

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

AIM OF POLICY

This statement sets out the Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chains.

1 POLICY STATEMENT

- 1.1 The Company recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking. The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2 Organisational structure and supply chains

- 2.1 This statement covers the activities of the Company. We are a transport and tourism Company that provides a number of different options, including home to school transport and package holidays.
- 2.2 We recognise that we operate in a domain that could be susceptible to the risks of modern slavery and human trafficking.
- 2.3 We currently operate in the following countries:
- Wales; and
 - England.

3 Responsibility

- 3.1 Responsibility for the Company's anti-slavery initiatives is as follows:
- (a) The Head of HR has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
 - (b) The Head of HR has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
 - (c) Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
 - (d) HR is responsible for ensuring our recruitment and employment practices including associated policies & procedures are fair and compliant with

current legislation. The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

4 COMMUNICATION AND AWARENESS OF THE POLICY

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 POLICY BREACHES

- 5.1 The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Grievance Policy and Procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- 5.2 The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- 5.3 The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

STATUS BOX FOR POLICIES

Name of Policy	Modern Slavery and Human Trafficking
Date Reviewed	May 2024
Version	1

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THIS POLICY APPLIES TO:

All employees.

For the avoidance of doubt this policy does not form part of any employee's contract of employment and may be amended from time to time.

Employees should refer to their individual contract of employment for details of their employer and contractual benefits. In the event of any inconsistency between the policy and any provisions in your contract of employment, the terms of the contract will prevail.

It is the responsibility of employees to comply with this Policy. Failure to do so may result in disciplinary action.

THIS POLICY CROSS REFERENCES TO:

Grievance Policy & Procedure
Recruitment Policy

Where an employee has questions about and/or needs clarification of any aspect of this policy, the employee should check with their line manager or a member of the senior management team. Where appropriate, training will be provided in the policy and procedure to ensure knowledge, compliance, and best practice across the organisation.

This policy will be reviewed at least annually to ensure the organisation's policy and practices remain effective, are up to date with legislative and regulatory changes, reflect good practice and capable of supporting the organisation's objectives.