



This statement sets out STA Travel'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 our business and our supply chains. These actions and activity are conducted throughout the financial year.

As part of travel and tourism industry, STA Travel recognises that it has a responsibility to take a robust approach to slavery and human trafficking. STA Travel is absolutely committed to preventing slavery and human trafficking in our activities, and to ensure that our suppliers are free from slavery and human trafficking.

Organisational structure and supply chains

STA Travel provides flights, tour and accommodation services to customers travelling the world. We engage with reputable and safe suppliers of travel products and services that demonstrate a duty of care to our customers in the services they provide, the welfare of people they employ, and the impact services have on the environment.

Responsibility

To demonstrate our commitment to anti-slavery and human rights, we have a number of mechanisms in place:

- *Policies:* Company policies are developed by our People & Culture teams in consultation with the employee community and our commercial teams. Policies are approved by the People & Culture Director and are reviewed on an annual basis.
- *Risk assessments:* Whether it be monthly, quarterly or yearly, we conduct audits throughout the organisation to ensure compliance with policies and governance is being adhered too. We conduct regular workplace training, educating our people and suppliers on our standards, ensuring we have a consistent approach to policy, and people are informed of how to assess and rectify non-compliance issues
- *Investigations/due diligence:* Matters pertaining to workplace relations are investigated by trained individuals within the People & Culture team. Suppliers are regulated by our Global Land, Air and Product teams to ensure compliance and corrections on non-conformances.

Relevant policies

STA Travel operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- *Whistleblowing Policy:* STA Travel encourages all its people, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisations with which we operate. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for people to make disclosures, without fear of retaliation.



- **Code of Conduct & Ethical behaviour:** STA Travel's code makes it clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Equal Opportunity Policy:** STA Travel uses only specified and reputable employment agencies to source labour and always verifies the practices of any new agency it is using, before accepting workers from that agency. STA Travel seeks details around the agencies practices, its client base, employee turnover, diversity and equal opportunity practices prior to entering into preferred supplier agreements. Should the practices of the agency violate human rights, STA Travel will terminate its relationship and report the agency to the relevant authority.
- **Supplier Code of Conduct:** STA Travel is committed to ensuring that our 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. STA Travel works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of our supplier code of conduct will lead to the termination of the business relationship. During the procurement process, STA Travel seeks various forms of information to demonstrate that the supplier is meeting or exceeding the legal standards required by law, and policies suppliers have in place to ensure the protection of human rights.
- **Corporate Social Responsibility:** STA Travel works with the Association of British Travel Agents (ABTA, The Travel Association), and regularly refers to their Global Welfare Guidance for Animals in Tourism (www.abta.com/animalwelfare), which apply a series of minimum requirements to ensure animals involved in the attractions we promote are properly cared for. We request input from other national travel agency associations and have also partnered with international wildlife charity, The Born Free Foundation <http://www.bornfree.org.uk/> who advise us on all activities involving animals, helping us reduce our impact on animals in tourism worldwide.

Due diligence

STA Travel undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping; and
- conducting supplier audits or assessments.

Finally, we are proud of our people as they are the spirit and driving force behind our success over the past 35 years. As an employer, we ensure that we meet or exceed employment standards, have policies in place to protect human rights, and afford our people the opportunity to develop in our diverse and multicultural workplace.