

Modern Slavery Statement

Effective Date January 2023 - Fourth 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.

Modern Slavery and Human Trafficking abuse the freedom and rights of an individual and go against our core values and principles. We are committed to creating and ensuring an inclusive, non-discriminatory and respectful working environment. We want all our people to feel confident that they can highlight wrongdoing without any risk to themselves.

We do not enter business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

This statement sets out the steps we have taken during the financial year ending 31st December 2022.

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.

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

ELEGANT | RESORTS

MASTERS IN LUXURY TRAVEL SINCE 1988

conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.

We champion responsible travel through our partnership with Positive Luxury, and we display The Butterfly Mark alongside awarded resorts. Positive Luxury connects luxury lifestyle brands with a global audience of people that care, awarding The Butterfly Mark to resorts according to their social and environmental framework, governance and philanthropy – helping people discover brands to trust. The Butterfly Mark is recognised as a guarantee of commitment to sustainability.

Our People Policies

During 2022 we continued to improve our business processes to support the new way of remote and hybrid working and refreshed many of our policies to reflect the fact that not everyone is face to face. We continued our regular surveys which help us to continually adapt our people strategy, proactively meet everyone's needs and support ongoing health and wellbeing.

Our recruitment process has been audited to make sure that we remain compliant with all legislation and ensure that we attract the best talent into the business. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

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.

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.

Annual training – during 2022 we raised 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

ELEGANT | RESORTS

MASTERS IN LUXURY TRAVEL SINCE 1988

Signed

A handwritten signature in black ink, appearing to read "L Fitzell". The signature is written in a cursive, flowing style.

Lisa Fitzell
MD
January 2023