

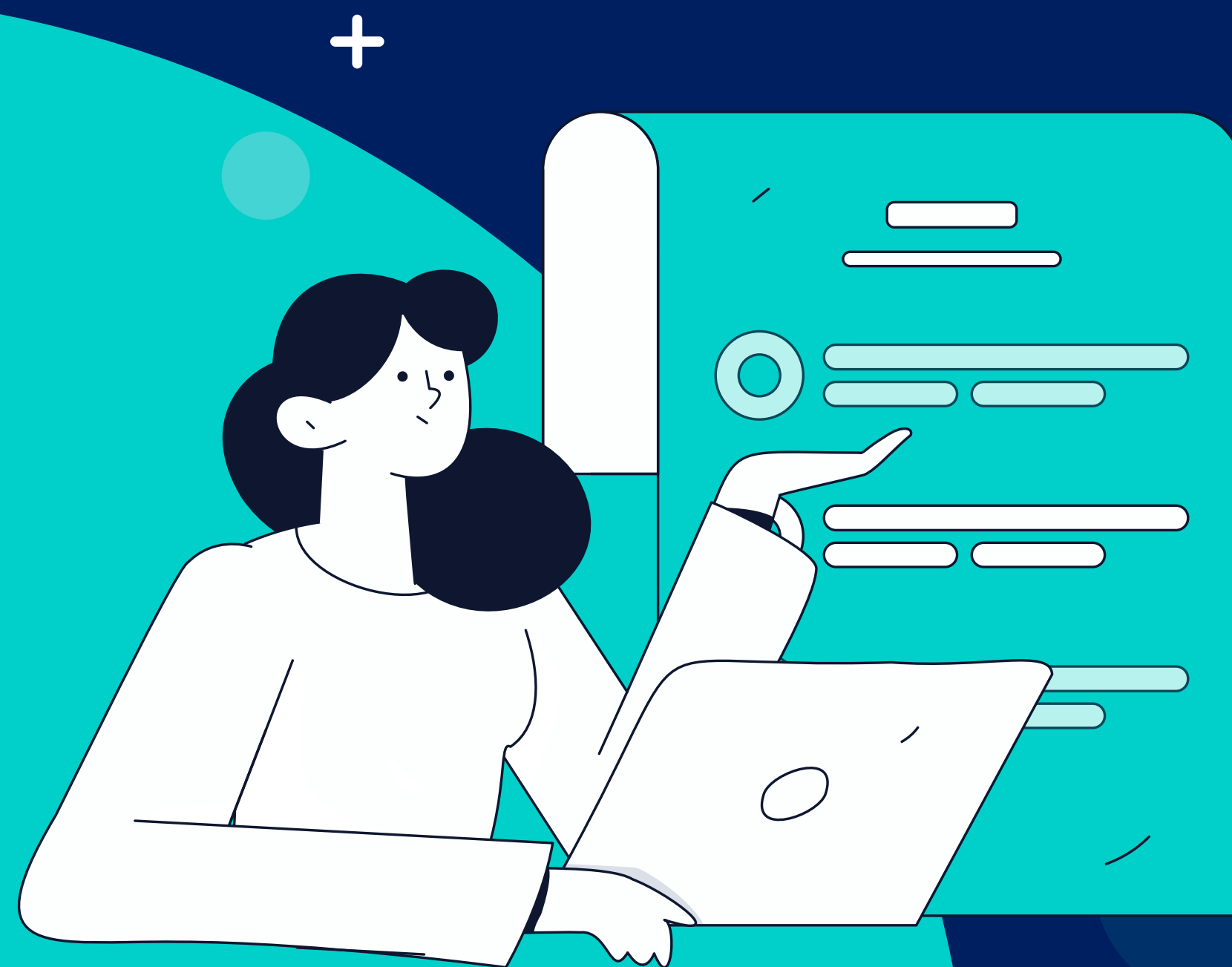
Building travel brands for the future

# Modern Slavery Statement 2026



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# CEO introduction



At Portman Travel Group, we are committed to respecting, protecting and promoting the human rights of our employees and the wider communities in which we operate. Modern slavery, defined by the UK Government as slavery, servitude, forced or compulsory labour, and human trafficking, is a fundamental violation of these rights.

Throughout 2025, Portman Travel Group continued to strengthen its approach to identifying and managing the risks of modern slavery across our operations. We do this through robust policies, ongoing employee education, and regular risk assessments. We also recognise the critical role our supply chain plays in our broader responsibility to prevent modern slavery. In 2026, we will implement a new supplier due-diligence tool to enhance the transparency and effectiveness of our supply chain monitoring and risk management processes.

This statement summarises the progress we have made in preventing modern slavery and human trafficking within Portman Travel Group. It also reaffirms our commitment to supporting global efforts to eradicate all forms of modern slavery and outlines our future plans to further mitigate risks across our organisation and supply chain

**Redmond Walsh**  
CEO Portman Travel Group



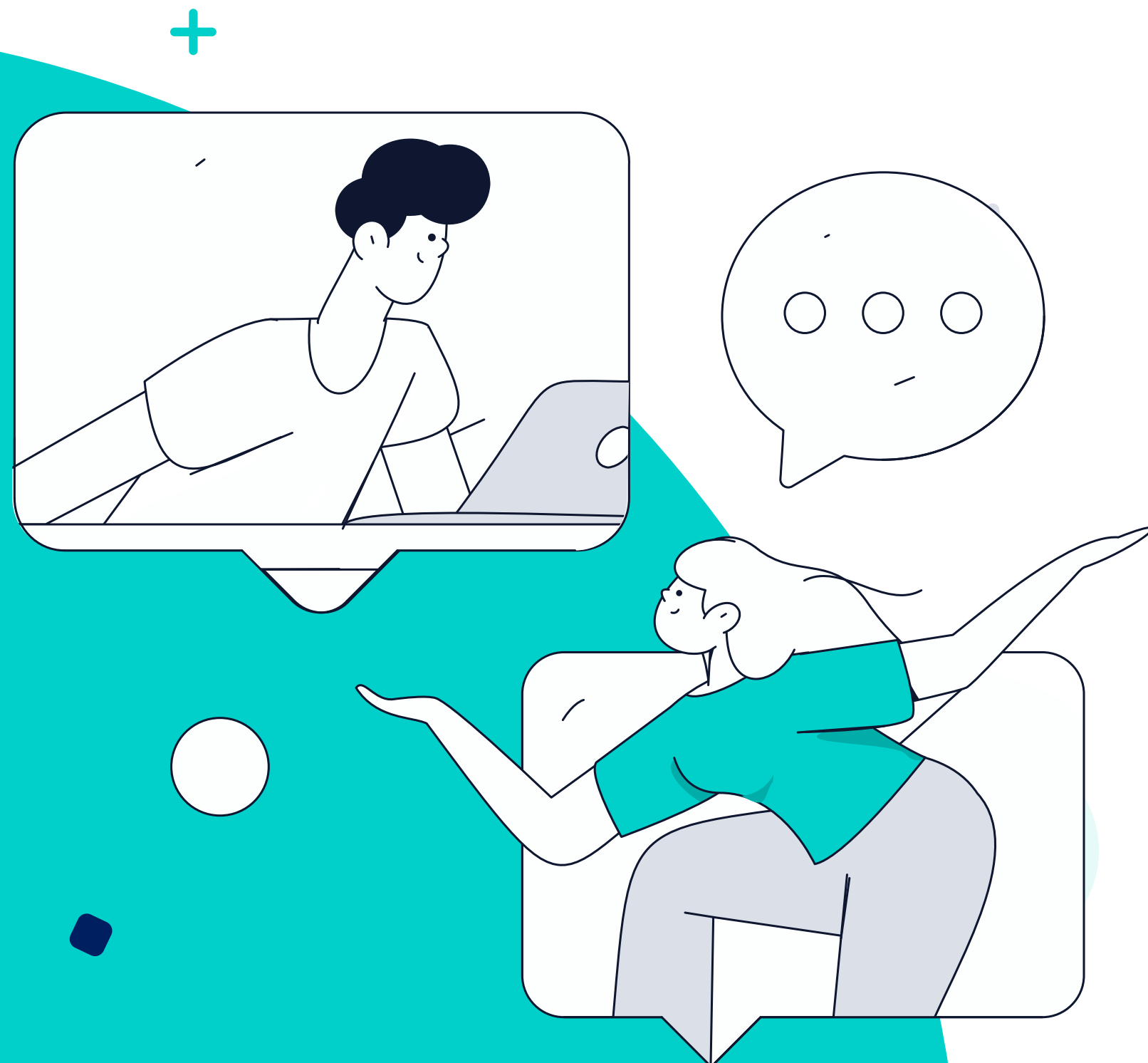
# What is modern slavery?

Modern slavery is an umbrella term used to describe serious human rights abuses, including forced labour, human trafficking, debt bondage, and child exploitation. These practices involve the systematic removal of an individual's freedom through coercion, deception, or abuse of vulnerability, and may include the restriction of movement, withholding of wages, retention of identity documents, or threats and intimidation.

Modern slavery remains a significant global issue. It is estimated that 50 million people were living in conditions of modern slavery worldwide in 2021\*, demonstrating both the scale and persistence of this crime. Addressing modern slavery requires sustained and coordinated action by governments, businesses, and wider society to prevent exploitation, identify risks, and support victims.

As a responsible employer and travel services group, Portman Travel Group (PTG) is committed to preventing modern slavery and protecting the rights and wellbeing of individuals connected to our operations, including our employees, customers, suppliers, and partners. We recognise that the travel and tourism sector presents particular challenges, including long, complex, and often global supply chains, where visibility of labour practices can be limited beyond direct contractual relationships.

\* The Global Slavery Index 2023



# Our approach + commitment

PTG operates across a diverse range of travel-related services and works with a broad network of suppliers, including hotels, airlines, destination management companies, and event providers. While we do not directly employ frontline workers within many parts of the sector, we acknowledge our responsibility to act responsibly within our sphere of influence. We seek to do this through robust governance, responsible procurement practices, clear expectations of our suppliers, and collaboration with partners to promote safe, ethical, and responsible business practices across the travel ecosystem.

This statement outlines the actions taken by Portman Travel Group to address the risks of modern slavery and human trafficking within its operations and supply chains, alongside the Groups ongoing commitment to transparency, continuous improvement, and compliance. It has been prepared in accordance with Section 54 of the UK Modern Slavery Act 2015 and applies to Portman Travel Group and its subsidiaries listed within this report, including brands operating within the named subsidiaries for the reporting period 1 January 2025 to 31 December 2025. It has been approved by the Group Chief Executive Officer on 12 May 2026.



# Our operations

Based in the UK, Portman Travel Group is a technology-led travel sector specialist, with a portfolio of complementary travel companies. We specialise in acquiring and building global travel brands... to build brands for the future.

- **Clarity Business Travel**

We make business travel straightforward. Delivering the right service at exactly the right moment to get your people where they need to be, safely, efficiently, and cost-effectively.

- **Evolvi**

The acknowledged market leader in online corporate rail booking through its self-booking tool, Evolvi has successfully transitioned into new market area through its rail API, partnering with some of the biggest brands in international travel.

- **One Global**

A global community of world leading TMC's formed by two of the world's largest – Clarity Travel Management and World Travel, Inc. We are a community of local experts, working together to deliver an all-in-one global travel solution.

- **Destination Sport Group**

Destination Sport Group sets the global standard in sports travel, offering our partners and clients a tailored approach and best-in-class solution via seven market leading divisions.

With a global footprint across UK and Europe, North America, Middle East, China and Australia, we are a truly unique sports travel business.

- **If Only**

If Only is a multi award-winning, luxury tour operator that provides bespoke holidays and tours to some of the most breathtaking destinations in the world. We are 100% trade focused, selling our holidays through travel agents.

- **Elegant Resorts**

Founded in 1988, Elegant Resorts were the first specialist tour operator of our kind. We offer our 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.



# Global office locations

UK – London, Reading, Gloucester, Bury St Edmunds, Eastleigh, Derby, Manchester, Stockport, Chester, Glasgow, East Kilbride, Edinburgh

France – Paris

US – Atlanta, Boston

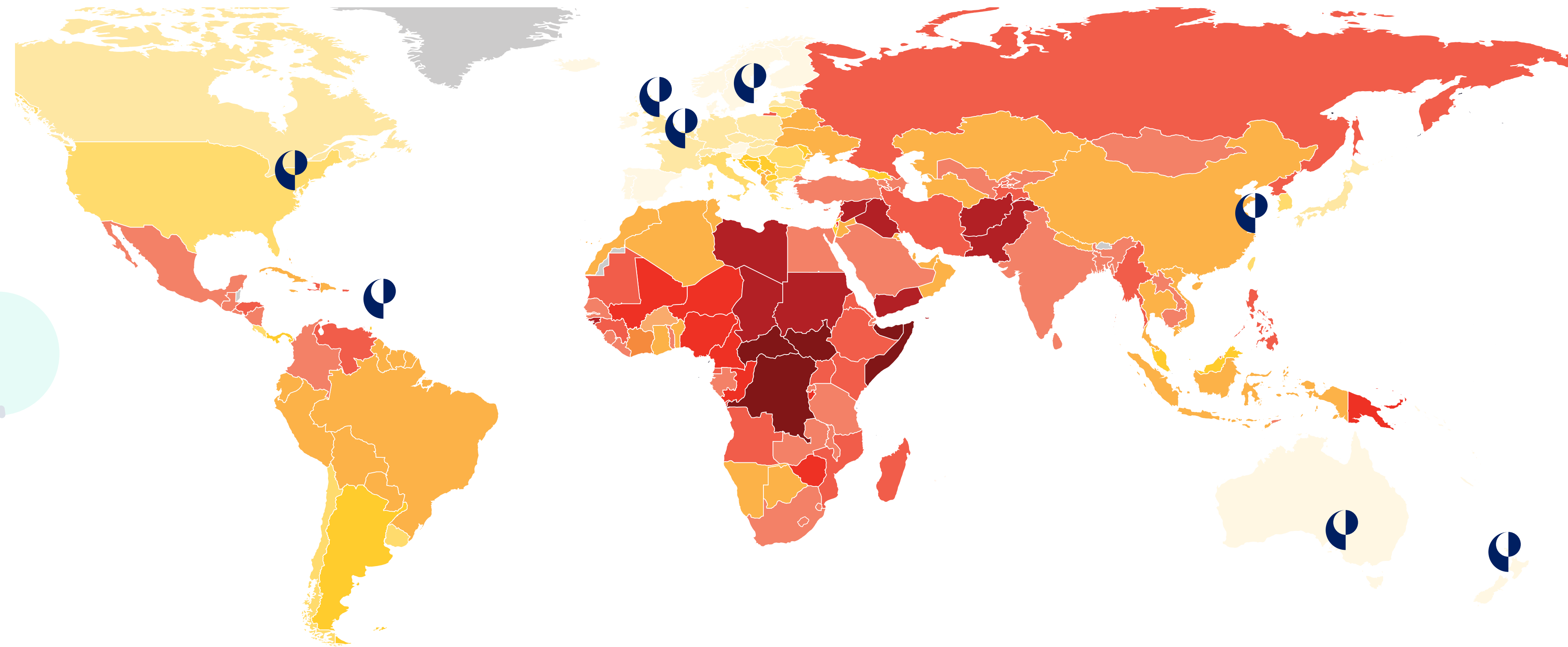
Australia – Adelaide

China – Shanghai

New Zealand – Auckland

Barbados

Sweden – Stockholm



Map – Estimated vulnerability to modern slavery by country\*

 Portman Travel Group global offices

Low  High

\*Source: Walkfree.org - data-maps

# Risk assessment and risk appetite

Portman Travel Group (PTG) has undertaken a structured risk assessment to evaluate the potential risk of modern slavery and human trafficking within its operations and supply chain. The assessment was conducted based on the Slavery and Trafficking Risk Template developed by the Social Responsibility Alliance, providing a consistent and proportionate framework aligned with recognised good practice.

The risk assessment considers key areas including policies and governance, supply chain management, risk identification and escalation, training and awareness, reporting and internal accountability. This enables PTG to assess both inherent and residual risks across the Group in a transparent and systematic way.

## ● Risk appetite

PTG has a low-risk appetite for modern slavery and human trafficking and does not tolerate any form of forced labour, child labour, or human rights abuse within its operations or supply chains. While the nature of the travel and hospitality sector presents some inherent exposure due to the scale and complexity of global supply chains, PTG's approach is to reduce residual risk to a level that is as low as reasonably practicable, supported by proportionate controls, oversight, and continuous review.

## ● Risk assessment outcomes

As at December 2025, PTG has identified no critical or high-risk residual modern slavery risks within its operations or supply chain. All identified risks are assessed as being at or within the Group's defined risk appetite and tolerance levels. There have been no material changes to the modern slavery risk register during the reporting period.

PTG will continue to review modern slavery risks and associated controls on a regular basis to ensure mitigations remain effective and responsive to emerging risks, regulatory developments, and changes within our operations or supply chains.

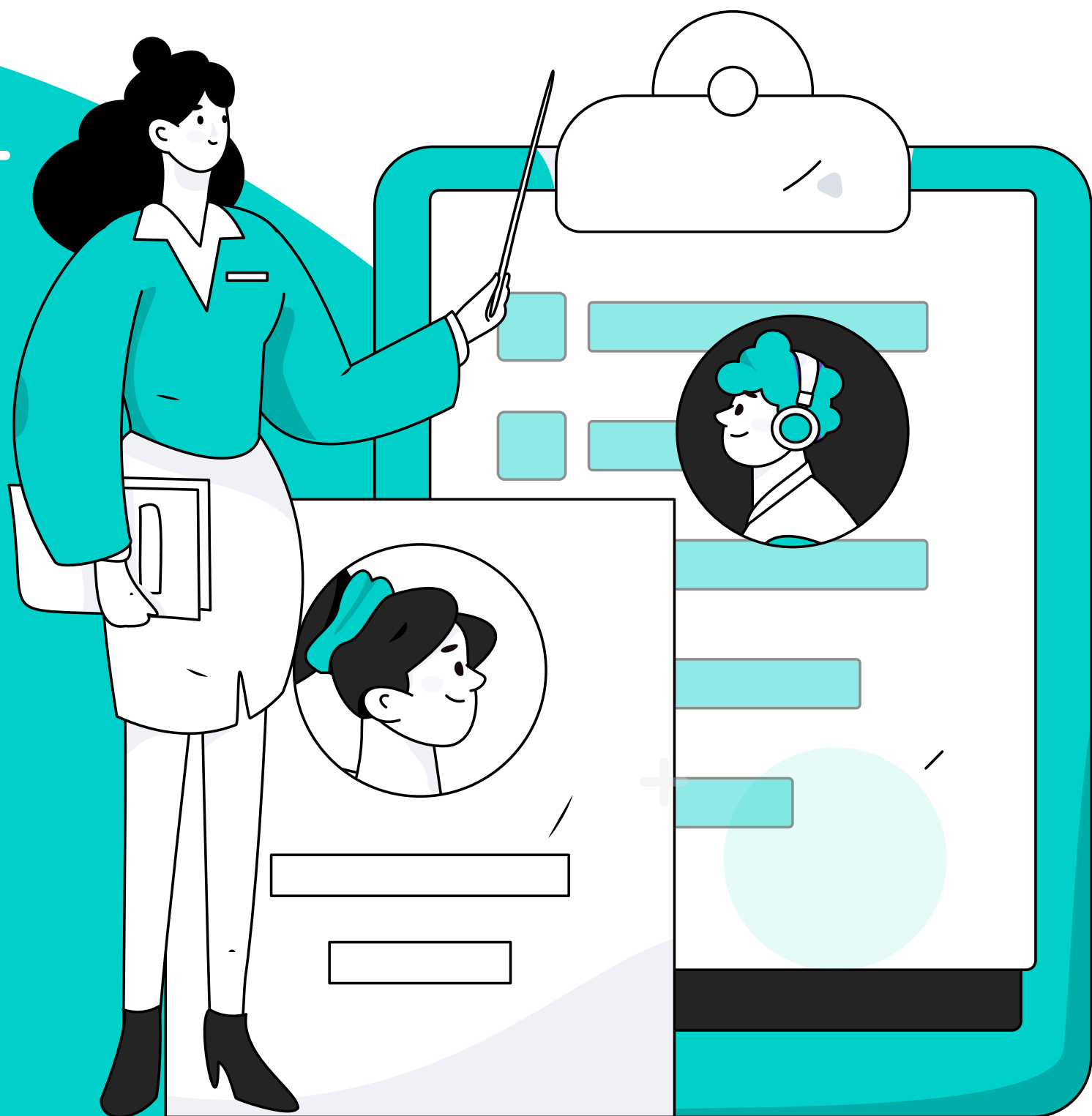
## ● Strategic risk ownership + oversight

Modern slavery and human trafficking are recognised as a strategic risk within Portman Travel Group's enterprise risk framework. The risk is currently assessed as being within tolerance, reflecting the Group's low risk appetite, proportionate controls, and ongoing monitoring arrangements.

Ownership of modern slavery risk sits with a member of the PTG Executive team, ensuring senior-level accountability and leadership oversight. Strategic oversight is provided through the Governance, Risk and Compliance (GRC) Committee, which is responsible for reviewing risk assessments, monitoring control effectiveness, and overseeing mitigation actions. The GRC Committee reports regularly to the Board, supporting robust governance, consistent escalation, and alignment with PTG's ethical commitments and legal obligations.



# Recruitment & our operations



PTG are committed to preventing modern slavery, forced labour, child labour, and discrimination within its operations and supply chains. We operate fair and responsible recruitment practices, including the completion of right-to-work checks for all employees. PTG never withholds personal documents, does not charge recruitment fees to workers, and predominantly manages recruitment in-house. Where third-party recruitment agencies are engaged, they are subject to robust due-diligence checks and contractual standards.

PTG ensures all employees are paid at least the National Minimum Wage and are provided with a clear, fair, and accessible employment contract written in a language they can easily understand. Where zero-hour contracts are occasionally used for role-specific or casual work, formal processes are in place to ensure fair treatment, transparency, and appropriate safeguards.

We recognise that, while the risk of modern slavery within our recruitment and employment practices is assessed as low, there remains a remote possibility of human error. To mitigate this risk, PTG has implemented training, governance controls, and formal vulnerability and risk assessments. A small number of risks within this category are assessed as at tolerance, reflecting the potential impact rather than likelihood, and continue to be actively monitored.

# Recruitment & our operations



## Supply chain

Portman Travel Group (PTG) has considered the risks of modern slavery and human trafficking within its supply chains. Our supply chain is global and diverse, spanning a range of geographies, sectors, and supplier sizes. Given the nature of the travel and hospitality industry, the breadth of our value chain, and the use of varied or, in some cases, informal supplier arrangements, we assess our supply-chain modern slavery risk as within tolerance. This reflects inherent sector-related risks and our limited direct control beyond certain supplier tiers.

To strengthen our approach and improve oversight, PTG plans in 2026 to further align procurement and supplier governance processes in support of our commitment to preventing modern slavery and human trafficking. These actions will include the introduction of a third-party supplier risk assessment tool and the development of a consistent Supplier Code of Conduct across Category 1 and Category 2 suppliers for the group. These measures are intended to enhance risk identification, promote transparency, and set clear expectations for ethical labour practices across our supply chain. Progress against these actions will be monitored and reviewed as part of our ongoing governance and risk management processes.

# Our progress in 2025

## Training and Awareness

Portman Travel Group (PTG) requires all employees to complete mandatory modern slavery e-learning on an annual basis, ensuring ongoing awareness and compliance with legal and ethical obligations. Training is refreshed every 12 months to reflect emerging risks, legislative developments, and recognised best practice.

The training provides employees with a clear understanding of modern slavery and human trafficking, including the different forms of exploitation, how these risks may present within the travel and hospitality sector, and the role employees play in identifying and addressing concerns. Employees are guided through recognised indicators of modern slavery and the appropriate internal and external channels for reporting concerns.

The training includes embedded knowledge checks and assessments, requiring employees to achieve a minimum pass rate of 80% to successfully complete the course. This approach supports assurance that employees not only complete the training but also demonstrate understanding of key concepts, indicators, and reporting expectations. awareness, engagement, and compliance across the organisation.

In 2025, the Group undertook a comprehensive review and update of the training content, with a staggered rollout planned for the first half of 2026. The updated training now incorporates the International Labour Organization (ILO) indicators of forced labour, enhanced sector-specific case studies, and practical reporting scenarios. These updates are designed to strengthen employees' ability to recognise potential indicators of exploitation and to respond appropriately and confidently.

The modern slavery training is supported by PTG's wider policy framework, including the Human Rights Policy, Whistle Blowing Policy, and Recruitment and Employment practices, helping to demonstrate a coherent and integrated approach to preventing modern slavery and underpinning employee awareness and behaviour.

PTG has set a target of 95% training completion, considering employees who may be absent for extended periods of leave. Completion rates and assessment outcomes are monitored, with follow-up actions taken where required to maintain high levels of awareness, engagement, and compliance across the organisation.



# Our progress in 2025

## ● Risk assessment and due diligence

PTG undertakes proportionate risk assessment and due-diligence activities to identify and manage potential modern slavery and human trafficking risks within its supply chains.

In 2025, Clarity completed the UK Government's Modern Slavery Assessment Tool (MSAT), achieving a performance score of 72% across six assessment areas. The findings have been reviewed in detail, and a structured five-year improvement plan has been developed to address identified opportunities. Where appropriate, learning and actions arising from the MSAT assessment will be applied across the Group to support a consistent and best-practice approach to risk management.

## ● Our supply chains

In 2025, Clarity, One Global, Elegant Resorts, and If Only introduced Supplier Codes of Conduct for key supplier categories. These Codes accompany contractual arrangements and clearly set out our expectations in relation to ethical business conduct, labour standards, human rights, and compliance with applicable laws. This approach supports greater consistency, transparency, and accountability across our supplier relationships.

## ● Governance, risk and compliance

Portman Travel Group's governance structure includes a Governance and Risk Committee (GRC), comprising representatives from each Business Unit. The Governance, Risk and Compliance Committee plays a central role in overseeing the effectiveness of the Group's approach to preventing modern slavery across both operations and supply chains.

The Committee provides coordinated oversight of governance, risk management, and compliance activities, including the maintenance of the enterprise risk framework, monitoring of emerging risks, and review of relevant policies, controls, and training. Through regular reporting to the Board and engagement with divisional leadership, the GRC Committee supports consistent risk identification, escalation, and mitigation, helping to ensure potential modern slavery risks are understood, addressed promptly, and managed in line with PTG's ethical commitments and legal obligations.

## ● Policies and reporting mechanisms

Portman Travel Group is committed to identifying and addressing potential risks to human rights, including modern slavery and human trafficking. We encourage employees, suppliers, customers, and other stakeholders to raise concerns where they believe actual or potential risks may exist.

Concerns can be raised confidentially through the Group's Whistle blowing procedure, which is accessible to employees via the intranet. All disclosures are treated seriously and handled in a timely, confidential, and appropriate manner, in line with internal policies and legal requirements.

External parties can access information on making a disclosure here: [Whistle blowing](#)

## ● Effectiveness and outcomes

During the reporting period for 2025, no instances of modern slavery or human trafficking were identified or reported within Portman Travel Group's operations or supply chains. We continue to monitor risks proactively and recognise the importance of ongoing vigilance, review, and improvement.



# 2025 summary of actions and effectiveness

Area	Training and Awareness	Risk Assessment	Supplier Governance	Government Reporting and Transparency	Recruitment and Employment Practices	Whistle blowing and Reporting
<b>Key activity</b>	Mandatory modern slavery e-learning updated and roll out in progress across the Group	Group-wide Modern Slavery Impact Assessment aligned to the framework set out by the Social Responsibility Alliance	Supplier Codes of Conduct implemented across Clarity, Elegant Resorts, and If Only	Completion of the UK Government's Modern Slavery Assessment Tool (MSAT) by Clarity	Reinforcement of right-to-work checks, zero-fee recruitment principles, and agency due diligence	Internal reporting channels reinforced and re-communicated
<b>Outcome / Effectiveness</b>	Target completion rate of 95%; training includes ILO indicators, practical case studies, and clear reporting scenarios to support awareness and early identification	No critical risks identified; all assessed risks determined to be within tolerance and subject to ongoing monitoring	Codes distributed to hotels and airlines within priority supplier categories, embedding consistent expectations on labour standards and human rights	Achieved a 72% performance score; results used to inform a structured improvement plan	All recruitment activities remain compliant with UK employment law and modern slavery controls; recruitment predominantly managed in-house	Clear, confidential, and protected routes for raising concerns maintained and accessible to all employees  Disclosure reporting included in Quarterly GRC compliance report for board visibility



# Future commitments

In 2026, Portman Travel Group (PTG) will continue to strengthen the transparency, consistency, and oversight of its supply chain as part of our commitment to preventing modern slavery and human trafficking. Not all the activities will be completed within 2026 and will be ongoing areas of work that we will mature and extend the scope of in time.

We will begin the introduction of a structured supplier tiering framework to better map and categorise suppliers based on risk profile, supplier category, and PTG's level of influence. This approach will help ensure that suppliers assessed as higher-risk or strategically significant are subject to enhanced scrutiny, proportionate due diligence, and targeted engagement. Alongside this, PTG will implement an enhanced due-diligence and risk-assessment tool, enabling more consistent, data-driven identification and monitoring of modern slavery risks across the supply chain.

A further priority for 2026 is the development and launch of a Supplier Code of Conduct for the whole group and top level. This Code will set out clear expectations for suppliers in relation to labour rights, ethical business practices, environmental responsibility, and the prevention of modern slavery and human trafficking. Following launch, the Code of Conduct will be embedded into supplier onboarding, contracting, and ongoing engagement processes, ensuring all suppliers understand and commit to PTG's ethical standards.



# Future commitments

Through the Governance, Risk and Compliance (GRC) Committee, and aligned to the Group's Enterprise Risk Management (ERM) Framework, PTG will also undertake a review of procurement practices, including an assessment of modern slavery controls within supplier contracts. This work will be conducted collaboratively across business units to support greater standardisation of procurement, contracting, and supplier review practices across the Group.

To further enhance our reporting mechanisms, PTG will introduce an external whistle blowing and disclosure route in 2026. This will include a publicly accessible reporting form hosted on the Portman Travel Group website, enabling suppliers, customers, and members of the public to report concerns relating to modern slavery or human trafficking within our operations or supply chain. All reports will be handled in line with our whistle blowing procedures and commitment to confidentiality and non-retaliation.

As a future plan to mature and reinforce accountability throughout the value chain, we will also review the requirement for a more targeted education of procurement and buying teams on modern slavery-specific contractual flow-down clauses, to support greater visibility of how our expectations are applied through subcontractors and lower-tier suppliers.



# Future commitments

## Measuring progress against commitments

Progress against these commitments will be monitored through Portman Travel Group's established governance and risk management arrangements. Key milestones, supplier coverage, and implementation outcomes will be reviewed periodically by the Governance, Risk and Compliance (GRC) Committee and reported through the Enterprise Risk Management framework. Where appropriate, progress will be reflected in annual Modern Slavery Act reporting, supporting transparency, accountability, and continuous improvement in our approach to preventing modern slavery and human trafficking.



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