Modern Slavery & Human Trafficking Statement for Financial Year ended 31 October 2019

This statement has been approved by the board of directors of Want2BThere Limited on 28 January 2020 and is published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Want2BThere Limited, its operating subsidiary We Love Holidays Limited and other relevant group companies (together "loveholidays") to prevent modern slavery and human trafficking in its business and supply chains and covers the financial year from 1 November 2018 to 31 October 2019.

Introduction

loveholidays is one of the fastest growing online travel agencies in the UK and is ranked one of the top 10 ATOL holders by the Civil Aviation Authority.

At loveholidays we believe we have a responsibility to ensure that our business is conducted responsibly and in an ethical manner. We do not tolerate any form of slavery, servitude, human trafficking and/or child or forced labour within our organisation or partner organisations. We are committed to continuously improving our policies, standards and practices to combat abuses of a person's basic freedom and rights and taking steps to ensure that modern slavery, child or forced labour and/or human trafficking do not take place in any part of our business or our supply chain.

Structure and Business Model

Our operating group consists of Want2Bthere Limited and our trading companies We Love Holidays Limited and We Love Holidays LLC.

As an online travel agent, we provide a service which enables customers to quickly and easily book travel services with various third-party providers such as airlines, hotels and airport transfer providers (**"Service Providers"**). Customers book through our websites or with our home-based sales network over the phone. We operate our own websites under the loveholidays brand in the UK, Ireland, Finland, Sweden, Norway and Denmark and in the US (under the lovevacations.com brand) and also offer hotel only online booking services in France, Spain, Germany, Italy, Belgium, Portugal, the Netherlands, Australia and New Zealand through arrangements with a range of third party operated platforms. In the financial year ended 31 October 2019, we served over 2 million customers across these jurisdictions.

Our headquarters are in Hammersmith, London and we have another site in Lancing, Sussex. As at 31 October 2019, our most recent financial year end, loveholidays employed 278 employees across its two sites as well as engaging a number of independent contractors (both in the UK and overseas) and a network of independent homeworker sales agents.

loveholidays acts as an agent in the booking process, facilitating customers contracting directly with their chosen Service Provider. When booking flights, we act as the agent for the consumer, unless we have an agency agreement in place with the airline. For hotel and transfer bookings, the Service Providers have appointed loveholidays to act on their behalf to offer customers their respective services. The customer therefore always has a contract directly with the Service Provider for the relevant individual travel service. Where loveholidays acts as agent in respect of holiday bookings which satisfy the meaning of "Package" for the purposes of the Package Travel and Linked Travel Arrangements Regulations 2018, loveholidays acts as a "package organiser" and has legal obligations to ensure that the package holiday is properly performed by the Service Providers the customer has contracted with.

We have built close relationships with our key partners and ensure that expectations of business behaviour are clear and consistent with our ethical trading aims.

Our Supply Chain

Our supply chain includes direct and indirect contracts with certain Service Providers and contracts regarding services which support the operation of our business (including marketing, IT, software, human resources, agency, credit card processing and professional advisory services). The Service Providers and providers of ancillary services that are involved in such supply chain are located in the UK and globally.

Risk Assessment

We have assessed that the biggest risk of slavery and human trafficking is within the flight, accomodation and transfer services provided by the Service Providers to customers and within the ancillary supporting services provided to Service Providers by third parties (such as the provision of cleaning and other support agency workers, laundry facilities and in the manufacture of good used by accomodation providers).

loveholidays acts as an agent and as such, Service Providers provide their services directly to customers and not to loveholidays. However, as an ethical business, as far as possible we ensure that Service Providers are contractually obliged to comply with all applicable legal and regulatory obligations, including anti-slavery legislation. We never

knowingly support any unfair work or modern slavery practices and we do not support the practice of employing people on minimum wage contracts. The risk of slavery and human trafficking within our own organisation is minimised as a result of the recruitment policies and compliance standards that we have in place and the oversight built into our line management structure throughout our operations.

Our Policies

We are implementing an Anti-Slavery and Human Trafficking Policy which will be circulated to all staff reiterating our stance against modern slavery. To further ensure relevant staff remain aware of and alive to the modern slavery risks in our wider supply chain and the travel and tourism sector, we are implementing additional training for our purchasing team and human resource teams.

In addition to the Anti-Slavery and Human Trafficking Policy mentioned above, the Group has implemented a number of policies and procedures in place to ensure the business is operating in a legal, ethical and consistent manner. Our policies and procedures include:

- **Anti-Bribery and Corruption Policy** – the Group's guidance on identifying, reporting and countering bribery and corruption.
- **Prevention of Facilitation of Tax Evasion Policy** - the Group's guidance on identifying, reporting and preventing the facilitation of tax evasion.
- **Recruitment & Retention** – our recruitment policy and procedures include verification of eligibility to work legally in the UK and our HR Department monitor compliance.
- **Whistleblowing Policy** – the Group has a procedure that encourages staff to raise their concerns about any aspect of the business and provides them a safe and protective environment to do so.

Performance Monitoring & Reporting

The Group's legal team ensure the business is complying with our stated policies and investigate any concerns raised. We encourage all our staff to report any concerns they have and reassure them that their comments will be taken seriously.

This statement will be updated annually and published on our website.

Signed by Alex Francis on behalf of the Board of Directors

Want2BThere Limited