

# Modern Slavery Policy

Slavery and human trafficking are heinous crimes that affect communities and individuals across the globe which is why we all are required to be alert to the risks in our business and in our wider supply chain. Modern Slavery is a term used to encompass both offences included in the Modern Slavery Act 2015, namely holding a person in slavery or servitude or requiring forced or compulsory labour and arranging human trafficking. It is a crime that results in an abuse of human rights and can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. All staff are expected to report concerns and management are expected to act upon those concerns. Company expects high standards not only from its employees, but also from its suppliers and any other business partners.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year 2023/2024.

We are a privately owned limited company that provides retail travel agency and tour operator services. We employ over 400 staff across two sites and around 250 staff working from home.

## Our Supply Chains

Our supply chain includes the sourcing of cruises, holidays (including flights and hotels), tours and excursions principally related to the provision of holidays.

## Our Policies

The Company has a zero tolerance approach to modern slavery and are committed to ensuring that there is no slavery or human trafficking in any part of our business or in our supply chains. Our policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and maintaining effective systems and controls to ensure slavery and human trafficking is not taking place anywhere either within our business or in our supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company accepts that it has a responsibility through its due diligence.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

1. Dignity at Work Policy – we have this policy in place to make sure our staff are protected from poor treatment which comply with all regulations. These include development opportunities, training, fair recruitment and fair terms and conditions of employment along with access to employment related benefits and facilities.
2. Whistleblowing Policy – we have also whistleblowing policy in place so that all employees are aware of the possibility and duty to raise any concerns in regards to any criminal offence, miscarriage of justice, a danger to health and safety of any individual or an attempt to conceal any information on any of the above without fear of reprisals.

## Due Diligence Processes

Most recently in 2022 we conducted a re-review of all of our suppliers to ensure they had up to date, published statements. We intend to create an

annual audit process around this to see this checked on a regular basis.

To identify and mitigate risk within our business we have in place:

- Whistleblowing Policy
- Dignity at Work Policy
- Report any concerns via [Modern Slavery Website](#)
- Report any concerns via helpline 08000 121 700

## **Risk Assessment and Management**

The key areas of our organisation's activities at higher risk are highly complex supply chains operating across national borders and jurisdictions, with the implication that the labour force used in these processes is not fully visible to Iglu.com Limited. Any workforce involved in this process, such as hotel staff, ground handlers, excursion providers, excursion venues, transport providers, airport staff, airline crew, resort staff, restaurants, bars, craft venues, entertainment providers, crew on board ships, staff recruitment agencies could potentially be exploited, or be high risk in relation to slavery or human trafficking, thus failing to meet one or more areas of policy and so not being compliant with the Modern Slavery Act of 2015.

After due consideration, we have not identified any significant risks of modern slavery, forced labour or human trafficking in our business nor supply chain. However, we continue to be alert to any potential of the problems.

## **Training**

Relevant employees are aware of the Modern Slavery Act of 2015 and have identified what good examples of statements should include to make sure all checks in place with suppliers are carried out to the best of our ability.

Signed,

David Gooch

Chief Executive Officer

Iglu.com Limited

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