Modern slavery statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that ITC Travel Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our businesses or their supply chains. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ITC Travel Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

ITC Travel Group is a UK-based business, established in 1974, ITC pioneered the concept of luxury travel in the UK. We have 167 staff and operate in the United Kingdom, Barbados, and Antigua. We work with several suppliers, mainly our hotel partners, Destination Management Companies (DMC's) and airlines.

Our High-Risk Areas

There are several countries we outsource business to that we consider high risk and we have taken steps to ensure our third-party suppliers have been issued with our code of conduct.

Ethical Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1.Anti-slavery and Human Trafficking Policy: This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go to for help.
2. Recruitment Policy: We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing Policy: We operate a whistleblowing policy so that all employees know that they can safely raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of Conduct: This code explains the way we behave as an organisation and how we expect our employees and suppliers to act

Our Suppliers

ITC Travel Group operates a supplier code of conduct policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred partner. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.

2. They hold their own suppliers to account over modern slavery.

3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).

4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We conduct training for our teams across the ITC Travel Group so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement

Approval for this Statement

This statement was approved by the Board of Directors on 01 July 2025

Phil Aird-Mash CEO,

ITC Travel Group July 2025