

Statement from our Chief Executive Officer

Here at Travel Counsellors, we put people at the centre of everything we do and that includes how we support our business owners, colleagues, customers and our wider community. We would not be able to achieve this core purpose without the support of our valued supplier partners.

It is our duty of care to only work with partners that have the same commitment to operate in a responsible way and ensure that our impact is a positive one. We are committed to working with supplier partners who share our values and will work in partnership with us to achieve this.

With your support and that of our other valued partners, we are incredibly proud of the reputation we have built, based on nurturing personal, trusted relationships with our customers and we take the same approach with our supplier partners in order to deliver the highest standards of service and care. As such, we expect the behaviours and practices of our partners to align to these standards, including those in the travel product supply chain and organisations that provide other services to the business, reflective of our duty of care as a customer focused company.

This Code sets out the minimum standards that we expect from our suppliers. Furthermore, we feel passionately that we and our supplier partners should strive for continuous improvement in our corporate responsibility programmes. A commitment I am sure that we share as we work together to strengthen and, in some cases, re-build our respective businesses over the coming years.



Steve Byrne, Chief Executive Officer

Supplier Code Of Conduct

All suppliers are expected to meet the requirements of this Code in order to supply goods or services to Travel Counsellors.

Suppliers must enforce these standards across their supply chain. A written contract on equivalent terms to this Code must be entered into with all suppliers.

1. Fundamental principles and rights at work

We expect our suppliers to comply with the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and for all staff contracted by our suppliers to be formally hired and provided with contracts that are clear to outline the conditions of employment including remuneration.

a. Freedom from child labour

All workers must be age 15 or above, or if local standards are higher, beyond the age for compulsory education and at least the minimum age for entry into work.

b. Freedom from forced labour

The use of forced labour in whatever form will not be tolerated by Travel Counsellors. All work must be voluntary and in compliance with the anti-slavery and human trafficking requirements in section 6 of this Code. Furthermore, preventative measures must be undertaken to ensure that children are protected from tourism-related sexual exploitation and all potential forms of abuse or exploitation.

c. Freedom to organise and bargain collectively

All workers must be free to establish and to join trade unions in order to promote and defend their interests, and to bargain collectively without interference or intimidation.

d. Freedom from discrimination in employment and occupation

All workers must be treated fairly. No worker will be discriminated against on grounds of age, gender, marital status, pregnancy, disability, race (including colour, nationality, ethnic or national origin), religion or belief, sex, sexual orientation, or other. No worker will be subject to any form of harassment or victimisation.

e. Fair wages & benefits

All workers must be paid a fair wage which reflects prevailing industry standards, or the minimum wage, whichever is the higher. Deductions from wages not provided for by law shall not be permitted.

f. Working hours

No worker will be required to work more than the legal maximum hours permitted by the law of the country where they are employed. All overtime must be voluntary and shall be fairly compensated.

g. Discipline & grievances

All disputes with workers arising during the course of the working relationship must be dealt with by means of fair, consistent and transparent procedures, so that decisions are fair and objective. Issues must be promptly dealt with, and workers treated with respect and understanding at all times.

2. Environment

We expect our suppliers to manage their supply chain and business with the aim of protecting the environment, including ensuring compliance with all applicable environmental legislation and making reasonable efforts to meet industry best practices and standards with respect to the reduction of energy use, greenhouse gas emissions, waste, and water use. Suppliers must also ensure that potential impacts to community health, safety, and security – such as accidents, impacts on natural resources, exposure to pollution or other community issues, that may arise from business operations are appropriately, prevented, mitigated, and managed. This includes ensuring that operations do not jeopardise local access to basic services such as food, water and energy.

We expect tour leaders, local representatives and guides, where relevant, to inform customers on relevant sustainability matters in the destination, such as restrictions on resource usage, social norms and values.

3. Animal experiences

We expect our suppliers to support us in complying with our legal obligations and suppliers shall undertake appropriate due diligence in relation to any experiences involving animals that they make available. Suppliers shall not permit the sale of any animal experiences where the supplier suspects or it could reasonably be expected that the animals are subjected to any prohibited practices.

4. Health and safety

Suppliers must provide a safe environment which protects the health, safety and welfare of their workforce and the wider public including, but not limited to, customers of Travel Counsellors. Suppliers must have in place an appropriate safety management system in compliance with all health and safety laws and regulations and industry good practice applicable to their business.

5. Compliance with laws

Suppliers must comply with all applicable laws, statutes, regulations and codes in the countries in which they operate (“**Laws**”).

This includes, but is not limited to, the Laws relating to:

- slavery and human trafficking;
- anti-bribery and corruption;
- money laundering
- engagement with any sanctioned entities or individuals; and
- tax evasion, or the facilitation of tax evasion
- promotion or sale of illegal souvenirs including those that contain threatened flora and fauna species as indicated in the CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) treaty

(together the “**Prohibited Activities**”).

Travel Counsellors has a zero-tolerance approach to any involvement in Prohibited Activities.

We expect suppliers to have a robust and effective programme of compliance in place in line with good industry practice to counter any Prohibited Activities. As a minimum this must include:

Effective procedures and controls to detect and prevent any occurrences of Prohibited Activities within a supplier's organisation or wider supply chain. These must be clear, accessible, effectively implemented and enforced.

Clear top-level commitment from within the supplier's organisation to a zero-tolerance approach to Prohibited Activities with appropriate oversight and policies in place.

Robust risk assessment process to closely monitor the supplier's exposure to the risk of Prohibited Activities occurring and ensure that all necessary actions are taken to avoid, mitigate or remediate those risks as appropriate.

Careful due diligence and monitoring of the supplier's own supply chain so that only partners meeting the standards detailed in this Code are onboarded, and any potential occurrences of the Prohibited Activities within a supplier's supply chain are promptly addressed.

Regular communication and training activities to ensure that procedures and policies are embedded and understood throughout the supplier's organisation.

Accessible whistleblowing facility for all personnel, contractors, and third parties with whom the supplier has a business relationship with (such as customers, suppliers and agents) to raise concerns and report instances of potential non-compliance in full confidence and without fear of retaliation.

Scheduled monitoring and review to ensure that compliance measures remain adequate in light of the changing risks with a view to continuous improvement. Proactive auditing must be carried out by the supplier as part of this process.

6. Modern slavery

Suppliers must take all steps necessary to ensure that their operations are free from slavery, servitude, forced and compulsory labour, human trafficking and any other practice that involves depriving any person of their liberty or freedom in order to exploit them for personal or commercial gain ("**Modern Slavery**").

We expect all suppliers to adhere to the following standards:

- Ensure appropriate rigour in recruitment processes to prevent Modern Slavery.
- Ensure all staff clearly understand the signs and indicators associated with Modern Slavery, are aware of the risk areas within their organisation, and are trained to report on sight.
- Ensure robust due diligence and monitoring processes in respect of its supply chain so that any risks of Modern Slavery are identified early and immediately addressed.

7. Anti-bribery and corruption

Travel Counsellors always acts with integrity in its business dealings, and we expect the same from our suppliers.

All suppliers must conduct business fairly, honestly and transparently. Under no circumstances should a supplier or persons associated with its business, request, offer or accept any bribes, kickbacks or anything else that may be viewed as an attempt to improperly influence business decisions ("**Bribes**").

We expect all suppliers to have in place anti-corruption and bribery procedures designed to prevent offences of bribery or corruption.

Suppliers are responsible for ensuring that all employees or persons associated with their business:

- Do not make, offer or accept Bribes, whether directly or indirectly.
- Do not make or offer any improper payments of money or anything of value to government officials, political parties, candidates for public office or other persons.
- Do not request, offer or make facilitation payments to obtain or speed up a routine procedure.
- Do not make, offer or accept gifts or entertainment beyond those offered openly in the normal course of business for the purpose of maintaining good relations and never to improperly gain a business advantage.
- Ensure that charitable donations are not dependent on, nor made to win, a business deal. Money must be given to the organisation and not an individual. Sponsorships must be made for the benefit of the business and not used as cover for Bribery.

Suppliers must have in place strong internal controls which are capable of exposing irregularities, including but not limited to, keeping accurate books and records which show all financial dealings.

8. Money laundering

Money laundering is the process of possessing, using, concealing, or exchanging for goods or services, money or other property originating from any criminal conduct.

Suppliers must not engage in or facilitate any money laundering or suspected money laundering and must have in place strong internal controls and processes to expose potential vulnerabilities to money laundering. Suppliers must promptly notify the relevant authorities of any money laundering suspicion.

9. Sanctions

Suppliers have a responsibility to ensure that they, and those within their supply chain, fully comply with applicable sanctions regimes (for example, United Nations, EU, UK and OFAC sanctions) and that they do not transact with any sanctions targets whether they are countries, entities or individuals. We expect all of our suppliers to adopt and maintain appropriate processes to ensure compliance with applicable sanctions regimes, and to ensure that these remain reflective of updates to sanctions lists and sanctions targets.

10. Competition

Open and fair competition is good for consumers and good for business. We expect our suppliers to act in full compliance with applicable anti-trust and competition laws. For example, suppliers should never propose or enter into any agreement with a competitor to fix margins, prices or contractual terms, or to divide up the market in any way.

11. Tax evasion

Tax evasion is when a person knows he or she has an obligation to account for tax but dishonestly does not do so. Tax evasion deprives governments of the revenues they need to provide vital public services.

Under no circumstances should suppliers, or persons associated with their business, take any steps with a view to engaging in tax evasion or facilitating tax evasion on behalf of others. As such, suppliers must put in place effective controls to prevent and detect tax evasion and its facilitation, and provide appropriate training, support and whistleblowing procedures to ensure their personnel recognise the signs of tax evasion and immediately report any concerns.

12. Conflict of interest

When doing business with us, we expect our suppliers to inform us of any potential conflicts of interest between us. For example, suppliers should let us know if there is a personal connection between people in our respective organisations who are involved in a contract or transaction, and/or whether such individuals have any outside business interest or monetary or other incentive to conduct a transaction or negotiation in a certain way.

13. Compliance

Travel Counsellors may take steps to verify compliance with this Code at any time on reasonable notice. Suppliers must provide all reasonable co-operation with any investigations or audits carried out by Travel Counsellors or third parties engaged on its behalf.

Suppliers are expected to take all necessary corrective action to remedy any non-compliance with this Code promptly and within any reasonable time period specified by Travel Counsellors.

Travel Counsellors reserves the right to terminate an agreement with any supplier that does not comply with this Code.

14. Reporting

Should suppliers become aware of any actual or potential violation of this Code of Conduct or any other unethical situation, they are encouraged to report to Travel Counsellors at legal@travelcounsellors.com. Alternatively, suppliers can report any suspected or actual failure to comply with this Code via our **Speak Up Portal** [here](#). This service is administered by Navex Global not Travel Counsellors, so impartiality and confidentiality are assured.