides a secure and confidential mechanism for employees to report any concerns or suspected breaches related to modern slavery and other unethical practices without fear of retribution.
- **Diversity, Equity & Inclusion Policy** - Fosters an inclusive workplace where all individuals are valued, respected, and empowered.
- **Supplier Code of Conduct** - Establishes expectations for product and suppliers regarding ethical labour practices, explicitly prohibiting forced labour, exploitation, and human trafficking.
- **Child Welfare Policy** - Audley Travel follows international guidelines set out by Friends International and the United Nations when considering interactions with children in-destination.

Risk Assessment and Due Diligence

We adopt a risk-based approach to assessing and managing supplier compliance, with an awareness of risks being highlighted through periodic review of the Corruption Perceptions Index and the Global Slavery Index.

We are committed to fostering fairness and inclusion, ensuring ethical employment practices and responsible business operations. Some of the key processes supporting this include:

Diversity, Equity and Inclusion (DE&I) initiative

In 2022, we launched the Diversity, Equity, and Inclusion (DE&I) initiative, Unify, to strengthen employee engagement and advance our DE&I goals.

Recruitment and Right to Work Checks

We are committed to ensuring ethical employment practices and safeguarding against human trafficking and forced labour. We conduct right to work checks for all new employees as part of our due diligence process.

Tender Process

Our key land suppliers go through a robust tender process. This includes an assessment of their approach to preventing modern slavery and human trafficking in their operations and supply chains.

Supplier Contracting

Our land supplier contract templates include clauses requiring our direct suppliers to comply with the obligations of the Modern Slavery Act 2015 and to take steps to ensure that their sub-contractors also comply.

Supplier Code of Conduct

We set out clear expectations for supplier behaviour through our Supplier Code of Conduct, which requires adherence to ethical business practices. Suppliers are expected to take proactive steps to prevent modern slavery within their operations and supply chains.

Supplier Auditing and Compliance Checks

During 2025, we followed through on our initial Ground Handling Agent auditing pilot by reviewing and updating our in-house audit questionnaire. As part of this audit, GHAs are asked about the measures they have in place to prevent human trafficking and modern slavery within their business and supply chains. The questionnaire was issued to a further small group of key GHAs, with 100% response rate from all those engaged. The information provided helps us to improve visibility of supplier practices and identify where additional guidance or support may be appropriate. We intend to continue this activity during 2026 as part of our ongoing approach to managing modern slavery risks within our supply chain.

Sanctions Screening and Risk Intelligence

We conduct supplier screening and compliance checks as part of onboarding, tender evaluations, and ad-hoc reviews. This includes screening against World-Check One, a global risk intelligence tool that provides insights into:

- Adverse media reports related to unethical practices.
- Sanctions and regulatory enforcements against suppliers.
- Other relevant risk indicators within our supply chain.

Key Performance Indicators

We use the following KPIs to assess the effectiveness of our efforts in preventing slavery and human trafficking within our business and supply chain.

- **Employee Training:** The number of employees trained on modern slavery and human trafficking, ensuring awareness and accountability across our organisation.

- **Whistleblowing and Reporting:** The number of modern slavery cases reported through our whistleblowing procedure or other reporting mechanisms, helping us track and respond to potential risks.
- **Ground Handling Agent (GHA) Relationships:** The percentage of long-standing relationships with GHAs that have existed for over five years, reflecting stability and trust in our supplier partnerships.


Key Achievements to Date

- 2020:
 - Enhanced Ground Handling Agent contracts were drawn up. These have been rolled out accompanied by a Supplier Code of Conduct.
 - Granted Travelife Partner status, meeting more than 100 sustainability criteria
- 2021:
 - Introduced the Child Welfare Policy, outlining ethical guidelines for interactions with children during trips.
- 2022:
 - Established Unify, a global Diversity, Equity, and Inclusion (DE&I) network of employees and leaders across three offices and homeworker pools.
- 2023:
 - Achieved B Corporation certification, emphasizing commitment to verified standards of social and environmental performance, transparency, and accountability.
 - Created the Supplier Resource Centre, an accessible online hub housing a range of resources, including compliance-related policies, training materials, and a modern slavery policy template for suppliers.
- 2024:
 - Introduced a trial in-house auditing process for key ground handling agents to assess anti-slavery measures within suppliers' operations and supply chains.
 - Developed a DE&I calendar through Unify, highlighting initiatives to foster inclusion and equity across the business, further embedding ESG principles into daily operations.
 - Expanded the Child Welfare Policy, aligning with guidelines from the Childsafe Movement, Friends International, the United Nations, and travel industry stakeholders.
- 2025:
 - Reviewed and updated the in-house supplier audit questionnaire, rolling out to a further small group of suppliers, achieving 100% response rate.
 - Expanded and re-communicated the Supplier Resource Centre, adding further resources to support supplier understanding of our business expectations.
 - Introduced a standalone Human Rights Policy, formalising Audley's commitment to respecting and promoting internationally recognised human rights across its operations, supply chain, and communities within its scope of influence.

Approval

This statement has been approved by the Directors of each of the entities within the Audley Travel Group on 29 April 2026. It reflects the organisation's commitment to combating modern slavery and human trafficking within its operations and supply chains.

The Audley Travel Group is dedicated to transparency and accountability. This statement is published on the organisation's website and has been submitted to the UK Government's [Modern Slavery Statement Registry](#), ensuring public access and compliance with Section 54 of the Modern Slavery Act 2015.

A handwritten signature in cursive script, appearing to read 'R Hodgson', is displayed on a light-colored rectangular background.

Richard Hodgson
CEO, Audley Travel Group

Date: 29 April 2026