

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2025

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### ABOUT THIS STATEMENT

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This commitment is an integral part of our policies and the way we do business. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps Specialist Holidays Group has taken to ensure that slavery or human trafficking is not taking place in our operations and supply chains.

### ABOUT SPECIALIST HOLIDAYS GROUP

Specialist Holidays Group is a global provider of travel services in the tailormade travel sector made up of three brands; American Holidays, Citalia & Sovereign Luxury Travel. Specialist Holidays Group has a truly global offering with operations across Europe, Indian Ocean, Middle East, North America, Canada & The Caribbean.

### OUR BUSINESS AND SUPPLY CHAINS

Specialist Holidays Group provides a wide range of specialist travel experiences all over the world. More information regarding the range of experiences offered can be found on each brands individual website. The diversity in our travel experiences is reflected in our supply chains. For example, in delivering a single travel experience, we might engage or interact with providers such as accommodation suppliers, travel agencies, airlines, destination management companies and tourist offices.

### SUPPLIER DUE DILIGENCE & CONTRACTING

We believe that combating modern slavery offences begins with effective supplier due diligence. As part of delivering unique travel experiences for our customers, we focus on developing long-term relationships with quality suppliers. We have several steps to ensure that we only work with ethical suppliers and that our expectations of them are clear:

- Supplier Questionnaire:  
Our new Supplier Questionnaire requires that suppliers provide information on their health & safety practices, ethical standards and any sub-contractors used to provide their services. This process should provide us with greater comfort at the outset that new suppliers are committed to acting ethically or, alternatively, highlight any areas of potential concern. It should also provide greater transparency of our supply chain, a key component in reducing the risk of modern slavery.
- Supplier Code of Conduct:  
Along with other aspects, this document reiterates our commitment to adherence with all human rights legislation and reaffirms our zero tolerance stance to issues of child labour, forced labour, threat of violence, harassment, intimidation, debt bondage, bonded labour, human trafficking, compulsory overtime and any other form of modern slavery. We are communicating this document to all existing suppliers and, alongside the questionnaire described above, it forms a key part of the onboarding process for any new relationship.
- Supplier Contract Wording:
- We incorporate anti-slavery provisions in our contracts, as well as general wording requiring compliance with the above Code of Conduct.

## **EMPLOYEE TRAINING & CONFIDENTIAL HOTLINE**

It is crucial that staff have been appropriately trained on issues of modern slavery, which can occur in our industry. Over the last year we have re-launched compliance training sessions for our businesses. This training includes guidance on effective supplier due diligence, as well as identifying and preventing bribery & corruption (which sometimes accompany issues of modern slavery).

In our last statement we highlighted the installation of a whistleblower hotline for our employees. This serves as a reporting channel for all manner of illegal or unethical activity across our businesses. As such, it could help identify any potential issues of modern slavery within our supply chain. In the past year we have re-communicated the availability of this tool to all employees. We will continue to take measures to ensure we remind staff of its existence during onboarding and at other key staff meetings.

## **OUR FUTURE PLANS**

We have taken some good steps over the past year but we recognise that there is still more to do. We will aim to further strengthen our approach to managing modern day slavery risks. Specifically, we aim to carry out the following activities:

- Establish a baseline percentage of suppliers who have signed up to the Code of Conduct so that we can thereafter focus on improving this year on year.
- Increase awareness of modern slavery issues internally by including additional information in employee documents.
- Conduct further staff training on supplier due diligence and issues of modern slavery.
- Ensure that standard modern slavery clauses are in place in all high-risk supplier contracts.

## **IMPACT AND MONITORING**

We will use the tasks outline above to measure our progress in combating modern slavery. We will also consider whether we have had any instances of modern slavery cases or issues of concern.