

Intrepid Modern Slavery Statement 2021

Note: This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (UK) and constitutes our Modern Slavery Statement for 2021.

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, 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 2021. This Statement is Intrepid's fourth Modern Slavery Statement and corresponds to our previous statements and our Global Human Rights Policy.

1. Our business

For more than 30 years, Intrepid has been changing the way people see the world by offering sustainable experience-rich travel experiences that give back to the places and people we visit. In 2021, Intrepid offered more than 1,150 trips and experiences in 40 destinations. Every trip – whether closer to home or further afield – is designed for customers to truly experience local culture and engage with communities.

As we prepare to emerge from the pandemic, Intrepid Travel remains a responsible travel business, 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

As a vertically integrated business, we have operational offices called Destination Management Companies (Intrepid DMC), which operate most of our itineraries. The vertically integrated company model enables us to manage our 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. Intrepid Travel's [2021 Integrated Report](#) provides further details on our governance structure.

2. Our supply chain

Our supply chain includes 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 26 offices.

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 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 labor 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. The internal audit and risk committee will be consistently reviewing this statement and ensuring Intrepid 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, 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 Intrepid DMC network tracks 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 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 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.

Global Human Rights Policy

Our Global Human Rights Policy outlines our commitment to respecting internationally proclaimed human rights and ensuring we are 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.

Intrepid Code of Conduct

We are 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 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 trips on conduct that is deemed inappropriate and would result in termination of their contract. Such behaviour includes compromising the duty of care to passengers, failing to follow Intrepid'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 Travel'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 Travel to achieve this aim.

Prevention of Discrimination, Bullying and Harassment Policy

The Prevention of Discrimination, Bullying and Harassment Policy confirms that Intrepid 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 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 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 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 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 is committed to ensuring respectful and fair working conditions for all trekking porters. This policy includes specific local porter regulations at our Intrepid DMC 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.

5. Summary of actions taken during the fiscal year ending 31 December 2021

Intrepid 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 2022.

Corporate Goal

Obtaining B Corp recertification was Intrepid Travel's 2021 Corporate Purpose Goal. Included in this recertification was establishing baseline supply chain data on current human rights approaches, such as adoption of child protection guidelines by our suppliers. The information gathered formed a business case to create a supply chain management project in 2022, which includes managing modern slavery risks with suppliers. In addition, living wages were mapped where possible, and recommendations made to correct wages to ensure living wages were met for all of our employees.

Training

We continue to require human rights and global modern slavery awareness training for all new staff joining the business. The online training is compulsory.

Partnerships

We support the [Blue Dragon Foundation](#) in Vietnam, a high-risk modern slavery destination. In 2021, Intrepid Foundation's most successful fundraiser challenge event, the Blue Dragon Marathon Walk, raised \$189,739 (AUD) in 2021. This annual event raises funds for long-running partner the Blue Dragon Children's Foundation in Vietnam, which works to help children escape from crisis through protection from sex trafficking, forced labor and slavery, and provides shelter, education, and employment.

The Intrepid Foundation also supports [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. In 2021, the Foundation gave \$27,827 (AUD) to Forget Me Not in Nepal to support their work to provide families with pantry essentials and dry goods during this COVID-19 crisis as a preventative measure against re-entering the orphanage tourism cycle.

6. Our Next Steps for the fiscal year ending 31 December 2022

Risk Assessment

We will 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.

Policy

To extend our Child Protection guidelines into a Child Safeguarding Protection Policy.

Reporting

To review the Risk Register to include more detail on Intrepid's specific modern slavery and human rights risks and build MS updates into our quarterly Board updates.

Training

We will refresh our training with updated live examples of how we can better assess our MSA 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 both English and Spanish.

Awareness

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

Partnerships

We will 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.

Signed on behalf of the Board of Directors



James Thornton
Chief Executive Officer, Intrepid Travel

Signed: June 2022 for the financial year 2021 (1 January 2021 to 31 December 2021) for Intrepid Travel.