

Modern Slavery Statement 2022

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About this statement

This statement is made by Intrepid Travel pursuant to section 54 of the *Modern Slavery Act 2015 (UK)* and the *Australian Commonwealth Modern Slavery Act 2018*, for the period 1 January 2022 to 31 December 2022 (the reporting period for FY22) and constitutes our *Modern Slavery Statement for 2022*. All figures are reported in Australian dollars, unless otherwise stated.

Acknowledgment of Country

Intrepid Travel acknowledges the Traditional Custodians of the lands on which we live and work. Our head office in Narrm/Melbourne is on the lands of the Wurundjeri People of the Kulin nation, but our people work and live across Australia and we pay our respects to Elders, past and present, of the lands that we work, live and visit. We acknowledge their continuing connection to waters, skies, seas and country.

INTRODUCTION

Modern slavery in context

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. The United Nations (UN) describes modern slavery as: "an umbrella term covering practices such as forced labour, debt bondage, forced marriage, and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power".

Modern slavery is a serious issue for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. According to the UN, more than half (52 per cent) of all forced labour can be found in upper-middle income or high-income countries. Every company is at risk of being involved in this crime through its operations and its supply chain.

In 2022, the International Labour Organization (ILO) and Walk Free, in partnership with the International Organization for Migration (IOM) released a report called *The Global Estimates of Modern Slavery 2022*. The report indicates that in

2021, there were almost 50 million people living in situations of modern slavery on any given day, either forced to work against their will or in a forced marriage. This is nearly one in every 150 people in the world. The problem is getting worse. The 2021 figures show about 10 million more men, women, and children in modern slavery situations since the last estimates in 2017.¹

There are significant links between tourism and modern slavery, both overt and covert. One of the most widespread is via tourists that visit or volunteer at orphanages as part of their trip, who are often unknowingly contributing to the exploitation of children. The most recent figures show that of the eight million children in orphanages around the world, 80% are not orphans², but are given up by their families and kept in poor conditions to elicit sympathy and financial support from tourists. More covert modern slavery activities take place in tourism supply chains, such as the use of child labour to make and sell souvenirs, or the high level of employment of migrant and ethnic minority groups in low skilled jobs, such as cleaning or hospitality.

The Australian Government is addressing the strength of legislation through a review of the [Modern Slavery Act \(2018\)](#) that commenced in March 2022. The Act requires businesses operating in Australia with an annual consolidated revenue of at least \$100 million to identify and address modern slavery risks in their global supply chains and operations. Reporting entities are required to submit annual modern slavery statements, which are published on the [Modern Slavery Statements Register](#). The review, scheduled to run for 12 months, will consider the Act's success over its first three years and whether further measures to improve compliance, and the Act itself, are necessary. This review is in accordance with the [National Action Plan to Combat Modern Slavery 2020-2025](#). The results of the review are due to be released in June 2023. Changes could include the appointment of an Anti-Slavery Commissioner at the Commonwealth level to sit alongside the Human Rights Commissioner, introducing penalties to improve compliance and strengthened due diligence in reporting.

¹ [Global Estimates of Modern Slavery 2022 | Walk Free, GEMS-2022_Report_EN_V8.pdf \(walkfree.org\)](#)

² [Travel, tourism and modern slavery – Save the Children Australia](#)

Globally, reporting requirements and regulation are increasing. In September 2022, the European Commission proposed new regulations to prohibit the importing or exporting of products made using forced labour, creating the most stringent product-related forced labour bans in the world.³ Further strengthening of legislative requirements is happening in other markets that Intrepid Travel operates in.

Canada has enacted the [Fighting Against Forced Labour and Child Labour in Supply Chains Act](#) and amended the [Customs Tariff](#). This will be enforced from 1 January 2024 with reports due by 31 May 2024. The reporting conditions will require Intrepid to submit a report. The Act requires companies to produce an annual report outlining the steps taken during the previous financial year to prevent and reduce the risk of forced labour or child labour at any step of the production of goods in Canada or elsewhere of goods imported into Canada.⁴

Intrepid's ambition and commitment to reducing modern slavery risk

At Intrepid, our purpose is to inspire, create, share and lead, experience-rich trips, which benefit both our travellers and the people and places they visit. To do this, we commit to a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

Through the adoption of the [Sustainable Development Goals \(SDGs\)](#), in particular SDG 8 (Decent work and economic growth), we are part of the global community that has committed to ending modern slavery, human trafficking and child labour by taking immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers.

This statement is Intrepid's fifth Modern Slavery Statement and corresponds to our previous statements and our Global Human Rights Policy. We have taken concrete steps to tackle modern slavery. This statement sets out the steps we have taken to address all potential modern slavery risks related to our business and to prevent slavery and human trafficking.

³ [European Commission Proposes Sweeping Regulation to Ban Products Made with Forced Labor | Ropes & Gray LLP \(ropesgray.com\)](#)

⁴ [Canada enacts legislation to fight modern slavery in supply chains | Canada | Global law firm | Norton Rose Fulbright](#)

SECTION ONE

Organisation and company structure

For more than 34 years, Intrepid Travel has been changing the way we all see the world by offering responsible, experience-rich travel that gives back to the places and people we visit. In 2022, Intrepid operated more than 1,150 adventures in 119 countries across all seven continents. Every trip – whether closer to home or further afield – is designed for customers to truly experience local culture and engage with communities.

Intrepid Travel remains committed to responsible business practices, including through:

- **RESPECTING THE DESTINATIONS WE OPERATE IN**
- **SUPPORTING LOCAL PEOPLE**
- **PRESERVING THE ENVIRONMENT**
- **PROTECTING THE RIGHTS OF THE MOST VULNERABLE**
- **GIVING BACK TO LOCAL COMMUNITIES**

Our business



As a vertically integrated tour operator business, Intrepid has operational offices called Destination Management Companies (Intrepid DMC), which operate most of our itineraries. Each operations office is led by a local General Manager, who lives in the country or region. This vertically integrated company model enables Intrepid to manage the majority of its own operations and have greater oversight of our supply chain. It also enables us to identify and mitigate risk areas of modern slavery and trafficking within our business.

Shareholdings and acquisitions

Intrepid owns or has a financial interest in other travel and media companies around the world.

- Wildland Trekking: US-based eco-conscious tour operator **(100% ownership)**
- Adventure.com: Our global media and storytelling platform **(100% ownership)**
- Chimu Adventures: Australian-based company offering polar expeditions **(67.5% ownership)**
- Haka Tours and ANZ Nature Tours: New Zealand inbound and domestic travel companies **(60% ownership)**
- JOOB (Jump Out Of Bed): Australian adventure tourism business and destination management company **(60% ownership)**
- CABN: Nature-based off grid cabin accommodation based in South Australia **(50% ownership)**

These businesses share a similar ethos of creating authentic travel experiences and working closely with local communities and are included in the scope of this report.

Intrepid Travel's [2022 Integrated Report](#) provides further details on our business and governance structure.



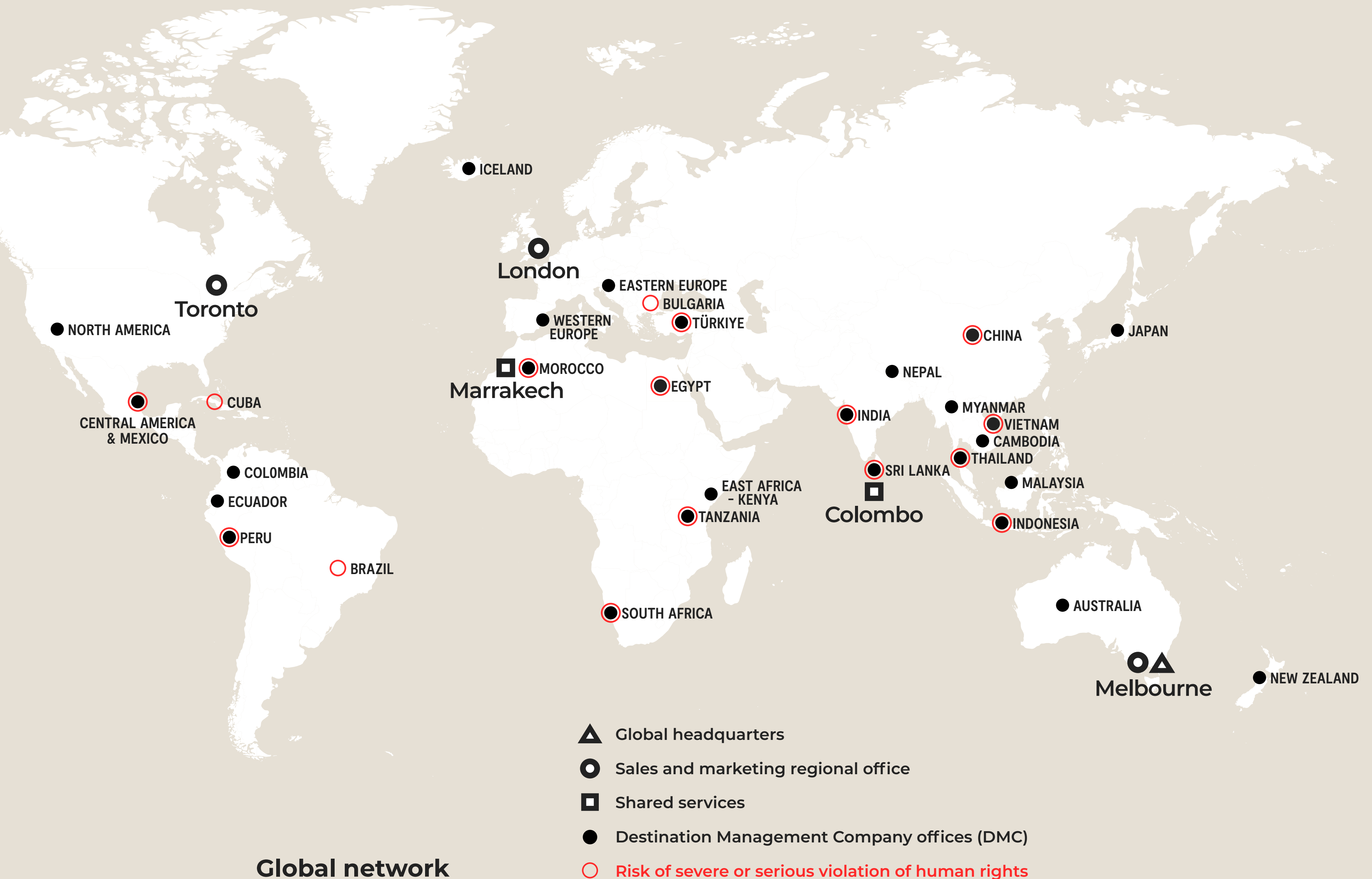
SECTION TWO

Supply chain

Intrepid’s supply chain is global and encompasses businesses that help us to operate our trips. This results in a diverse range of suppliers. During the 2022 financial year, Intrepid’s direct suppliers totalled 5,500.

Our supply chain includes various forms of capital (human, financial and physical), goods and services. As an adventure travel company, our people (human capital) are our greatest asset. Financial capital enables us to grow our business, while physical capital includes our offices. Our head office is in Melbourne, Australia, with regional offices in Toronto, Canada and London, UK – and we have 28 operational offices around the world.

Intrepid operates over 1,150 trips in over 100 countries, including in some of the highest risk countries for modern slavery, according to the [Destination Risk Map](#) created by the Roundtable Human Rights in Tourism.



We operate trips and have offices in three of the four countries that are at the most severe risk of human rights violations:

Risk of severe violation of human rights

COUNTRY	OFFICE/DMC	TRIP
China	●	●
Egypt	●	●
Vietnam	●	●
Venezuela	n/a	n/a

Additionally, we operate trips and/or have offices in 14 of the 18 countries that are at serious risk of a human rights violations:

Risk of serious violation of human rights

COUNTRY	OFFICE/DMC	TRIP
Türkiye	●	●
Indonesia	●	●
India	●	●
Thailand	●	●
Morocco	●	●
Sri Lanka	●	●
Colombia	●	●
Peru	●	●
Mexico	●	●
South Africa	●	●
Tanzania	n/a	●
Cuba	n/a	●
Bulgaria	n/a	●
Brazil	n/a	●
UAE	n/a	n/a
Tunisia	n/a	n/a
Maldives	n/a	n/a
Dominican Republic	n/a	n/a

In 2021, an analysis of Intrepid’s supply chain showed lack of aggregated supplier data and opportunities to improve visibility. We know that transparency in the supply chain is critical if we want to identify and support our suppliers in removing the risks of modern slavery. Improving transparency has supported the majority of the work that has been done in 2022, as referenced in [“Risk of modern slavery in our supply chain”](#) in section five.

We acknowledge the challenges of respecting human rights throughout our supply chain, specifically in destinations where protections for people may not be strictly implemented or respected. We are committed to working with our suppliers and business partners to adopt and follow principles that reflect our own commitment.

SECTION THREE

Risk management, monitoring and evaluation and due diligence processes

This statement on modern slavery outlines how Intrepid works 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 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’s Board, who actively participate in the ‘top-down’ identification, assessment, and acceptance of strategic risk. Intrepid’s Audit and Risk Committee will be regularly reviewing this statement and ensuring Intrepid meets its requirements.

Recruitment and employment

Intrepid complies with the policies set out in the company’s Employee Handbook. Additionally, we:

- directly recruit, select and hire our own staff and tour leaders.
- meet our own legal obligations in the recruitment and on-boarding process, focusing on a potential staff or tour leader’s right to work in the relevant country in which they will be engaged.
- conduct due diligence on our prospective staff and tour leaders prior to them joining Intrepid, including a robust selection process, and employment references.
- recruit, promote and develop our people on the grounds of merit and capability alone and ensure diversity and inclusion.
- provide staff and leaders with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear.
- workers are free to lawfully resign their employment without restriction or penalty.
- are committed to paying workers their legal pay entitlements, on time and provided with pay slips clearly showing how wages have been calculated and details of any deductions.
- do not deduct wages, impose monetary fines, and/or withhold pay or pay entitlements of workers for any reason.
- do not retain original identity related documents of workers, such as passports, national identity cards or birth certificates.
- do not require workers to lodge any security deposits such as financial or personal property, nor pay any recruitment fees to be employed by Intrepid.
- acknowledge all workers have the right to join or form trade unions of their own choosing, and to bargain collectively, without prior authorisation from management, according to national law.
- have policies and mechanisms in place to ensure that staff and tour leaders are not at risk of bullying, undue control, servitude, forced labour, human trafficking or exploitation.

We also ensure we follow ethical principles of employment by committing to living wage requirements for staff and leaders in all markets.

A living wage is the estimated lowest income required for a worker to afford a decent standard of living for themselves and their family.

It considers a worker's ability to afford clean drinking water and sanitation, decent housing, adequate clothing, infrastructure and tools if required to work, a nutritious diet, social services and be able to save. Earning a living wage lessens the likelihood of individuals becoming victims of forced or bonded labour or child labour.⁵

Each year, Intrepid conducts a remuneration review, analysing the salaries of staff and tour leaders to ensure these meet the living wage set for each location. Reputable living wage data is challenging to find for all our locations, and Intrepid uses a combination of online resources such as the [Employment Policy Institute](#) as well as purchased compensation information through Mercer and KornFerry.

In 2023, the remuneration review will be based on global living wage data purchased from [WageIndicator Foundation](#), a global, independent, non-profit organisation that collects, analyses and shares information on actual wages, minimum wages, living wages, and labour laws.

Global supplier benchmarking

The Intrepid DMC network and contracting team tracks the structure, quality, service and performance of suppliers. This procedure allows Intrepid to evaluate suppliers regularly and identify and mitigate any issues related to compliance with our Supplier Code of Conduct. See [Section four: Our policies](#) below for more details on the Code.

Customer feedback

Every customer is emailed an online feedback form after their trip. They are asked whether their trip was operated responsibly and are able to add comments. This feedback is collated by Intrepid's global operations 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 and investigated by the Intrepid DMC office where the complaint occurred.

Leader trip reports

All Intrepid tour leaders are required to prepare and send a trip report 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 suppliers (accommodation, transport providers, restaurants, and other businesses). It is a mechanism for Intrepid to identify and mitigate any potential risks from within our supply chain.

⁵ [A living wage: a crucial tool in the fight against modern slavery | Walk Free](#)

SECTION FOUR

Policies

The following policies and guidelines assist Intrepid’s staff and suppliers to ensure the company operates responsibly and protects human rights throughout our operations.

Global Human Rights Policy

Intrepid’s Global Human Rights Policy outlines our commitment to respecting internationally proclaimed human rights and ensuring the company is not complicit in human rights abuses. The policy outlines the rights, responsibilities and our expectations of all staff regarding the safeguarding of human rights. It explicitly condemns the use or support of any type of forced labour, including slavery, prison labour or labour enforced by intimidation, and our commitment to complying with the national laws on child labour and the minimum working age.

Code of Conduct

Intrepid is committed to obeying the relevant laws governing operations in all countries and regions in which we do business. The Intrepid 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

The Supplier Code of Conduct conveys our expectations to our suppliers that they will support ethical practices. All suppliers must 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.

Tour Leader and Crew Conduct Policy

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

Prevention of Bribery and Corruption Policy

Intrepid’s company culture emphasises the expectation to act with integrity and be 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 Travel’s companies, staff and suppliers accountable for preventing bribery and corruption anywhere in the world in which we do business. Intrepid’s Prevention of Bribery and Corruption Policy confirms our commitment to comply with these laws and outlines actions to be taken by all companies within the company to achieve this aim.

Prevention of Discrimination, Bullying and Harassment Policy

Intrepid's Prevention of Discrimination, Bullying and Harassment Policy outlines that we do 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 companies.

Whistleblower Policy

The Whistleblower Policy provides individuals with a means to bring any concerns regarding malpractice, wrongdoing, or illegality to the company's attention. The confidential nature of the reporting process allows individuals to lodge a report without fear of reprisal or intimidation. A Whistleblower committee investigates concerns raised and rectifies them where necessary.

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

Purchasing Policy

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

Declarations of Interest Policy

Intrepid requires all staff to declare if they hold an interest in, a position of power or gain over, or a personal relationship with, a business outside of Intrepid. An interest can be held personally or by a spouse or partner, a family member (children, parents, etc.) or close friend,

or through a company or trust. In order to gain complete visibility of our supply chain, which is critical to the management of our modern slavery risk, staff have a duty of care to declare their interest in a business within our supply chain.

Responsible Travel Policy

Intrepid's 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 and tour leaders on our Responsible Travel policy and supporting guidelines.

Global Porter Policy

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

SECTION FIVE

Summary of preventative actions taken in 2022

Intrepid is a supporter of ethical business conduct in our operations, supply chains and the international effort to abolish all forms of modern slavery.

Below are specific actions taken in the past calendar year and our next steps planned for the calendar year ending 31 December 2023.

Resourcing

In 2022, Intrepid created a new Global Social Impact Manager role. This is a full-time role and includes the responsibility for reducing the risk of modern slavery in our supply chain. The role was filled in September 2022. This increases the commitment and focus of Intrepid on improving policy, implementing programs and reporting.

Risk of modern slavery in our supply chain

Intrepid is a travel [B Corporation](#), a global certification for companies that have the highest verified environmental and social standards. Intrepid Travel re-certified in 2021. This recertification process included the establishment of baseline supply chain data on current human rights approaches, such as adoption of child protection guidelines by our suppliers.

The information gathered in 2021 formed the basis of a business case to create a supply chain management project in 2022, which includes managing modern slavery risks. The supply chain project was a company goal for 2022.

The project focused on creating awareness in our contracting teams and wider business of the need to engage and measure environmental, social and governance (ESG) practices of our supply chain, including human rights. A questionnaire was created and rolled out for suppliers to measure the impacts they make in the community, environment, and culturally, gauge ownership of diverse suppliers,

and determine the environmental practices and ESG certifications they have obtained. Data collection is ongoing and will be analysed in 2023.

In 2022, Intrepid formed a consortium with a global travel industry partner, Flight Centre, to measure the risk of modern slavery in both company's supply chain through the [Informed365](#) platform. This platform manages the distribution and response to supplier surveys about practices to reduce modern slavery risk, and disseminates improvement plans to suppliers where required. The platform can reduce the burden on suppliers of responding to multiple surveys by sharing the information to multiple consortium members. Intrepid and Flight Centre are founding members of the consortium, with a view to extending the consortium to include other travel businesses in the future.

Intrepid's B Corp certification requires the company to map living wages (where possible) for all countries where we employ staff. B Corps are required to meet living wage levels for all our employees globally, which we do through our annual Remuneration Review. B Corp also requires that we apply this lens to our supply chain and questions on wages and conditions are included in our supplier survey.

Accreditation – ChildSafe

In 2022, Intrepid signed a Partnership Collaboration Agreement with non-profit, [Friends International](#), to trial the ChildSafe Movement program in Intrepid’s Thailand office. The agreement is to implement the ChildSafe Good Practices Guidelines in operations in Thailand and measure progress annually with the support of Friends International. There are seven actions that must be met to be accredited as a ChildSafe partner. These are:

1. Arrange ChildSafe Awareness training for all company staff including contractual staff (i.e., freelance tour guides).
2. Refer and provide support for business supply chain to undertake ChildSafe Awareness training, including community-based tourism products (homestays, community experiences, etc.).
3. Adopt and implement a ChildSafe Code of Conduct for staff (and a child protection policy in some instances as advised by ChildSafe).
4. Adopt and implement ChildSafe communications and media guidelines.
5. Conduct a product review with a particular focus on avoiding visits and volunteering to orphanages and other child centres, including school classroom visits and child performances.

6. Distribute the *7 Tips for Travelers* campaign to all customers (digital or printed) and the supply chain.
7. Engage with and contribute donations to CSR activities/initiatives outlined in the ChildSafe CSR portfolio.

Intrepid will assess the roll out of the program once actions have been implemented, measured and reported on. Intrepid plans to complete the actions in 2023.

Training

Intrepid requires all new staff joining the business to complete human rights and modern slavery awareness training. The modern slavery training is delivered via Intrepid’s internal people portal and while not compulsory, it is continuously prompted for completion to new joiners. Of the 337 new staff onboarded in 2022, 89.6% completed the Modern Slavery and Child Protection training modules.

Training consists of the following modules:

- An explanation of modern slavery
- A link to our modern slavery Statement
- Our stance on child protection
- Intrepid’s Child Protection Guidelines

- An explainer on the ChildSafe program
- Why we don’t visit orphanages
- Why we don’t encourage travellers to give money to beggars

Partnerships

The [Blue Dragon Foundation](#) in Vietnam, works to help children escape from crisis through protection from sex trafficking, forced labour and slavery, and provides shelter, education, and employment.

Intrepid supports Blue Dragon through our not-for-profit, the Intrepid Foundation. In 2022, the Blue Dragon Marathon Walk was the Foundation’s most successful fundraiser, with \$165,125 raised.

Beyond the fundraising event, the Foundation also contributed a further \$8,413 to the Blue Dragon Children’s Foundation in the form of a donation.

The Intrepid Foundation also supported other organisations that work to protect children from exploitation through direct donations, including:

- [Forget Me Not](#), a non-profit in Nepal that aims to educate travellers about the dangers of orphanage tourism and reunite young people with their families.

- Friends International, a social enterprise that started in Cambodia but now works in other Asian countries to support children living on the streets to go to school or find employment, and enables families and communities to better care for their children.

Policy and governance updates

In 2022, Intrepid undertook a desktop audit of our vendors as part of an update to the company’s Commissions Policy. This prohibits tour leaders from accepting individual commissions from any vendor and guides our practices with retail suppliers.

As part of the research, we identified the textile and handicraft sector, including rug making in Nepal, India, and Pakistan, as an area at high-risk of forced labour and child labour and took steps to understand more and mitigate any risk that our interactions may cause.

The carpet and rug sector is a recognised area of risk for modern slavery. While accurate estimates are difficult to obtain, a 2014 study by the FXB Center for Health and Human Rights at Harvard University found approximately 900,000 forced labourers and approximately 400,000 child labourers in India’s carpet sector, which has a workforce of two million people.⁶

⁶ [Your Beautiful Indian Rug Was Probably Made By Child Labor \(forbes.com\)](#)

In India, Intrepid works with a preferred carpet seller, recommending them to customers if they would like to view and purchase carpets. We wanted to ensure that our preferred supplier was not selling rugs and carpets that were made under slavery conditions. As part of an audit, a senior business leader visited this seller and queried the supply chain of the carpets. She witnessed and recorded certification of their products, as part of the [Hallmark of Commitment for Child Welfare](#), issued by the Carpet Export Promotion Council which is set up by the Ministry of Textiles in the Government of India.

This audit connected us with ethical certification organisation [Good Weave](#), and fair-trade organisation [Step \(Fair Trade\)](#) in India, who provided guidance for updating our purchasing policy in 2022.

Industry advocacy

Intrepid engages in industry advocacy through membership of relevant industry groups, participation in forums and speaking engagements on relevant topics.

In 2022, this included:

- A session by the Roundtable Human Rights in Tourism with other UK and European travel organisations (attendance).

- ABTA (UK)'s Human Rights – Practitioners' Workshop: How to improve grievance management in the tourism value chain (attendance).
- The consultation sessions for the review of the Australian *Modern Slavery Act* with Professor John McMillan (attendance and contribution).
- A webinar by Baker McKenzie and environmental consultancy Ndver: "Modern slavery is increasing and regulations will tighten – how to be more effective now" (attendance).
- Meeting with [This is Eden](#), a not for profit that works on the front line to rescue victims of human trafficking and sexual exploitation in Myanmar (attendance and discussion).

We also maintain ongoing:

- Membership to the [UN Global Compact Network](#), the world's largest corporate sustainability initiative to help businesses support the UN Sustainable Development Goals.
- Support of [Rethink Orphanage Tourism](#), a cross-sector coalition working to reduce the incidence of human rights abuses in the orphanage industry by highlighting the intersection between orphanages, orphanage trafficking and modern slavery.

In 2022, through our media arm [Adventure.com](#), we also brought to light stories about how travellers can support slavery-related issues around:

Human rights

- [Travel boycotts aren't the answer. Here's why. | Adventure.com](#)
- [The Maasai are facing a battle for their home. Why? | Adventure.com](#)

Supporting at-risk communities

- [How to travel and make the world a better place in 2022 | Adventure.com](#)

Forced marriage

- [One woman's perspective on life in Iran today | Adventure.com](#)

Orphanage tourism and voluntourism

- [Grenada is launching a new voluntourism model. Is that a good thing? | Adventure.com](#)

Children as tourist attractions

- [After the pandemic, how can we decolonize our travels? | Adventure.com](#)

The total readership of Adventure.com is 1.5 million per annum.

SECTION SIX

Response to grievances

In 2022, Intrepid was alerted to a human rights issue by a trade partner in the UK. Intrepid operates trips for this partner in seven countries, including Tanzania. The issue related to the displacement of Masai people in the Ngorongoro area of Tanzania. The partner sought assurance that our trips did not visit this area or contribute to the forced eviction of Masai from their traditional land.

Actions



Conducted a desktop review of the issue, capturing various points of view.



Consulted with a senior leader in the East Africa office, who then visited the area to talk directly with locals and suppliers. There was no evidence of forced eviction of the indigenous Masai from the Ngorongoro area.



Furthermore, Intrepid consulted with a specialist in wildlife conservation, Indigenous community development and sustainable, premium tourism in the region.



The outcome:

Intrepid continues to monitor the situation through our East Africa office, our tour leaders, customer feedback and feedback from our trade partner.

SECTION SEVEN

Performance against 2021 commitments

Intrepid’s [Modern Slavery Statement in 2021](#) set the foundation for a stronger assessment of risk, greater protection for vulnerable and at-risk children, additional oversight by senior management and the Board, improved training, industry engagement and ongoing partnerships.

Improvements have been recorded in the following areas:

	Commitment	Action	Outstanding
Risk assessment	Build on the foundational risk assessment work to audit suppliers in our highest risk destinations, initially building on the insights within Thailand with a view to extending throughout Southeast Asia.	Formed consortium and signed agreement with the Informed 365 platform to measure modern slavery risk in our supply chain as referenced in “Risk of modern slavery in our supply chain” in section five above.	We are yet to incorporate into quarterly Board updates. This will be addressed in 2023.
Policy	Review Risk Register to include more detail on Intrepid’s modern slavery and human rights risks and include quarterly updates to the Board.	Improvements to the transparency of modern slavery risk in our supply chain, using the Informed 365 tool. The status of this work was included in the Transformational Programs Report that is presented at monthly trading updates with senior managers.	
Reporting	Extend Child Protection Guidelines into a Child Safeguarding Protection Policy.	Signed agreement with Friends International to implement the ChildSafe Movement guidelines, with Thailand a test market, as referenced in “Accreditation – ChildSafe” in section five above.	
Training	Refresh training with updated examples of how to better assess modern slavery risks, with the aim to achieve 100% completion of global modern slavery awareness training for all new and existing staff. The training will be available in English and Spanish.	Modern slavery training is part of the onboarding process at Intrepid. In 2022, 89.6% of new starters completed the Modern Slavery and Child Protection training modules, as referenced in “Training” in section five above.	We are yet to update the modern slavery awareness training. All staff will be required to undertake this training. Training notes and videos were not translated into Spanish. This will be addressed in 2023.
Awareness	Maintain active involvement in industry forums and working groups to promote the elimination of slavery around the world.	In 2022, Intrepid participated in the industry forums and working groups as referenced in “Industry advocacy” in section five above. We also co-founded the Travel Consortium on the Informed 365 platform as referenced in “Risk of modern slavery in our supply chain” in section five above.	
Partnerships	Continue to support our non-profit partners in our destinations that are addressing the causes of modern slavery and supporting the victims to rebuild their lives.	We have continued to support existing NFP partners, as referenced in “Partnerships” in section five above.	

SECTION EIGHT

Next steps in 2023

Signed on behalf of the Board of Directors



James Thornton
Chief Executive Officer,
Intrepid Travel

Signed: June 2023 for the financial year 2022
(1 January 2022 to 31 December 2022) for Intrepid Travel.

Increase supply chain visibility

- Release modern slavery survey through Informed 365 in Australia as a test market.
- Roll the survey out to the three countries of greatest risk of severe modern slavery issues: China, Egypt and Vietnam.
- The results of the survey will support us to identify specific modern slavery risks in our supply chain through the data collated from these three countries.

Reporting

- Review the risk register to identify modern slavery as a business risk.
- Include additional detail on specific modern slavery and human rights risks, as per the results from the survey.
- Establish metrics to measure improvements in performance year on year in the *Modern Slavery Statement*.
- Include progress report on modern slavery in quarterly updates to the Intrepid Board.

Policy

- Complete the implementation of the ChildSafe Movement guidelines in Thailand and commence implementation of the program in two additional Asian countries.
- Update Child Protection Policy.
- Review policies and codes of conduct to ensure that they comply with the revised Australian and Canadian Modern Slavery Act requirements. These include the Procurement Policy, contracts, and Supplier Code of Conduct.
- Update supplier contracts and codes of conduct to make specific mention of modern slavery.
- Update Human Rights Policy, Leader & Crew Conduct Policy, Responsible Purchasing Policy, and Grievance Procedures to make specific mention of modern slavery.

Training

- Refresh modern slavery training modules. Include references to location and audience where applicable.
- Aim to achieve 90% completion of global modern slavery awareness training for all new and existing staff.
- Translate two modern slavery training modules from English into Chinese, Arabic, Vietnamese and Spanish.
- Review the tour leader training in line with the changes to the Australian and Canadian Modern Slavery Acts.

Awareness

- Maintain active involvement in industry forums and working groups to promote the elimination of slavery around the world.
- Support staff learning and invite keynote speaker to present on modern slavery.

Partnerships

- Review non-profit partners that are addressing the causes of modern slavery to ensure donated funds are being invested in the most effective way possible.

Advocacy

- Publish two articles on modern slavery based on our experience of measuring and managing modern slavery risks in our supply chain.
- Present as part of a tourism panel on the risks of modern slavery in the tourism supply chain.
- Maintain membership of existing networks and expand to include membership to an industry specific modern slavery advocacy group or network.
- Attend one conference on modern slavery.

Grievance mechanisms and remediation

- Explore how we can improve our whistleblower process, including modern slavery grievances and instances, including a review of reporting channels, response protocols and remediation.
- Develop indicators on response to modern slavery issues to track improvements in performance year-on-year.

