

Modern Slavery and Human Trafficking Statement – Swans Travel

This statement is made in accordance with Section 54 of the **Modern Slavery Act 2015** and outlines the ongoing actions taken by **Swans Travel Ltd** to prevent modern slavery and human trafficking within our business operations and supply chains.

Modern slavery is a serious and deeply concerning crime that includes slavery, servitude, forced labour, and human trafficking. Swans Travel maintains a **zero-tolerance approach** to any form of modern slavery. We are fully committed to operating ethically, with integrity and transparency, and to ensuring that our business practices reflect our responsibility to respect and uphold human rights.

Our Commitment

Swans Travel is committed to:

- Preventing modern slavery and human trafficking in all areas of our operations, including recruitment, supply chains, and third-party partnerships.
- Acting with fairness and integrity in all business dealings.
- Continuously improving our practices to identify and mitigate the risk of modern slavery.

Policies and Controls

To support our commitment, we have implemented a series of internal policies and controls, including:

- **Robust Recruitment Procedures:** All employees are recruited through fair and lawful processes. We conduct identity and right-to-work checks, and no worker is asked to pay recruitment fees.
- **Supplier Due Diligence:** We expect all of our suppliers and partners to adhere to ethical labour practices. We are working towards integrating anti-slavery clauses and due diligence requirements in our supplier contracts.
- **Whistleblowing Policy:** Our staff are encouraged to report any concerns, including suspicions of modern slavery, through a confidential reporting process without fear of retaliation.
- **Training and Awareness:** Key staff are provided with training to understand and identify the risks of modern slavery, particularly in procurement, HR, and operations.

Ongoing Monitoring and Risk Assessment

Swans Travel regularly reviews its practices and policies to ensure compliance with the Modern Slavery Act. We monitor areas of potential risk and are committed to strengthening our due diligence processes across the business and supply chains.

Future Steps

We will continue to:

- Review and enhance our policies to address evolving risks related to modern slavery.
- Improve engagement with suppliers to promote transparency and responsible sourcing.
- Provide additional training to raise awareness of modern slavery across the wider organisation.

This statement was approved by the Swans Travel Board of Directors and is accurate as of the date of publication. It will be reviewed and updated annually, or as required, to reflect any changes in legislation, business operations, or our approach to combating modern slavery.