

INTERNOVA TRAVEL GROUP

Anti-Slavery and Human Trafficking Policy

PURPOSE

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Travel Leaders Group Holdings, LLC dba Internova Travel Group and its subsidiaries ("Company") has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships. The Company is committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015 (the "Act").

SCOPE:

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, independent travel advisors, and consultants.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners.

This policy does not form part of any employee's contract of employment and we may amend it from time to time.

POLICY

Modern slavery is defined as slavery, servitude, forced or compulsory labour and human trafficking. Modern slavery is a complex and often hidden crime that crosses borders, sectors and jurisdictions.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour.

The Company accepts that it has a responsibility through practical and reasonable due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

While not all sections of the Act are directly applicable to the Company, we have committed to perform the following to meet stakeholder expectations:

- Prepare and publish a policy statement in accordance with Provision 54 of the Act – Transparency in Supplier Chains.
- Set same standards and expectations for our suppliers, contractors and other business partners, through contractual processes and/or third-party assessment reviews.
- Regular review of applicable policies and procedures to include references to modern slavery.
- Training as necessary and bringing awareness on this topic to our employees.

Responsibility for the policy

The Senior Executives have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

The Human Resources department has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems and policies and procedures, to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager immediately.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or your Human Resources representative.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or any of its supply chains.

Training and communication

Regular training on this policy and the risk that the business faces from modern slavery in its supply chains will be provided as necessary to educate on how to identify exploitation and modern slavery and how to report suspected cases.

You may learn more about Modern Slavery by visiting <https://www.gov.uk/government/collections/modern-slavery> or contact the UK Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

This policy will be reviewed annually by the Management Team and any changes will be communicated to staff accordingly. It is available on the Company's Human Resources employee website.

***** End of Policy*****