



We are proud of the steps we have taken to combat slavery and human trafficking.

Travel Leaders Group Holdings, LLC dba Internova Travel Group (“Company”) and all its subsidiaries have a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chain, consistent with its obligations under The Modern Slavery Act 2015.

The Company also expects the same high standards from all its suppliers, contractors and other business partners. The Company accepts that it has a responsibility through practical and reasonable due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety, and human right laws and standards are being adhered to, including freedom of movement and communication.

The Company’s Anti-Slavery and Human Trafficking Policy applies to all individuals working for the Company or on the Company’s behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

### **Organisation Structure**

Our UK business is organised into the following business entities: ALTOUR International Limited; Barrhead Travel Service Limited; Colletts Travel Limited; Global Travel Collection UK, Ltd.; and Y.E.S. (Your Event Solutions) Limited.

We are a travel services company that provides travel arrangements and offers other travel related services to individual, company, and organisation.

### **Our policies on human trafficking**

Our Anti-slavery and Human Trafficking Policy reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in any of our supply chains.

### **Due diligence process for slavery and human trafficking**

The Senior Executives have overall responsibility for ensuring that the policy complies with the Company’s legal and ethical obligations.

The Human Resources Department has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedure to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company’s business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

### **Compliance**

The prevention, detection and reporting of modern slavery in any part of the Company’s business or supply chains, whether in the UK or abroad is the responsibility of all those working for the Company or

under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager immediately.

You are encouraged to raise concerns about any issue or suspicions of modern slavery in any part of the company's business or supply chains as soon as possible.

If you are unsure about whether a particular act, the treatment of workers or their working condition within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the UK Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business and on any of its supply chains.

We have a dedicated governance team, which consists of involvement from the following departments: Legal, Compliance, and Human Resources.

## **Training**

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering on new or renew contracts with them.



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Jacqueline Dobson  
President, Barrhead Travel



Maria Baty (Apr 1, 2021 11:26 GMT+1)

Maria Baty  
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Jason Oshiokepkhai (Apr 1, 2021 12:34 GMT+1)

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Managing Director  
Global Travel Collection U.K.



Sue Gill (Apr 1, 2021 15:10 GMT+1)

Sue Gill  
Managing Director, YES!

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2023.