



# MODERN SLAVERY STATEMENT

Reporting period: January – December 2024



*This statement has been lodged with the Australian Attorney-General's Department (AGD) for assessment.  
It has not yet been approved by the AGD or published on the Online Register for Modern Slavery Statements.*





# Contents

<b>About this statement</b> .....	3	Assessing risk in our operations and supply chain – by industry .....	8	<b>Issues of modern slavery in our supply chain in 2024</b> .....	19
Acknowledgment of Country.....	3	Intrepid’s top 10 destinations in 2024 .....	10	<b>Key lessons from our work in 2024</b> .....	20
<b>Modern slavery in context</b> .....	4	<b>How important is modern slavery to our stakeholders?</b> .....	11	Business developments that increase the risk of modern slavery in our supply chain.....	20
The political and legislative context .....	4	<b>Intrepid’s commitment to reducing modern slavery risk</b> .....	12	<b>Our next steps in 2025</b> .....	21
<b>Intrepid’s structure, operations and supply chain</b> .....	6	<b>Management, reduction and oversight of risk</b> .....	13	<b>Appendix</b> .....	22
Our business.....	6	How we manage risk of modern slavery	13	Progress against the 2024 commitments .....	22
Our board .....	7	How we mitigate risk .....	16		
Risk-governance structure.....	7				
Supply chain.....	8				



# 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 2024 to 31 December 2024 (the reporting period or Financial Year 2024) and constitutes our Modern Slavery Statement for 2024.

This statement details Intrepid's approach to understanding and managing modern slavery risks in our global operations and our supply chain during 2024.

This statement is Intrepid's seventh Modern Slavery Statement and corresponds to our previous [statements](#). It is part of our broader human rights commitment, as set out in our [Global Human Rights Policy](#). This statement outlines the practical steps we have taken and highlights the commitment to future actions in our ongoing work to identify and minimise risk of modern slavery.

This statement was approved by the Intrepid Board on behalf of all our reporting entities, acting as a higher entity under section 14(2)(d) (ii) of the Modern Slavery Act, on 17th June 2025.

This statement will be uploaded to the [UK Modern Slavery Register](#) and to the [Australian Modern Slavery Register](#) as required under the Acts for both countries, as well as to the Intrepid website. A link to this statement will be displayed on the home page of our website as per the requirements of the Modern Slavery Act 2015 (UK).

## Acknowledgment of Country

Intrepid Travel acknowledges the Traditional Custodians of the Lands on which we live, work, and travel. Our head office is located in Narrm/Melbourne, on the unceded lands of the Wurundjeri People of the Kulin Nation.

We recognise and pay our respects to Elders past and present, and extend that respect to all First Nations peoples across the many Countries where our team members live and work. We honour their enduring connection to Country, waters, skies, and culture.

We are deeply grateful for the generosity of First Nations communities in sharing their knowledge, stories, and histories. Their guidance helps us learn, grow, and walk together toward a more just and equitable future.

Kakadu National Park,  
Northern Territory,  
Australia.



# Modern slavery in context

Modern slavery is a heinous crime and a morally reprehensible act that deprives one person's liberty and dignity for another person's gain.

There is no definitive internationally agreed definition of modern slavery. Modern slavery is a broad umbrella term that includes forms of forced labour such as servitude, indentured labour, debt bondage, deceptive recruitment, human trafficking, forced marriage and extreme forms of child labour. The things that these acts all have in common is one person's control over another with the intention of exploitation for personal gain and the deprivation of liberty and free choice of the controlled person.

The [2023 Global Slavery Index](#) research found that there are approximately fifty million people living in slavery conditions around the world, an increase of 10 million from the 2018 study. Fifty six percent of those victims are in some form of forced labour. Ending modern slavery, forced labour, and human trafficking by 2030 is part of the UN's Sustainable Development Goal 8 to promote inclusive and sustainable economic growth, full and productive employment and decent work for all.

## The political and legislative context

Every company is at risk of being involved in this crime through their operations and their supply chain. Intrepid is obligated to report under the UK Modern Slavery Act (2015) and the Australian Modern Slavery Act (2018).

The UK Modern Slavery Act requires businesses with a presence in the UK to publish a Modern Slavery Statement detailing the steps their organisation is taking to tackle modern slavery. To comply, this statement must report on the work that an organisation is doing with their tier one and tier two suppliers to expose any instances of modern slavery, rectify these issues and improve suppliers' response to modern slavery issues. The UK Government conducted a review of the UK Modern Slavery Act in 2024, finding insufficient reporting requirements in the Act and found that recent immigration

laws restricted victim support. The position of Independent Anti-Slavery Commissioner was vacant for 18 months up to the end of 2023, indicating that modern slavery is not a priority for the Government. The Government responded to the findings in December 2024, committing to reviewing immigration and modern slavery policies, and will move towards mandatory due diligence by businesses of their operations and supply chain.

The Australian Modern Slavery Act requires any entities operating in Australia with a turnover of more than AUD\$100 million to lodge a Modern Slavery Statement with the Attorney General each year.

An independent statutory review of the Australian Modern Slavery Act was conducted in 2022 and 2023, with the report and thirty recommendations made available in 2023. In June 2024, the Australian Government implemented one of the recommendations from the review, creating the role of Commonwealth Anti-Slavery Commissioner. This role will focus on increasing compliance with the Modern Slavery Act and supporting Australian businesses to comply. Chris Evans commenced

in the role on 2 December 2024. The Government did not make any other changes to the Modern Slavery Act in 2024, but has committed to consult further on introducing penalties, strengthening due diligence, introducing mandatory reporting criteria and making declarations to the Government of high-risk jurisdictions, products and/or suppliers. It will not implement a lowering of the reporting threshold below AUD\$100 million.

In November 2024, Intrepid was invited by the United Nations Global Compact to input into a study conducted by the United Nations Special Rapporteur on contemporary forms of slavery, Tomoya Obokata. Mr Obokata consulted with Australian businesses to understand the nature and extent of contemporary forms of slavery in Australia and analyse the efforts of Australian businesses to address these issues. He released a [statement](#) that same month with recommendations for both Government and businesses.

In Canada, the Supply Chains Act came into force on 1 January 2024. This legislation requires certain Government institutions and entities to report on their efforts to prevent and reduce the risk of forced or child labour in their supply chains. Intrepid does not meet the thresholds for reporting, which are a minimum of CAD\$20 million in assets, \$40 million in revenue, and at least 250 employees.

The European Commission's Forced Labour Regulation came into being on 25 July 2024. This new law prohibits people or businesses from importing and selling within the EU, or exporting outside of the EU, products made with forced labour (as defined by the International Labour Organisation). Under the Corporate Sustainability Due Diligence Directive, large EU based companies with more than 1000

employees and a turnover of EUR 450 m worldwide, and non-EU based companies with a turnover of EUR 450 m in the EU, are required to identify and address adverse impacts on human rights and the environment related to their business operations including their supply chain. Again, Intrepid does not meet this threshold.

Globally, some of the key indicators of worsening human rights issues – conflict, climate change and forced migration – are on the increase. While we do not have updated statistics on modern slavery, instances of related human rights issues such as human trafficking, [are increasing](#). But modern slavery and human rights abuses are not just an overseas concern. Reports to the Australian Federal Police of forced labour in Australia increased by [60% YOY to June 2024](#), and there were 382 reports of modern slavery related offences in the same period. The Federal Government have committed to legislative reform to further strengthen the criminal code and the ability of police to tackle these crimes.

## The link between climate change and modern slavery

A report by Anti-Slavery International and the International Institute for Environment and Development shows that there is growing evidence of the role that climate change plays in increasing people's risk of becoming modern day slaves. Climate change increases food insecurity and threatens livelihoods, thereby deepening poverty of already vulnerable households. There are three key indicators of the link between climate change and modern slavery:

1. Forced migration: Climate change causes extreme weather events like floods, droughts, and hurricanes, which can destroy homes and livelihoods. This forces people to migrate in search of safety and work. During these migrations, people are more vulnerable to exploitation, including human trafficking and forced labour. The World Bank's 2021 Groundswell Report found that climate change is a significant driver of migration and 216 million people could be forced into migration because of climate change by 2050.
2. Economic vulnerability: Climate change can lead to loss of income, especially in agriculture-dependent communities. When people lose their jobs and resources, they become more likely to fall into exploitative situations, including modern slavery.
3. Exploitation in harmful industries: Extractive industries, and agricultural businesses in particular, contribute to the emissions that drive climate change and damage land and water that people rely upon for their livelihood. This can lead to poverty and forced migration, which in turn can increase the risk of falling into slavery situations.

Source: [Anti-Slavery International](#), [Unseen UK](#), [ScienceDirect](#) and [The World Bank](#)

# Intrepid’s structure, operations and supply chain

For more than 35 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. We have 31 offices around the world and operate more than 900 small group adventures in 118 countries across all seven continents. In 2024, this saw us take a total of 287,113 customers on trips. Every trip is designed for customers to truly experience local culture and engage with communities.

Intrepid recertified as a B Corporation in 2024, a global certification for companies that strive for the highest verified environmental, social and governance standards. We are committed to:

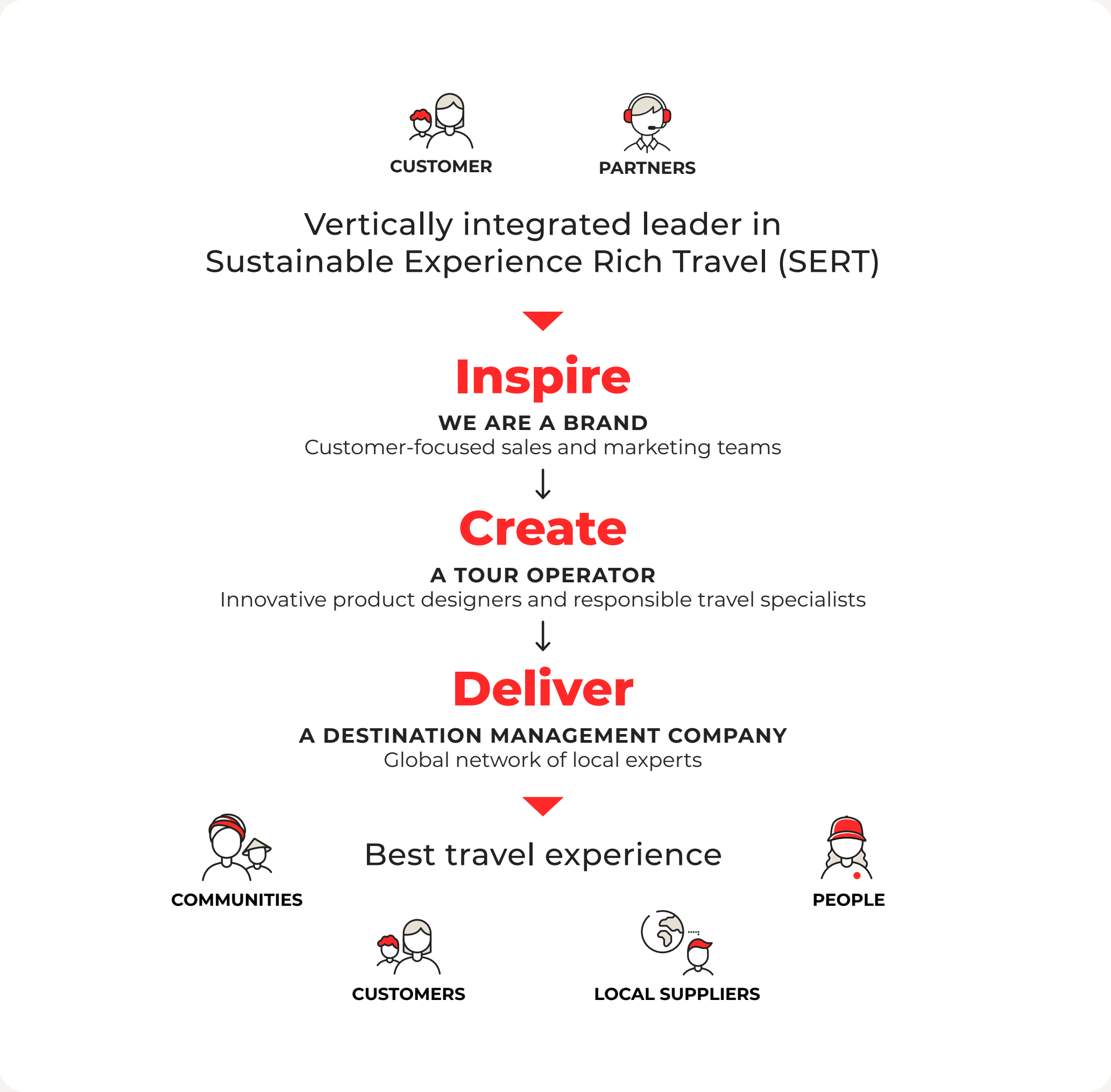
- Creating a fair and inclusive working environment for our employees, ensuring positive worker wellbeing, including compensation, benefits, work-life balance, and safe and fair working conditions.
- Positively impacting on the local community, including charitable giving, civic engagement, and effects on the surrounding environment and social fabric.
- Minimising our environmental footprint, including use of resources, waste

management, and the environmental impacts of our operations and supply chain.

- Building a strong relationship with our customers, including their satisfaction, loyalty, and the overall value.
- Ethical practices, transparency, and accountability in the way Intrepid is managed.

As a vertically integrated tour operator, Intrepid owns Destination Management Companies (Intrepid DMCs), which operate most of our itineraries. This vertically integrated company model enables Intrepid to manage our 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.

## Our business





Our board

We are governed by a board of six directors with responsibility for approving the strategic direction of the business, supporting the management team to achieve our strategic plans, monitoring risk, culture, reputation and standards of conduct, and overseeing responsible governance practices.

The Audit and Risk Committee oversees financial management (including the external audit process), compliance and risk management, internal control systems, insurance and legal proceedings and health and safety. Modern slavery falls under the remit of the Audit and Risk Committee.

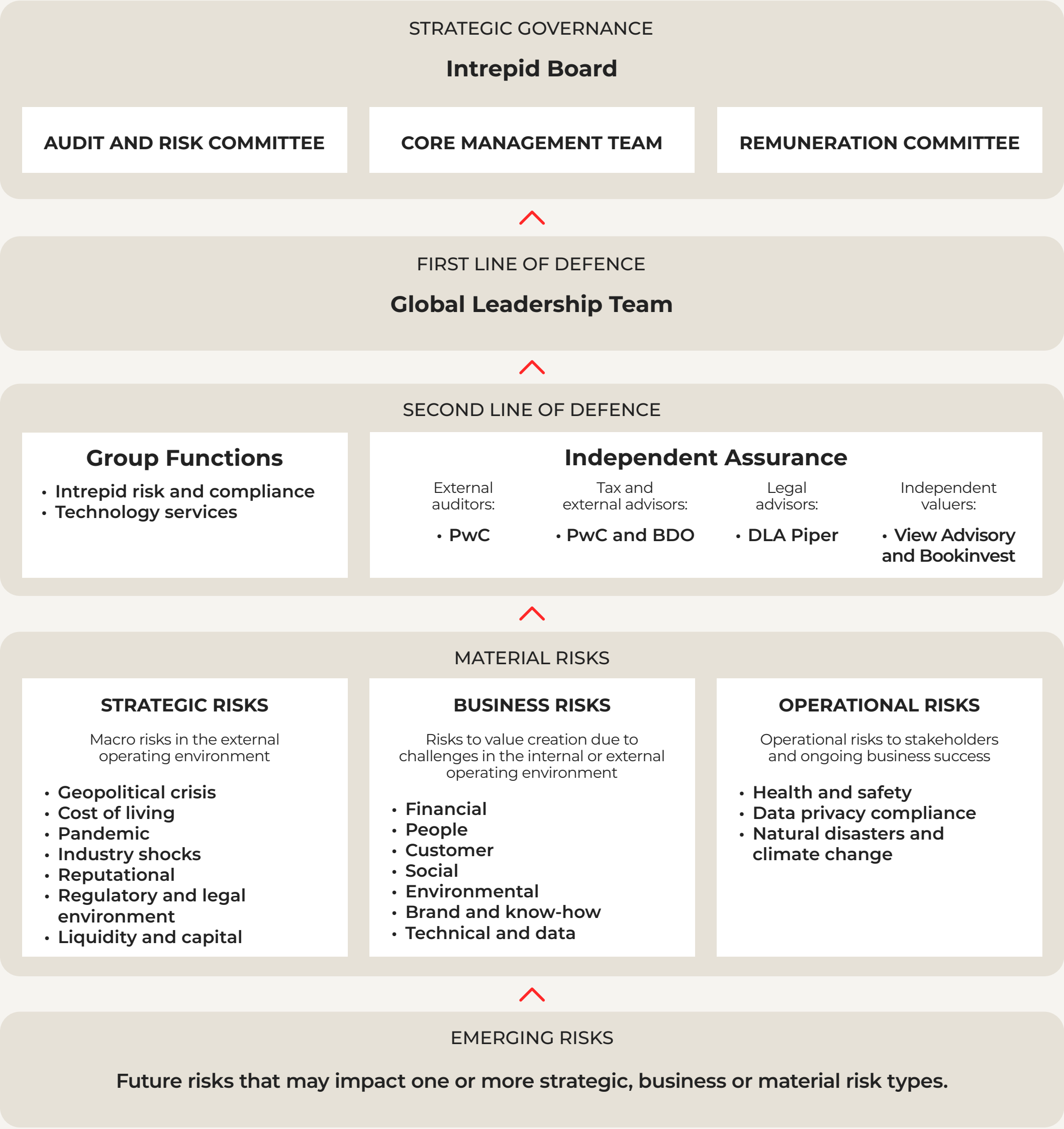
Intrepid Travel’s [2024 Integrated Report](#) provides further details on our business and governance structure.



Intrepid’s structure, operations and supply chain

Risks are inherent in all of our business activities and can relate to strategic threats, operational issues, compliance with laws and reporting obligations. Intrepid actively integrates risk management processes in all business functions and procedures through an organisation-wide enterprise risk-management framework. Risk-management performance is monitored, reviewed and reported to executive management and the Board to provide assurance of compliance in line with ISO 31000. The Company Secretary is responsible for this framework, as well as maintaining the company's risk register.

Risk-governance structure



## Supply chain

Intrepid’s global supply chain encompasses suppliers that help us to operate our business and our trips. This results in a diverse range of suppliers and industries. In 2024, Intrepid’s direct suppliers totaled 10,582, including the suppliers that we engage for external branded trips as well as Intrepid trips. \*NB: Suppliers for trips that are operated by Intrepid on behalf of other companies were not counted in Intrepid’s 2023 Modern Slavery Statement.

We are a tour operator, meaning that we contract accommodation suppliers, transport suppliers, experience suppliers and restaurants and package these components into different itineraries to sell to our customers. Accommodation is the largest category measured by spend, followed by flights, transport, activities and meals. We do not own these services; these are our tier one suppliers. While we are a large and diverse global business, we are a relatively small client for many of our suppliers. This means our ability to influence supplier operations varies in its degree. However, we are committed to respecting human rights throughout our supply chain and supporting our suppliers and business partners to adopt and follow robust principles and independent standards.

## Assessing risk in our operations and supply chain – by industry

Modern slavery can occur in every industry and every sector. Travel and tourism is a high-risk sector in part because elements of the industry rely on low-skilled roles filled by unskilled or migrant workers, such as kitchen staff and hotel housekeepers, or the unlawful use of child labour in the handicrafts and textiles industry. When assessing industry risk, the travel and tourism sector is not measured as a whole industry, rather the assessment has been made on a range of tourism-related subindustries (see Table 1.0). This data is contained in consultancy Edge Impact’s report ‘Modern slavery using the Global Industry Classification Standard taxonomy’ (not publicly available).

Table 1.0 – Risk in Intrepid’s supply chain

TRAVEL RELATED SUB-INDUSTRY	ENTRY POSITION IN INTREPID'S SUPPLY CHAIN (TIER 1/2/3)	MODERN SLAVERY RISK RATING
Casinos & Gaming	n/a	High
Leisure Facilities	○ T2	Very high
Restaurants	● T1	Very high
Hotels, Resorts & Cruise Lines	● T1	High
Airline	● T1	High
Marine	● T1	High
Rail	● T1	Medium
Airport Services	○ T2	Medium
Marine Ports	○ T2	High

Other adjacent industries that are considered high risk for modern slavery, according to the [United Nations Global Compact](#), are cleaning, hospitality and textiles production.

As a tour operator, Intrepid’s direct risk of modern slavery within our business is comparatively low compared to these adjacent industries. But the risk profile for our tier one suppliers is high.

● Highest / most severe risk.    ○ Serious risk.



Assessing risk in our operations’ supply chain – by country

In 2024, Intrepid operated 948 trips in 118 countries.





Some of these destinations are in the highest-risk countries for human rights violations and modern slavery, according to the [Global Slavery Index 2023](#) by Walk Free and the [Destination Risk Map](#) created by the Roundtable Human Rights in Tourism.

Using the data from the Global Slavery Index, we operate trips and have an office and/or a DMC in three of the top ten countries that are at the highest risk of modern slavery violations:

Table 2.0 – Countries at the highest risk of modern slavery violations

COUNTRY	OFFICE/DMC	TRIP (2024)
North Korea	n/a	n/a
Eritrea	n/a	n/a
Mauritania	n/a	n/a
Saudi Arabia	n/a	●
Türkiye	●	●
Tajikistan	n/a	●
UAE	n/a	n/a
Russia	n/a	n/a
Afghanistan	n/a	n/a
Kuwait	n/a	n/a

According to data from the Roundtable Human Rights in Tourism, we operate trips and/or have an office in 18 of the 22 countries that are at the most severe risk of human rights violations:

Table 3.0 – Countries at severe risk of human rights violations

COUNTRY	OFFICE/DMC	TRIP (2024)
Venezuela	n/a	n/a
China	●	●
Egypt	●	●
Vietnam	●	●
Cuba	n/a	●
Türkiye	○	○
Indonesia	○	○
India	○	○
Thailand	○	○
Morocco	○	○
Sri Lanka	○	○
Colombia	○	○
Peru	○	○
Mexico	○	○
South Africa	○	○
Tanzania	n/a	○
Bulgaria	n/a	○
Brazil	n/a	○
UAE	n/a	n/a
Tunisia	n/a	n/a
Maldives	n/a	○
Dominican Republic	n/a	n/a

Intrepid’s top 10 destinations in 2024

1.  
Vietnam

Severe risk of human rights violation.

2.  
Morocco

Serious risk of human rights violation.

3.  
India

Serious risk of human rights violation.

4.  
Cambodia

Increasing concern over human trafficking and scam activity not yet measured.

5.  
Peru

Serious risk of human rights violation.

6.  
Japan

7.  
Türkiye

Serious risk of human rights violation, high risk of modern slavery.

8.  
Sri Lanka

Serious risk of human rights violation.

9.  
Australia

10.  
Italy

Our highest risk and greatest opportunity to understand modern slavery risk is through tier one suppliers in high and very high-risk subindustries in very high-risk countries where we visit the most. This analysis of country risk forms the basis for the prioritisation of due diligence. Overlaid on this list is seasonality of travel (preferring low season) and the timing of pricing and contracting. Our priority is to complete due diligence of those markets with severe or serious risk of human rights violation and/or high risk of modern slavery in which we carry the highest number of trips and volume of customers, before moving to the higher risk but smaller markets.

Once we assess practices that contribute to modern slavery risks, we can attempt to influence a change through education and upskilling. We are limited in our leverage, but if we deem the risk too high or the supplier does not address the risk within a certain timeframe, we can remove the supplier from our itineraries. If we find evidence of modern slavery, we will ask the local General Manager for assistance to remedy through a local authority or a local NGO, depending on the type of activity identified.

● Highest / most severe risk. ○ Serious risk.



# How important is modern slavery to our stakeholders?

In 2023, we surveyed our customers, suppliers, people and partners to understand the sustainability issues that mattered most to them. We asked them to rate the importance and impact of a range of governance, social and environmental sustainability topics.

We are using these findings to help shape the goals for the responsible operation of our business, prioritise our actions, communicate our purpose, and impact performance to our stakeholders. The results helped us identify emerging trends and risks that may affect long term value creation.

The survey showed that social issues are of great concern to each group. Human and labour rights, which includes modern slavery, were in the top 3 concerns for customers and partners and influenced our decision to create the role of Global Responsible Supply Chain Manager.





## Intrepid's commitment to reducing modern slavery risk

Intrepid takes human rights seriously and is fully committed to playing our part in ending modern slavery and preventing slavery and human trafficking in our operations 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.

During 2024, we continued to engage and consult with all companies we own or control, educating new staff on the causes of modern slavery and the steps Intrepid is taking to combat them. We continue to explain the reporting requirements of the Australian and the UK's Modern Slavery Acts, and our obligation to measure, mitigate and report on modern slavery, and their role in collecting this data and remaining vigilant to signs of risk.

### 8 DECENT WORK AND ECONOMIC GROWTH



SDG 8:

### Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

For SDG 8, there are 10 targets and two of them, target 8.7 and 8.8 address the eradication of modern slavery and human trafficking and the protection of workers' rights to a safe workplace:

8.7 – Take 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, and by 2025 end child labour in all its forms.

8.8 – Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.



# Management, reduction and oversight of risk

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.

## How we manage risk of modern slavery

### Global supplier benchmarking

The Intrepid DMC network and contracting team tracks the structure, quality, service and performance of existing suppliers. This procedure allows Intrepid to evaluate suppliers regularly and identify and mitigate any issues related to compliance with our Supplier Code of Conduct. Our procurement team includes a dedicated Responsible Supply Chain Manager. See the policy section below for more details on the Code.

### Recruitment and employment

Intrepid complies with the policies set out in the company's Employee Handbook. Additionally, we employ the following actions:

- Directly recruit, select and hire all staff and tour leaders.
- Meet all legal obligations in the recruitment and onboarding 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.

- Staff and tour leaders are provided 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.
- Workers are paid their legal pay entitlements, on time and provided with payslips 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.
- Original identity related documents of workers, such as passports, national identity cards or birth certificates, are not retained by Intrepid.
- Workers are not required to lodge any security deposits such as financial or personal property, nor pay any recruitment fees to be employed by Intrepid.
- 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.

### Customer feedback

Every customer is emailed an online feedback form after the end of their trip. They are asked whether their trip was operated responsibly and provides the ability for customers 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 collated in a register that is managed by Intrepid's global purpose team and investigated by the Intrepid DMC office where the complaint occurred.



**Leader trip report**

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.

**Our policies**

The following internal 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.

This policy was reviewed and updated in 2023, with a commitment to undertake human rights due diligence every three years.

**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.

**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 duty of care to customers, failing to follow Intrepid’s core values, or breaching local laws and other acts of misconduct.

**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.

The Supplier Code of Conduct was updated in 2023 to specifically outline Intrepid’s expectations of the behaviours and practices that will mitigate the risk of modern slavery.

**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 Amendment [Bribery of Foreign Officials] 1999) hold Intrepid Travel’s companies, staff and suppliers accountable for preventing bribery and corruption anywhere in the world where 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 Group to achieve this aim. This policy was recently updated in September 2023.

**Prevention of Discrimination, Bullying and Harassment Policy**

Intrepid’s Prevention of Discrimination, Bullying and Harassment Policy confirms 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 to 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 tour leaders and crew, external consultants, contractors and agency personnel while providing services to Intrepid companies. It was recently updated in August 2024.

### 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 Responsible Purchasing Policy aims to ensure that we create positive impacts while still serving the operational needs of the business. It was recently updated in June 2023.

### 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. 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. It was recently updated in June 2023.

### 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 at 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.

### Staff education

Intrepid mandates human rights and global modern slavery awareness training for all new staff joining the business through our Enboarder system. 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. 453 staff completed the modern slavery and child protection training modules in 2024.

Our training consists of the following modules:

- 1. An explanation of modern slavery;**
- 2. A link to our Modern Slavery Statement;**
- 3. Our stance on child protection;**
  - Intrepid's Child Protection Guidelines;
- 4. An explainer on the ChildSafe program;**
  - Why we don't visit orphanages;
  - Why we don't encourage travellers to give money to beggars.

## Special guest speaker

In February 2024, Intrepid staff were invited to a discussion with Professor Justine Nolan, Director of the Australian Human Rights Institute at UNSW. Professor Nolan is an internationally recognised expert in modern slavery and human rights issues relating to business practices. She presented on modern slavery risk and due diligence in international supply chains. This virtual meeting was attended by purpose, procurement and operations staff, the General Manager of Purpose and the Chief Operating Officer who is a member of the global management team.



## How we mitigate risk

### Empowering communities

Our style of Sustainable Experience Rich Travel (SERT) enables us to help more people benefit culturally and economically from global travel, by anchoring community experiences within our itineraries. We promote the fulfilment of human rights and reduce the risk of modern slavery by contributing to local, social, environmental and economic development.

### Living wage

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 ability to save. Earning a living wage lessens the likelihood of individuals becoming victims of forced or bonded labour or child labour. Paying a living wage for all employees is a commitment that Intrepid signed up to through the United Nations Forward Faster Initiative in 2023. That year, Intrepid conducted the remuneration review using global family 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. We identified ten staff members in four countries who were paid less than the living wage and who were remediated.

In October 2024, we completed a living wage assessment of the wages paid to our contracted tour leaders around the world. The full review of the remuneration and benefits of tour leaders will be completed and implemented in early 2025. The revised pay structure is due for implementation in 2025.

In February 2024, our General Manager of Purpose published an article in Medium, titled '[Living Wage: Why We Need Action Now](#),' calling for living wage to become a minimum standard for global B Corporation measurement, after it was rejected in the drafting of the new standards.

### Supportive partnerships

Through the Intrepid Foundation, we continue to have a strong relationship with the Blue Dragon Children's Foundation in Vietnam, which works to protect and rescue women and children from sex trafficking, forced labour and slavery, and provides shelter, education and employment. In September 2024, 17 Intrepid teams around the world helped to raise money by participating in the Blue Dragon Marathon Walk. Including the funds contributed by customers, the Foundation raised \$411,080 for Blue Dragon in 2024 and connected them to 19 other corporate partners

that contributed over and above. The funds raised for Blue Dragon contributed to the rescue of 150 people from human trafficking, the provision of emergency shelter, clothing and meals for 150 survivors of human trafficking, 1,200 children to be enrolled in school for a year and 150 young adults to enrol into vocational training. 370 families were funded to start a farm or business, and they ran 150 training sessions on skills development, career orientation and trafficking prevention.

The Intrepid Foundation also supports other not-for-profit organisations that work to protect people from exploitation through direct donations, including:

- [Open Arms](#), an organisation in Spain that protects people trying to reach Europe by sea. They may be fleeing from armed conflict, persecution or poverty. Open Arms provides education and support to the communities on the mainland so that those who migrate can freely make informed decisions. The Intrepid Foundation raised \$62,415 for them in 2024 which contributed to the rescue of 57 people, mostly from West Africa and South Asia.
- [Patinaai Osim](#), a not-for-profit organisation in Kenya who support the education of children and empower marginalised women to create sustainable livelihoods, saving them from being forced to marry against their will. The Intrepid Foundation raised \$77,405

for Patinaai Osim in 2024, contributing to a tailoring program in the Noosidan Community, where 14 Maasai women were trained in design, sewing and production techniques.

- [Kilimanjaro Porters Assistance Program](#) is part of the Kilimanjaro Responsible Trekking Organisation, who advocate for the fair treatment of the Kilimanjaro Mountain crew (porters) in Tanzania. They ensure all the minimum standard requirements for porters, climbers and even trekking companies are met. In 2024, the Intrepid Foundation raised \$20,191 for them to maintain their monitoring and compliance programme and run their financial literacy programs to empower porters to manage their finances more effectively.

### Improving our due diligence

In our 2023 Modern Slavery Statement, progress on supplier due diligence was slower than expected due to the challenge of working across many different cultures and languages. This required more flexibility of our third-party technology platform than it could deliver. We committed to more efficient and effective processes in 2024. For the first six months, we explored technology solutions for the platform to meet language and cultural needs, and to personalise communication with suppliers, but were not able to find a suitable solution.



At the same time, we explored introducing responsive screening questions into our supplier code of conduct or into the supplier contract, that would allow us to identify suppliers at high risk of modern slavery. While we are able to include screening questions that will identify risk in the document, our contracting system cannot record responses. Long term, our system is being overhauled and we are working with the procurement team to assess future capability to capture supplier risk.

In July 2024, we took the supplier due diligence process back in house. We repurposed the assets already developed, such as the survey, the network of modern slavery experts and the modern slavery information resources, and developed our own distribution approach, using the contracting managers in the DMCs and basic software tools (Microsoft Forms and Excel). We also invested in a high-quality translation software.

Since then, we have

- 1. Streamlined the due diligence process (see engagement process above)
  - Updated the Supplier Code of Conduct to more explicitly outline the expectations of suppliers as employers.

- 2. Trained contracting managers in four high risk markets to understand and participate in the supplier due diligence process: Cambodia, Colombia, Vietnam and Morocco.
  - Surveyed suppliers in these four markets and assessed the risk of modern slavery within these suppliers' business practices and in their tier one supply chain, with a 99% response rate.
  - Identified 27 suppliers with potentially risky practices.
  - Created and sent Supplier Support Plans (in language) to the contracting managers in these markets to share with those suppliers.

Supplier training

Intrepid regularly runs supplier training workshops around the world. In 2024, with the support of the Responsible Supply Chain Manager, the modern slavery content in the training materials was strengthened. In total we ran five supplier workshops, training 246 suppliers.

Southern Africa  
**34**  
suppliers  
trained

East Africa  
**50**  
suppliers  
trained

Cambodia  
**50**  
suppliers  
trained

Nepal  
**72**  
suppliers  
trained

Egypt  
**40**  
suppliers  
trained

Engagement process – supplier due diligence for measuring and addressing modern slavery risk

- Education session with key staff is delivered in an individual DMC on the behaviours and processes that indicate high risk of modern slavery in our supply chain.
- Local staff review the standard modern slavery survey to highlight any cultural barriers and translate into language if required.
- Relationship holder emails survey to our most material suppliers in that country.
- Global Purpose Team gathers data and reviews red flags with DMC staff.
- Supplier support plans (in language) are provided to at-risk suppliers, including local legislative requirements.
- Contracting manager provides support for implementation of changes as required.

Increasing our reporting capacity

Intrepid welcomes changes to strengthen regulatory requirements for sustainability reporting and disclosures which foster greater levels of corporate transparency and accountability.

In 2022 and 2023, Intrepid invested in resourcing our procurement and purpose teams through additional staff, training and upskilling. Intrepid became a member of United Nations Global Compact (ANZ) Modern Slavery Community of Practice. To improve oversight in each market, we created a Purpose Champions Network, with champions in every office, to assist in upholding



and reporting on our environmental and social impact commitments, including our modern slavery commitments. There are more than 100 purpose champions across our 31 offices.

We welcome and employ third-party input and oversight through specialist groups and advisors to support our work on reducing the threat of modern slavery in our business and more broadly.

- Intrepid is a member of the United Nations Global Compact (ANZ) Modern Slavery Community of Practice. We attended three meetings in 2024.
- In November 2024, Intrepid was invited to participate in a business consultation with the UN Special Rapporteur on Contemporary Forms of Slavery, organised by the UN Global Compact. The resulting report, released the same month, examined the practices and challenges faced by the business sector in implementing the Modern Slavery Act in Australia.
- In July 2024, Intrepid was invited to join the Sustainability Professionals Association and invited to a roundtable discussion on Addressing & Reporting on Human Rights in a Changing Regulatory Environment.
- Intrepid is trialling 'ChildSafe', an accreditation programme by Friends International, as part of their ChildSafe Movement

Program. Our offices in Thailand and Cambodia are participating in the trial.

- In Cambodia: 30 leaders (94%) and 18 (86%) office staff were ChildSafe trained.
- In Thailand: a total of 50 people were trained across 3 sessions, including staff and leaders.

### Industry and other advocacy

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

In 2024, this included:

- Membership to the UN Global Compact Network, the world's largest corporate sustainability initiative to help businesses support the UN Sustainable Development Goals.
- A presentation by the GM of Purpose at the Tier 2 and Beyond Modern Slavery webinar in July 2024, organised by Informed365 and Better Sydney.
- A presentation by the Global Social Impact Manager at the EcoTourism Global Sustainable Tourism summit in June 2024, on the topic of the social impact of tourism, including a significant section on modern slavery.

In 2024, through our owned media brand Adventure.com, we published three articles which addressed modern slavery related topics of female oppression in Saudi Arabia and Kenya and slavery in America:

- Is positive-impact travel to Saudi Arabia even possible?
- Navigating history, culture and power through travel: Reflections on Intrepid's Gullah Geechee heritage trip.
- Meet Semerian Sankori, the woman changing the lives of rural communities in Kenya.
- The total readership of Adventure.com is 1.5 million per annum.

## Modern Slavery Consortium – changes in 2024

For the first six months of 2024, Intrepid and Flight Centre were members of a Modern Slavery in Tourism consortium that was convened by the specialist software supplier, Informed365, to whom we were a subscriber. With the decision to end our subscription, we were no longer a part of that consortium. Intrepid has transitioned from being members of Informed365's Modern Slavery in Tourism consortium to proposing a consortium to address modern slavery in the travel industry in partnership with Flight Centre. This proposal was taken to the Australian Travel Industry Association (ATIA) to be the coordinator for the consortium which was accepted and ratified by their Board in September. We expect that the consortium will be active in mid-2025, once the business model and terms of reference are approved. Intrepid and Flight Centre are the inaugural members of the consortium.



# Instances of modern slavery in our supply chain in 2024

## Modern slavery alert in Nepal (Nepalese guesthouse)

In June 2024, we were alerted by Intrepid's product team to a negative article written by a visitor to Nepal related to a female-run guesthouse, called 3 Sisters Guesthouse. The article was written in 2012, well before the guesthouse was an Intrepid supplier, and made a complaint about young girls working as trekking guides, being underpaid and living in cramped conditions at the guesthouse.

While the complaint was more than 10 years old, and we were unable to find any more supporting evidence, given the public nature of the complaint we decided to investigate further.

We met with the General Manager and Contracting Manager in the Nepal DMC to discuss. They advised that Intrepid has been using the guesthouse since 2023, but we were not using

the trekking product. They had not observed any issues in its day-to-day operations. They also pointed out that some of the accusations in the article, particularly related to the sleeping arrangements and kitchen, were criticisms from a Western perspective.

Our investigation consisted of:

- Contacting a local NGO that works in Nepal in the area of child trafficking and orphanage tourism.
- Checking customer reviews: We found no commentary at all, either negative or positive, on the 3 Sisters Guesthouse.
- Checking public reviews: There was one adverse comment left 14 years ago on TripAdvisor.
- Seeking additional research: We unearthed an academic article about female trek leaders in Nepal. The author interviewed 10 female guides trained by 3 Sisters. No adverse findings were presented in the article.

- The DMC sent two (female) staff to visit the guesthouse and report back with no adverse findings.
- A follow up meeting was held between Intrepid's global purpose team and the Nepal DMC where we agreed that with no further evidence, the investigation was closed, and it was agreed that the purpose team would monitor customer reviews of the 3 Sisters Guesthouse over the next 12 months.
- There has been no negative customer feedback left about the property since July 2024.





# Key lessons from our work in 2024

1.

## Trust is essential in due diligence

For Intrepid's supply chain, which consists of small businesses in geographically and culturally diverse markets, successful data collection and subsequent risk reduction are most effective when managed by our Contracting Managers who have professional and trusted relationships with the suppliers.

2.

## Importance of language

When investigating sensitive topics such as modern slavery, it is crucial to explain the risks in a nuanced manner, ideally in the respondent's first language.

3.

## Understanding of modern slavery

The term 'modern slavery' is not universally understood. In some countries, terms like 'labour rights,' 'workers' rights,' or 'human rights' are more appropriate.

4.

## Challenges with software platforms

Finding a software platform that can accommodate the linguistic diversity and personalisation required is challenging.

## Business developments that increase the risk of modern slavery in our supply chain

### DMCs in high-risk markets

Intrepid projects it will open a number of new DMCs around the world over the next five years. Some of these are in countries with the highest prevalence for modern slavery, including Saudi Arabia, Uganda, Rwanda and Myanmar. Opening DMCs in these countries, as well as running trips, will require higher efforts to manage Intrepid's exposure to risk, including through training and supporting vulnerable people such as women and migrants within our supply chain.

### More than Tours – Accommodation

Intrepid is actively expanding into an accommodation vertical. Hotels are a high-risk industry for modern slavery. Hotels are susceptible to the risk of modern slavery because of the casualised and outsourced workforce, the labour intensity of jobs (e.g. housekeeping, cleaning) and the high level of migrant workers. Supplier due diligence needs to be in place for Intrepid hotels within an agreed timeframe, particularly for labour hire companies if we use them. Staff training to recognise the signs of modern slavery in co-workers will be mandatory for Intrepid hotel staff within the first 12 months of acquisition.



# Our next steps in 2025

This statement was approved by the board of Intrepid Travel in their capacity as principal governing body of Intrepid Travel, 17th June 2025.

**Signed on behalf of the Board of Directors**



**James Thornton**  
Chief Executive Officer,  
Intrepid Travel

Signed: 17 June 2025 for the fiscal year 2024 (1 January 2024 to 31 December 2024) for Intrepid Travel.

**Ongoing supplier due diligence prioritising at-risk markets**

- Complete due diligence in high-risk markets in Intrepid’s top 10 most visited countries.
- Complete due diligence of most material suppliers in 18 countries.

**Use Intrepid’s strong industry networks and partnerships to encourage other travel businesses to join new consortium**

- Host industry webinar on modern slavery risk in the travel industry to promote the consortium.
- Provide tools for modern slavery due diligence to consortium members, such as supplier support plans.

**Test alternative due diligence software platforms**

- Continue to seek out and test modern slavery tech platforms that meet Intrepid’s global needs.

**Introduce due diligence programme for Intrepid owned accommodation properties within 12 months of ownership**

- Complete modern slavery training with staff at Intrepid’s Daintree Ecolodge in Tropical North Queensland, Australia.
- Complete modern slavery due diligence on the most material suppliers for the Daintree Ecolodge.

**Child protection**

- Advance the ChildSafe trial in Thailand and Cambodia towards being fully certified.
- Update and publish Intrepid’s Child Protection Policy.

# Appendix

## Progress against the 2024 commitments

Below is a checklist of the specific actions committed to in the 2023 Modern Slavery Statement and a progress update as at the end of 2024.

Topic	Action	Status	Likely Completion Date
More efficient due diligence	Pre-qualify suppliers at high risk of modern slavery through the contracting process.	Not achievable with current technology. Review options with technology team who are implementing Phase 2 of Intrepid's major technology development programme.	2027
	Leverage our vertical DMC model by training our Contracting and Operations Managers to better identify suppliers at greatest risk of modern slavery.	Contracting managers, operations managers and / or general managers trained in four countries.	Ongoing.
Educate suppliers	Create supplier education tools and education opportunities regarding modern slavery risk through existing procurement channels.	<p>The Supplier Handbook was updated in August 2024, with extended information about modern slavery and a section was added on the due diligence process.</p> <p>The modern slavery section of supplier training was updated to more specifically identify risky behaviours in working conditions in tier one and tier two supply chains. This training was delivered at supplier conferences in 2024 to 246 suppliers in 5 countries.</p> <p>All suppliers who complete the due diligence survey are provided a Supplier Support Plan in language that contains links to legislative requirements in their country and resources that they can apply to their business to improve their practices.</p>	Ongoing.
Industry co-operation and advocacy	Build consortium to share experiences and expertise.	Australian Travel Industry Association (ATIA) to host the Travel Industry Modern Slavery Consortium, launching in 2025, with support from Intrepid and Flight Centre.	Launch May 2025 (estimate).
	Maintain active involvement in industry forums and working groups and attendance at key conferences.	<p>GM of Purpose presented on the Tier 2 and Beyond Modern Slavery webinar in July 2024, organised by Informed365 and Better Sydney.</p> <p>Intrepid is a member of the United Nations Global Compact Modern Slavery Community of Practice (UNGCMSCOP) and has attended three meetings since July 2024.</p> <p>Intrepid was invited to participate in a Business Consultation with the UN Special Rapporteur on Contemporary Forms of Slavery, organised by the UN Global Compact. This report examined the practices and challenges faced by the business sector in implementing the Modern Slavery Act in Australia (November 2024).</p> <p>Intrepid was invited to join the Sustainability Professional's Association and invited to a roundtable discussion on Addressing &amp; Reporting on Human Rights in a Changing Regulatory Environment (July 2024).</p>	Ongoing.



Topic	Action	Status	Likely Completion Date
Awareness	Communicate our actions to stakeholders that nominated modern slavery as a core ESG concern – partners and customers.	<p>In July 2024, Intrepid’s partnerships team met with Flight Centre, a key industry partner in Australia, to educate them on the work that Intrepid Foundation partner, Blue Dragon Children’s Foundation, is doing to address human trafficking in Vietnam, and invite them to participate in the Blue Dragon Walk. They agreed to participate in 2025 in Brisbane and Melbourne.</p> <p>The Intrepid Foundation organised a team of comedians to participate in the Blue Dragon Marathon Walk, which received coverage on national TV in 2024.</p> <p>Adventure.com published three articles in 2024 that address modern slavery adjacent content (female oppression in Saudi Arabia and Kenya, and slavery in America).</p>	Ongoing.
Child protection	Create a Child Protection Policy.	The Child Protection Policy work (evolution from the Child Protection Guidelines to a Child Protection Policy) is scheduled for Q2 and Q3 2025. Discussions have been held with the operations team as a key internal stakeholder, and we are considering a policy to cover all vulnerable people.	Completion by September 2025.
	Advance the ChildSafe trial in the Thailand DMC from two actions out of seven to five actions out of seven.	<p>Further training took place in Thailand, but did not advance the programme beyond two actions. ChildSafe trained three cohorts: Intrepid staff; new leaders; and current leaders (refresher). A total of 50 people were trained in Thailand in 2024.</p> <p>The next actions are global actions on the Code of Conduct and updated Child Protection Policy work that is scheduled for Q2 and Q3 2025.</p> <p>Intrepid’s Cambodia DMC joined the programme and achieved two out of the seven actions in 2024. ChildSafe trained 30 leaders (out of 32) and 18 (out of 21) office staff. The Code of Conduct and Child Protection Policy updates will advance the Cambodia DMC as well.</p>	Ongoing.

