

Modern Slavery and Human Trafficking Statement

Applicable to all Fello Travel Employees

Overview

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that Fello has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Fello 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 in place effective systems and controls to safeguard against any form of modern slavery within the business or our supply chain.

The Company is committed to:

- ensuring compliance with The Modern Slavery Act, not just within the UK but in any other country within which the Company may carry out its business or in relation to which its business may be connected
- enabling employees and persons associated with the Company to understand the risks associated with the Modern Slavery Act and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing.
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with.
- maintaining an effective framework for dealing with any suspected instances of Modern Slavery.

Our business

We are a top 50 award-winning travel management company, bringing a totally traveller-focused ethos together with professionally managed travel services. We put the traveller at the heart of everything we do, and we exist to make booking travel as easy and hassle-free as possible.

Our high-risk areas

As an organisation operating globally, we recognise the importance of understanding other cultures and the risks they pose in relation to modern slavery.

All of our employees are fully trained to understand these risks and carry out relevant checks where appropriate, to ensure we are not at any point working with or associating with any organisations that engage in behaviour deemed to be Modern Slavery.

Our policies

We have a number of internal policies to ensure we conduct business in an ethical and transparent manner. These include:

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- Modern Slavery Policy.
- Corporate Social Responsibility and Ethical Conduct Policy. This policy sets out the organisation's stance on modern slavery, equality and harassment, anti-bribery, and child labour, and explains how employees can identify any instances of these and where they can go for help.
- Supplier Code of Conduct Policy. This policy sets out the organisation's stance on modern slavery, equality and harassment, anti-bribery, and child labour, and explains the behaviour expected of our suppliers.
- Recruitment procedure. We operate a robust recruitment procedure, 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.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated or practices within our business or supply chain, without fear of reprisals.
- Code of conduct. This code explains how we behave as an organisation.

Our suppliers

Fello works with supply chains globally, operates a supplier policy, and maintains a preferred supplier list. We conduct due diligence on all suppliers before approving them as preferred suppliers. This due diligence includes an online search to ensure that the particular organisation has never been convicted of offences relating to modern slavery. Our Supplier Code of Conduct ensures that all suppliers comply with our defined behaviours and require them to confirm that no part of their business operations contradicts our Policy.

Our code of conduct for suppliers dictates that they:

- Have taken steps to eradicate modern slavery within their business.
- Hold their own suppliers to account over modern slavery.
- (For UK-based suppliers) they pay their employees at least the national minimum wage / national living wage (as appropriate).
- (For international suppliers) they pay their employees any prevailing minimum wage applicable within their country of operations.
- Uphold equality and prevent harassment in their organisations.
- Take appropriate steps to prevent bribery.
- Take steps to prevent child labour.

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- Act in accordance with Health and Safety at all times.
- We may terminate the contract at any time should any instances of modern slavery or other breaches of our Supplier Code of Conduct come to light.

Training

We regularly conduct training for our teams 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 are not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Internal training is completed on understanding and preventing Modern Slavery.

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