

# **Eventurous Ltd Modern Slavery Policy**

# Our Statement on modern slavery and human trafficking

Eventurous Ltd is opposed to slavery, servitude, compulsory or forced labour and human trafficking (together, "Modern Slavery") in all its forms. Eventurous is committed to ensuring that no Modern Slavery takes place in any part of the business which Eventurous controls, or within its supply chain.

Our Anti-Modern Slavery Policy ("the Policy") reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that Modern Slavery is not taking place anywhere in our supply chains.

### Modern Slavery risk in the context of Eventurous business

In all jurisdictions in which Eventurous operates, its corporate activities are concerned with the provision of experiences to customers and ancillary or related services. Eventurous typically provides those services via its own staff and locally incorporated and managed companies. None of the jurisdictions in which Eventurous provides its services ranks highly on the Global Slavery Index.

Eventurous Ltd does not employ significant numbers of agency workers or contractors except for peak trading periods (during Christmas for example). The agency and contract workers are treated equally with our full time and permanent employees.

All employees, contractors and agency workers are required to adhere to the Policy. We aim to provide our staff members with guidance and actively encourage them to report slavery concerns using our Code of Conduct and Whistleblowing Policy.

### Modern Slavery risk in the context of Eventurous supply chain

Eventurous Ltd is committed to ensuring ethical compliance, to act with integrity in all our business relationships and to eradicate forced labour and human trafficking from within its supply chain.

Our supply chain includes suppliers providing activities and services in relation to the products on our website, professional service providers, consultants in the areas of legal, finance and marketing, utility providers, cleaning and waste management, IT equipment, office stationery supply companies, food and beverage for the consumption of employee's and guests. We take care to ensure that our suppliers do not fall under the high-ranking slavery index.

# **Response to Modern Slavery risks**

Eventurous has no cause to suspect that Modern Slavery is currently present within its business or supply chain, nor any evidence that it has been present in the past.

#### **Eventurous Ltd:**

- has in place a Code of Conduct and whistleblowing policy which enables employees and contractors to report illegal or unethical behaviour without fear of reprisal;
- has adopted a straightforward Anti-Modern Slavery Policy, which is primarily focused on obliging employees and contractors to report Modern Slavery and what to do if it is detected in Eventurous business or supply chain. Eventurous will keep this policy under review and update it periodically in line with UK Home Office guidance;
- will ensure that responsibility for continuing compliance with the Policy rests with a senior employee of Eventurous;
- will ensure a high level of understanding of the risks of Modern Slavery in our supply chains and our business by providing training, where appropriate, to our staff;
- engages in regular dialogue with suppliers of services, and in particular those involving any
  element of outsourced labour, and will adopt a risk-based approach to evaluating the risk of
  Modern Slavery with regard to existing suppliers and supply chains; and
- requires material suppliers of goods and services to undertake to comply with applicable laws, and where appropriate will include contractual clauses aimed at ensuring suppliers are prohibited from encouraging or engaging in Modern Slavery.
- will require new suppliers (or, where agreements are being renewed, existing suppliers) to adhere to them, and will conduct supply chain audits and ethical due diligence on new suppliers where any material risk of Modern Slavery has been identified.

## **Responsibility and Due Diligence**

The Board and senior management of Eventurous Ltd will take responsibility for implementing this statement and provide adequate resources and investment to ensure that Modern Slavery is not taking place within the business or its supply chains. We have developed a Code of Conduct through which we aim to achieve best practice. We will aim for all our supply chain to adhere to our Code of Conduct in future years. We will take steps to ensure due diligence.

If we find a supplier is non-compliant with our policies or code of conduct or provides inadequate information, we will work with them to improve their performance. In cases of persistent non-compliance, we may consider terminating the business relationship as soon as possible. Employees who do not follow the policy will be given the opportunity to receive additional training,

if their behaviour does not improve, they may face disciplinary action.