

Travel Counsellors' Community Sustainability Policy

Policy Statement

This Community Sustainability Policy details Travel Counsellors' commitment to sustainability.

It defines the guiding principles that inform how our global community operates and how we make decisions, ensuring we create a culture that not only focuses on showing care to our people and our customers, but also to our planet, and the communities we travel to and work within.

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1. Introduction

Travel Counsellors is a global travel business founded on exceptional customer service and respect for our people and communities. Built on a franchise model, we empower people with a passion for travel to run their own travel businesses, taking care of the travel arrangements of more than 450,000 customers each year.

As a technology-enabled travel platform, we recognise that while we do not directly design or operate the travel products sold by our business owners, we play an important enabling role in supporting responsible travel choices and influencing positive change throughout our value chain.

Sustainable business practices are essential to the future success of our global company community and the wellbeing of our people and our planet. As a company community that has care at its heart, we're on a mission to better support our Travel Counsellors in creating responsible travel plans for their customers. This means choosing travel that supports host communities, respects local people and wildlife, and contributes to the industry's transition to a lower-carbon future.

As a digital platform, that holds the personal data of Travel Counsellors, customers, suppliers and partners, we take our responsibilities towards the safety of that data extremely seriously and we are committed to complying with all laws and requirements around data privacy and cyber security.

We are also committed to improving the day-to-day operations of our business in order to minimise greenhouse gas emissions, manage our waste responsibly, and operate ethically. To help us with this, we have engaged with the Travelife Sustainability System.

This policy sets the standards that inform how we operate, our commitments, our requirements from suppliers and partners, and our sustainability governance from both a legal and ethical perspective. These standards help us create a culture that respects our people and customers, the planet and the life it supports, and the communities we travel to and work within.

Our sustainability objectives

Our objective is to become the preferred platform for travel entrepreneurs seeking to build a sustainable travel business by:

- Continuously reducing the carbon intensity of our own operations
- Partnering with more suppliers who share our values around sustainability and ethical practices
- Highlighting responsible travel choices that minimise environmental impact and work to better support host communities
- Educating Travel Counsellors, customers and colleagues on the importance of sustainability in travel
- Providing Travel Counsellors and customers with the information to support informed and responsible travel decisions
- Ensuring we take all necessary steps to safeguard the data of our Travel Counsellors and their customers

Our values

Care

Entrepreneurial

Human

Impact

2. Definitions

- Company: Travel Counsellors Limited
- Travel Counsellor: Corporate or leisure travel business owner
- Colleague: Member of our global support team
- Supplier partners: Providers of products and services for our customers and/or support centres

3. Audiences

This policy applies to Travel Counsellor business owners, the company's Colleagues, and our network of supplier partners. It is also available to our leisure customers and corporate clients to support their own sustainability journeys.

This reflects our belief that Travel Counsellors can be catalysts for more sustainable travel choices across the industry.

4. Environmental Stewardship

Our operations

- Managing our carbon footprint

We are committed to reducing the carbon footprint associated with our operations. To achieve this, we will measure our carbon footprint annually, monitoring key data points such as electricity and gas consumption, commuting, and business travel. In addition, we will engage with our key suppliers to review their associated carbon emissions. We believe that by setting high standards for ourselves, we inspire our Travel Counsellors, Colleagues and customers to do the same.

- Energy consumption

We strive to minimise our consumption of energy through adoption of energy-efficient practices across all of our support centres ranging from equipment switch-off processes through to motion sensor lighting and adjustments to building management systems. All qualifying electronics purchased must meet a minimum requirement for energy efficiency with ENERGY STAR® certification. We also focus on digital efficiency in the selection of our cloud partners, ensuring that they have strong sustainability practices.

- Waste and water reduction

We apply the waste hierarchy of reduce, reuse, recycle, and recover in all our support centres. We are actively cutting down on single-use plastics by providing drinking taps or water tanks and implementing water-saving measures.

Our travel products

- Sustainability-certified products

We offer a wide range of accommodation options for customers. For those that have achieved sustainability certifications with standards recognised by the Global Sustainable Tourism Council, we mark them with a Green Leaf label in order to help customers make better informed decisions. We are working with sustainability certification company, *Green Tourism*, and our closest accommodation partners to drive standards in the industry and help more accommodations become certified.

- Biodiversity and wildlife

Our business, and our sector, has a critical role in protecting animals, biodiversity and nature, supporting local livelihoods, and encouraging environmental stewardship. Effective application of our Animal Protection Policy and guidelines help empower the Travel Counsellor Community to achieve our objectives and ensure we work towards a positive future for nature.

- Carbon emissions data

Travel and tourism accounts for roughly 8% of global carbon emissions therefore we understand the need for the industry to decarbonise. We provide corporate clients with post-travel carbon data through our *myTC Insights* management information platform, and carbon estimates on flights during the planning process to highlight where lower carbon carriers are available. We aim to expand this to bring carbon data across more of our products to help customers take an active role in reducing their carbon footprints.

5. Our Responsibility Towards Our Customers

Data Protection and cybersecurity

Protecting customer data is fundamental to our business and our principles. We adhere to ISO 27001 standards and comply with UK GDPR and other applicable data protection legislation. In line with these principles, we seek to abide by the rules on data minimisation, retention and consent, ensuring all personal data is collected and used responsibly.

As we expand the use of technology, analytics and AI tools, we are committed to maintaining the highest standards of cybersecurity, data privacy, transparency and ethical use of data.

Transparency and communication

We endeavour to provide clear, honest product information and pricing without hidden fees, ensuring customers know exactly what they are paying for. We strive to avoid greenwashing, by communicating openly about our sustainability efforts and those of the travel products we promote, and to provide customers with the information to make informed decisions. Our marketing aims to be inclusive, representative and culturally sensitive.

6. Social Responsibility

Our people

- Diversity, equity, and inclusion

Travel Counsellors is committed to nurturing a culture of care and belonging for all colleagues and Travel Counsellor business owners, creating an inclusive and diverse global community.

Our responsibility to each other and our customers is brought to life in a number of ways that work to ensure our people feel safe, welcome, considered and cared for. Highlights include sustained work to drive forward our commitment to Diversity, Equity and Inclusion, demonstrated through the

company's DE&I Positive Action Roadmap, community insights and engagement with global benchmarking programmes. Included within our DE&I strategy is our Care Hub (launched 2025), along with ongoing efforts to further embed our 'TC Affinity' groups (run by our community, for our community), bringing together colleagues and business owners to champion themes such as sustainability in 'TC Sustain', and accessible travel in 'TC Ability'.

- Ethical employment

Our people are at the heart of our success. We provide a fair and ethical working environment, with competitive pay, regular pay benchmarking, and transparent bonus schemes. In addition to enhanced parental leave policies, we ensure that all Colleagues feel supported and valued in their work.

- Training and development

Lifelong learning is essential to us. We ensure that all our people have access to professional development through targeted training and continuous growth opportunities, helping them reach their personal best.

- Wellbeing

At Travel Counsellors, we care deeply about the wellbeing of our people. Our Care Hub and Global Community Wellbeing Strategy provide comprehensive support across five core areas of wellbeing (mental, physical, financial, social and career), from personal counselling services and investment in our Mental Health First Aiders programme, to financial wellbeing sessions. Supporting our people's wellbeing is essential to creating a positive, productive workplace.

- Development

Regular engagement surveys listen, learn and respond to our peoples' needs or concerns, with an annual learning needs analysis tuned to react to development requirements. Our early careers strategy (Investing in Tomorrow's Talent Today) includes dedicated support for new graduates, BTEC students and apprentices, as part of a business community that prides itself on empowering people to be the very best they can be.

Community engagement

- Supporting local communities

We're committed to developing our community's understanding of how the travel plans we create can contribute towards social and economic development in host destinations across the globe. We feature training on this essential theme.

We will also look for opportunities to collaborate with local organisations and support community initiatives through philanthropic activities, including our long-term support of the charities, Reuben's Retreat and the Travel Foundation.

- Cultural respect

Travelling responsibly includes understanding and respecting the cultures, religions, and traditions of the places we visit. We aim to educate our customers on how they can engage respectfully and responsibly with local communities, promoting cultural appreciation over exploitation.

7. Supplier Partners

Supplier Code of Conduct

We expect all our suppliers to adhere to a robust code of conduct that aligns with our values on sustainability, human rights, and business ethics. We are committed to collaborating with partners to drive improved standards throughout the industry from environmental management and animal protection to anti-corruption policies. Our Supplier Code of Conduct outlines the expectations for ongoing compliance and monitoring.

Travel Counsellors may take steps to verify compliance with this Code of Conduct at any time on reasonable notice. Supplier partners must provide all reasonable co-operation with any investigations or audits carried out by Travel Counsellors or third parties engaged on its behalf. Supplier partners are expected to take all necessary corrective action to remedy any non-compliance with this Code of Conduct promptly and within any reasonable time period specified by Travel Counsellors. In cases of non-compliance with this Code, we reserve the right to take appropriate steps, which may include reviewing or terminating our agreement with the supplier partner, where we are contractually able to do so.

Sustainability standards and product offerings

We encourage our suppliers to adopt more sustainable practices and offer them free access to training as part of the *Travelife* platform. We're also actively looking to bring in new sustainability-focused suppliers, ensuring that our customers have access to products that are working to achieve better environmental and social outcomes.

8. Sustainability Management at Travel Counsellors

Governance

We have appointed a dedicated Sustainability and Impact Lead to oversee the implementation of this policy. The Sustainability and Impact Lead works closely with the Executive Team and ESG Committee to identify, monitor progress and review the company's material sustainability key performance indicators (KPIs).

The Sustainability and Impact Lead is responsible for ensuring that material sustainability KPIs are measured and monitored on an ongoing basis, that progress against those KPIs is reviewed periodically with the Executive Team and ESG Committee, and that relevant sustainability metrics are reported internally to support oversight and continuous improvement. This governance framework ensures that the company's sustainability commitments remain a priority and are subject to regular monitoring and review.

Ethics and compliance

We operate to the highest standards of integrity and transparency. We have zero-tolerance for corruption, bribery, forced labour, and discrimination. Our Speak Up and Ethics policies support our

commitment to conducting our business with honesty and integrity, nurturing a culture of openness and accountability in a responsible and transparent way.

Regulatory compliance

Travel Counsellors is committed to meeting all applicable local, regional, national, and international regulations relating to human resources, human rights, children's rights, land rights, environmental management, wildlife, and land use, and we continually work to ensure our practices align with these standards.

Policy Review

This Community Sustainability Policy is reviewed annually to ensure it remains aligned with changing regulations and internal goals. We seek to ensure that all areas of the business comply with the policy, and updates are made as necessary to reflect progress in our sustainability journey.

For questions or feedback, please contact our Sustainability and Impact Lead at sustainability@travelcounsellors.com.

9. Conclusion

We believe that championing sustainability is a responsibility for everyone in our company community. Through this Community Sustainability Policy, we commit to integrating sustainability into our day-to-day operations and supporting our Travel Counsellors to create more sustainable travel plans for their customers.

Our ultimate aim is to redefine what personal means in the travel industry. Our Community Sustainability Policy ensures we can continuously work towards this whilst showing care to our people, our customers, and those who live and work in the communities we travel to.

Steve Byrne

Chief Executive Officer

Dated: 9 January 2026