

Intrepid Group Modern Slavery Statement 2019

Note: This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (UK) and constitutes our Modern Slavery Statement for 2019.

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its operations and its supply chain.

At [Intrepid Group](#), we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have chosen to understand all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking during the financial year 2019. This Statement is Intrepid Group's third Modern Slavery Statement and corresponds to our [previous statements](#) and our [Global Human Rights Policy](#).

1. Our business

Independently owned by the founders of Intrepid Travel, Intrepid Group is a collection of three tour operator brands and 25 destination management companies (DMC) united by the vision of Changing the Way People See the World. For more than 30 years, Intrepid has been taking small groups to travel the local way, on real-life experiences that give back to the places and people we visit. We are the world's largest provider of sustainable, experience-rich travel. Carrying over 460,000 passengers a year, our brands offer over 2,700 itineraries in 120-plus countries across every continent, catering for all ages, budgets and appetites for adventure.

As a responsible travel business, Intrepid Group is committed to:

- Respecting the destinations we operate in
- Supporting local people
- Preserving the environment
- Protecting the rights of the most vulnerable
- Giving back to local communities

With more than 2,399 employees, contractors and freelancers in 44 offices globally. As a vertically integrated business, we have operational offices called PEAK Destination Management Companies (PEAK DMC), which operate most of our itineraries. The vertically integrated company enables us to manage our operations and have greater

oversight of our supply chain, as well as identify and mitigate risk areas of modern slavery and trafficking within our business. The Intrepid Group [Integrated Annual Report for 2019](#) provides further details on our governance structure.

2. Our supply chain

Our supply chains include various forms of capital (human, financial and physical), and goods and services. As an adventure travel company, our people (human capital) are our greatest assets. Financial capital enables us to grow our business, while physical capital includes our 44 offices.

We require goods and services for our global offices (DMC, sales offices and virtual home and co-working offices) and to support our customers on trips, including travel management, technical and personal protection equipment, office and IT equipment, facilities and maintenance providers as well as specialist support from subcontractors.

We acknowledge the challenges of respecting human rights throughout our supply chain and are committed to working with our suppliers and business partners to adopt and follow principles and standards like our own.

3. Risk management and due diligence processes

This Statement on Modern Slavery outlines how we work to prevent, identify and mitigate incidences of modern slavery, which encompasses forced labour and wage exploitation, involuntary servitude, debt bondage, human trafficking, forced marriage and other forms of exploitation.

Intrepid Group has implemented the COSO Enterprise Risk Management – Integrated Framework to manage its global risk. We use a multi-layered approach to the identification, management and mitigation of external and operational risks. Risk governance is led by Intrepid Group's Board, which actively participates in the 'top-down' identification, assessment, acceptance and mitigation of strategic risk. The internal audit and risk committee will be consistently reviewing this statement and ensuring the Intrepid Group meets its requirements.

Recruitment and Employment

We comply with the policies set out in our Employee Handbook, as well as:

- all legal obligations in the recruitment and on-boarding process focusing on a potential employee's right to work in the relevant country in which they will be engaged;
- conduct the appropriate level of due diligence on our prospective employees before them joining Intrepid Group, including a robust selection process and checking employment references; and
- we recruit, promote and develop our people on the grounds of merit and capability alone and ensure diversity and inclusion.

We also ensure we follow ethical principles of employment by conforming to the minimum wage requirements for employees (e.g. the London living wage for London employees).

Global Supplier Benchmarking

Our Peak DMC network track the quality, service and performance of existing suppliers. This procedure allows us to evaluate suppliers regularly and identify and mitigate any issues related to compliance with our Supplier Code of Conduct, see policy section below for more details on the Code.

Traveller Feedback

Every customer is emailed our online feedback form after the end of their trip. We ask customers whether their journey was operated responsibly and provide scope for customers to add comments. This feedback is collated by our Peak DMC Global team every month and reported back to the broader business. Customer comments that indicate there may have been a breach in our responsible travel practices are followed up by Peak DMC Global and investigated by the Peak DMC office where the complaint occurred.

Leader Trip Report

All our tour leaders must prepare a trip report that they send to their manager within 48 hours of completing each tour. Included in this report is a section where a leader can document the practices of our suppliers (accommodation, transport providers, restaurants and other businesses). It is a mechanism for us to identify and mitigate any potential risks from within our supply chain.

4. Our Policies

The following policies and guidelines assist our staff and suppliers in ensuring we are operating responsibly and protecting human rights throughout our operations.

Intrepid Group Code of Conduct

We are committed to obeying the relevant laws governing operations in all countries and regions in which we do business. Intrepid Group Code of Conduct guides staff in identifying and overcoming ethical and legal challenges in day-to-day working life and provides a basis for dealing with conflict.

Supplier Code of Conduct

PEAK DMC, as part of Intrepid Group, is committed to sustainable, ethical business practices that obey applicable laws, conventions and regulations. The Supplier Code of Conduct conveys our expectations to our suppliers so they will support ethical practices. All suppliers sign the Code and are required to demonstrate that they:

- Respect human rights and labour laws.
- Support local communities.
- Identify and monitor bribery and corruption risks.
- Identify and monitor negative environmental impacts.
- Introduce and maintain quality assurance policies and procedures.

- Introduce and maintain health and safety policies and procedures.

Leader and Crew Conduct Policy

This policy provides clear guidance to all leaders and crew operating Intrepid Group trips on conduct that is deemed inappropriate and would result in termination of their employment. Such behaviour includes compromising the leader or crew's duty of care to passengers, failing to follow Intrepid Group's core values, or breaching local laws and other acts of misconduct.

Prevention of Bribery and Corruption Policy

Our company culture reflects the value we place in acting with integrity and being socially responsible. Accordingly, we are committed to conducting business fairly, openly and honestly. We inherently oppose bribery and corruption. We recognise that these inappropriate ways of doing business are evident and are a cause of hardship and crime in several countries in which we operate.

Laws in several countries (UK Bribery Act 2010, US Foreign Corrupt Practices Act 1977, AU Criminal Code [Bribery of Foreign Officials] 1999) hold Intrepid Group's companies, staff and suppliers accountable for preventing bribery and corruption anywhere in the world in which we do business. The Prevention of Bribery and Corruption Policy confirms our commitment to comply with these laws and outlines actions to be taken by all companies within Intrepid Group to achieve this aim.

Prevention of Discrimination, Bullying and Harassment Policy

The Prevention of Discrimination, Bullying and Harassment Policy confirms that Intrepid Group does not condone any form of discrimination, bullying or harassment in the workplace, and will act to stamp out any such behaviours reported to management or human resources. The policy outlines the rights, responsibilities and our expectations of all staff regarding preventing discrimination, bullying and harassment to create the workplace we all want. This policy applies to all employees, contractors, temporary staff, volunteers and visitors of all Intrepid Group companies.

Whistleblower Policy

The Whistleblower Policy provides individuals with a means to report any concerns regarding malpractice, wrongdoing or illegality to the company's attention. The confidential nature of the hotline allows individuals to lodge a report without fear of reprisal or intimidation. The business investigates concerns raised through the confidential hotline process and rectifies them where necessary. The Whistleblower Policy establishes the framework and procedures for this system.

This policy applies to all permanent and temporary employees of Intrepid Group companies. It also applies to freelance leaders and crew, external consultants, contractors and agency personnel while providing services to Intrepid Group companies.

Purchasing Policy

Each year Intrepid Group spends a substantial sum of money purchasing goods and services in the countries we operate in. With this purchasing power comes responsibility. The purchasing decisions we make have a real impact, not only on our business but on the environments and communities in which we operate. The Purchasing Policy aims to ensure that we create positive impacts while still serving the operational needs of the business.

Responsible Travel Policy

Our Responsible Travel Policy outlines our principles for travelling responsibly: to ensure that our operations respect local destinations, preserve the local environment, and protect wildlife and the rights of the most vulnerable, while also giving back to the places we travel. We train our staff across the business on our Responsible Travel policy and supporting guidelines.

Global Porter Policy

Intrepid Group is committed to ensuring respectful and fair working conditions for all trekking porters. This policy was updated in 2018 to include specific local porter regulations at our PEAK DMC offices in Nepal, Peru and Kenya. We also introduced our Intrepid Group Kokoda Local Porter Regulation focusing on ensuring the fair treatment and welfare of our porters.

5. Summary of actions taken during the fiscal year ending 31 December 2019

Intrepid Group continues to be a strong supporter of ethical business conduct in our operations, supply chains and the international effort to abolish all forms of modern slavery. Below we describe the specific actions taken in the past calendar year and note our next steps on this topic planned for the calendar year ending 31 December 2020.

Training

We developed and implemented global modern slavery awareness training for all staff. The online training is compulsory. As of Dec 2019, 60% of staff had completed the training.

Awareness

We maintained an active involvement in industry forums and working groups to promote the elimination of slavery around the world and participated in several external engagements. Examples include:

- Presented on the topic of orphanage tourism at World Tourism Market 2019 in London, UK.
- Promoted the publication and participated in the Australian launch of the book, Modern Day Slavery and Orphanage Tourism.
- Continued to be on the steering group for Rethink Orphanages; and
- Created thought leadership content on voluntourism and orphanage tourism.

6. Our Next Steps for the fiscal year ending 31 December 2020

Risk Assessment

We will build on this foundational work to address modern slavery by conducting a desktop report to identify risk areas of modern slavery and trafficking within our business and recommendations for next steps.

Training

We will aim to achieve 100% completion of global slavery awareness training for all new and existing staff.

Awareness

We will maintain active involvement in industry forums and working groups to promote the elimination of slavery around the world.

Signed on behalf of the Board of Directors



James Thornton
Chief Executive Officer, Intrepid Group

Signed: June 2020 for the financial year 2019 (1 January 2019 to 31 December 2019)
for Intrepid Group.