

## Intrepid Group Modern Slavery Statement 2020

*Note: This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (UK) and constitutes our Modern Slavery Statement for 2020.*

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 2020. This Statement is Intrepid Group's fourth Modern Slavery Statement and corresponds to our [previous statements](#) and our [Human Rights Policy](#).

### 1. Our business

Intrepid Travel Pty Limited is the operating entity of the Intrepid Group with its head office in Melbourne, Australia and our ultimate parent company is Intrepid Group Limited.

Independently owned by the founders of Intrepid Travel, Intrepid Group is a collection of three tour operator brands and 23 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. Prior to the onset of the global Covid-19 pandemic we carried 460,000 passengers a year on over 2,700 itineraries in 120-plus countries across every continent, catering for all ages, budgets and appetites for adventure. Unfortunately the impacts of the pandemic meant that in March 2020 we suspended our global trip operations for the first time in our 31 year history.

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

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- Giving back to local communities

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 [2020 Integrated Report](#) 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 26 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 Travel 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, 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 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;

# Intrepid Group

- 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 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 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:

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- 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 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 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 2020**

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 2021

### **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.

### **Policy updates**

Our Human Rights policy was reviewed by an external consultant resulting in updates to strengthen the governance over the policy.

### **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:

- Continued to be on the steering group for Rethink Orphanages;

- Presented on the topic of Modern Slavery for Human Rights in Tourism webinar "A Human Rights Narrative"
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## **Risk Assessment**

We had Ndevr Environmental consulting undertake an assessment of our policy and process to addressing Modern Slavery to create a benchmark and roadmap for future development. On their four point scale of Emerging, Evolving, Embedding and Excelling, we rated at the second level of Evolving in our readiness assessment. To further create a future roadmap to assist in moving to the next stage of embedding our practice a specific assessment was undertaken to review the risks on an individual high volume trip in Thailand. This assessment provided a format for future assessments that will be more broadly rolled out through our business.

## **6. Our Next Steps for the fiscal year ending 31 December 2021**

### **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 South East Asia.

### **Policy**

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

### **Reporting**

Review Risk register to include more detail on Intrepid's specific modern slavery and human rights risks and build MS updates into quarterly Board updates.

### **Training**

We will refresh our training with update 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.

Signed on behalf of the Board of Directors



James Thornton  
Chief Executive Officer, Intrepid Group

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Signed: May 2021 for the financial year 2020 (1 January 2020 to 31 December 2020)  
for Intrepid Group.