

## Modern Slavery Statement

### Effective Date January 2022 - Third Statement

Elegant Resorts is committed to ensuring that every part of its operation is carried out professionally in accordance with best practice and legislation. The UK Modern Slavery Act 2015 (the 'Act') requires business to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. We are fully committed to playing our part in eradicating modern slavery.

This statement sets out the steps we have taken during the financial year ending 31st December 2021.

On reviewing our risk of modern slavery in our operation, we have again had no reports of any incident in our supply chain (or of any human trafficking offence). We have not had to take any action (termination of contract or otherwise) against any supplier because of the findings of the modern slavery questionnaire or otherwise in relation to modern slavery in this past year.

### About Elegant Resorts

At Elegant Resorts, luxury travel is in our DNA. True pioneers in the industry, we were the first specialist tour operator of our kind when we emerged back in 1988, and it is our mission to continue to evolve and be the first and only place for your luxury travel experiences. We offer our discerning clients an ever-expanding, eclectic portfolio of luxury holidays and bespoke experiences that span the globe – from tropical beach breaks to luxury cruising to culture-rich tailor-made tours. We are committed to offering nothing less than perfection, constantly vetting and reviewing all the products and experiences we offer, to ensure we only work with the best. We believe that by working with our suppliers we can ensure environmentally, and socially sustainable supply chains are maintained.

Most of our team is based at our headquarters in Chester, and following the pandemic, we have introduced a flexible 'hybrid working' policy to continue with home/office working to suit individual preferences and promote the best working environment.

We will not tolerate slavery and human trafficking. We require all supplier and partner organisations we work with to operate to the highest standards both internally and in managing their own supply chains and to share our values and respect for human rights.

Due to the nature of our business, we assess ourselves to have a small degree of risk of modern slavery in our business and supply chains as we procure services from a range of UK and international suppliers.

### Suppliers

We approach the relationships with our suppliers in a fair and transparent manner. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsible (CSR) standards including but not limited to compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.

### Our People Policies

# ELEGANT | RESORTS

MASTERS IN LUXURY TRAVEL SINCE 1988

In 2020 and 2021, we adapted many employee programmes to meet the needs of remote working during COVID-19.

We champion diversity at work, are part of the Mindful Employer Charter, and the wellbeing of our employees is paramount. We have a team of Wellness Ambassadors and Mental Health First Aiders that oversee monthly themed newsletters and activities, whilst we also offer weekly yoga classes, an in-house gym and regular challenges to help keep us fit and healthy. We also have a Responsible Travel steering group that drives our focus to continue to develop our CSR journey. Their role includes organising fundraising activities for local charities and developing our internal practices to reduce our overall carbon footprint. We also strive to work with likeminded suppliers and hotels who share the same values when it comes to caring for the planet and its people.

We also have in place many other policies which support recognised human-rights principles. These include policies on Equality, Diversity and Inclusion, Business Conduct Policy, Dignity at Work, Mental Health, Health and Safety and Anti-Bribery and Corruption.

**Modern Slavery Policy** - We promote our Modern Slavery Policy within our intranet which is available to all colleagues and is provided upon commencement of employment. We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally and are paid at least the national minimum wage.

**Whistleblowing Policy** - We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Elegant Resorts. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

**Annual training** – during 2022 we will raise awareness of modern slavery issues by ensuring annual mandatory training for all our employees. The training explains the principles of the Modern Slavery Act and how to identify and flag up potential slavery and human trafficking.

## **Our effectiveness in combatting slavery and human trafficking**

We will use the following to measure how effective we have been to ensure that slavery and human trafficking is not taking place in our business or supply chains.

- Completion of spot-checks and supplier site visits by managers
- Monitoring of payroll and labour systems
- Communication and personal contact with our supply chain to ensure their understanding of and compliance with our expectations
- Training and ongoing awareness for our own employees

Signed



Lisa Fitzell

MD

February 2022