

Building travel brands for the future

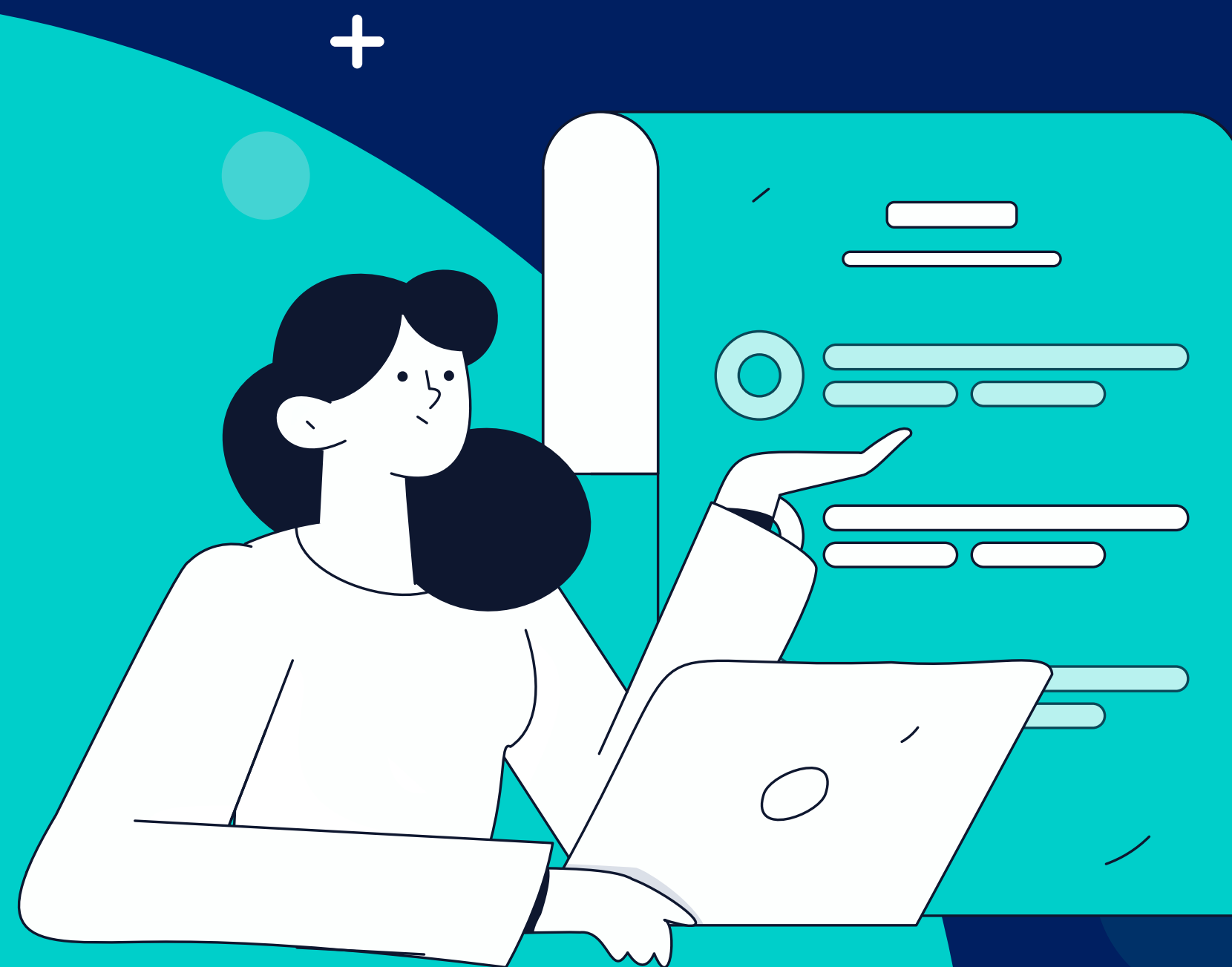
# Modern Slavery Statement 2025



Updated January 2025

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# CEO introduction



At Portman Travel Group, we respect and uphold the human rights of all our employees and the wider community in which we operate. As defined by the UK Government, modern slavery includes slavery, servitude, forced and compulsory labour and human trafficking and it is a clear violation of the human rights we stand for.

In 2024, Portman Travel Group continued to manage the risk of modern slavery in our operations through policy, education and risk assessment. We recognise the importance of our supply chain and the impact we have outside of our own operations. Therefore, in 2025 we are committed to improving our due diligence and collaborating with our trusted partners to ensure that we do our part in the drive to eliminate modern slavery.

This statement outlines the progress we have made in 2024 to prevent modern slavery and human trafficking at Portman Travel Group. It also serves to re-establish our commitment to the global goal of eradicating all forms of modern slavery, as well as setting out our plans for 2025 to continue to mitigate our risk.

**Redmond Walsh**

CEO Portman Travel Group



# What is modern slavery?

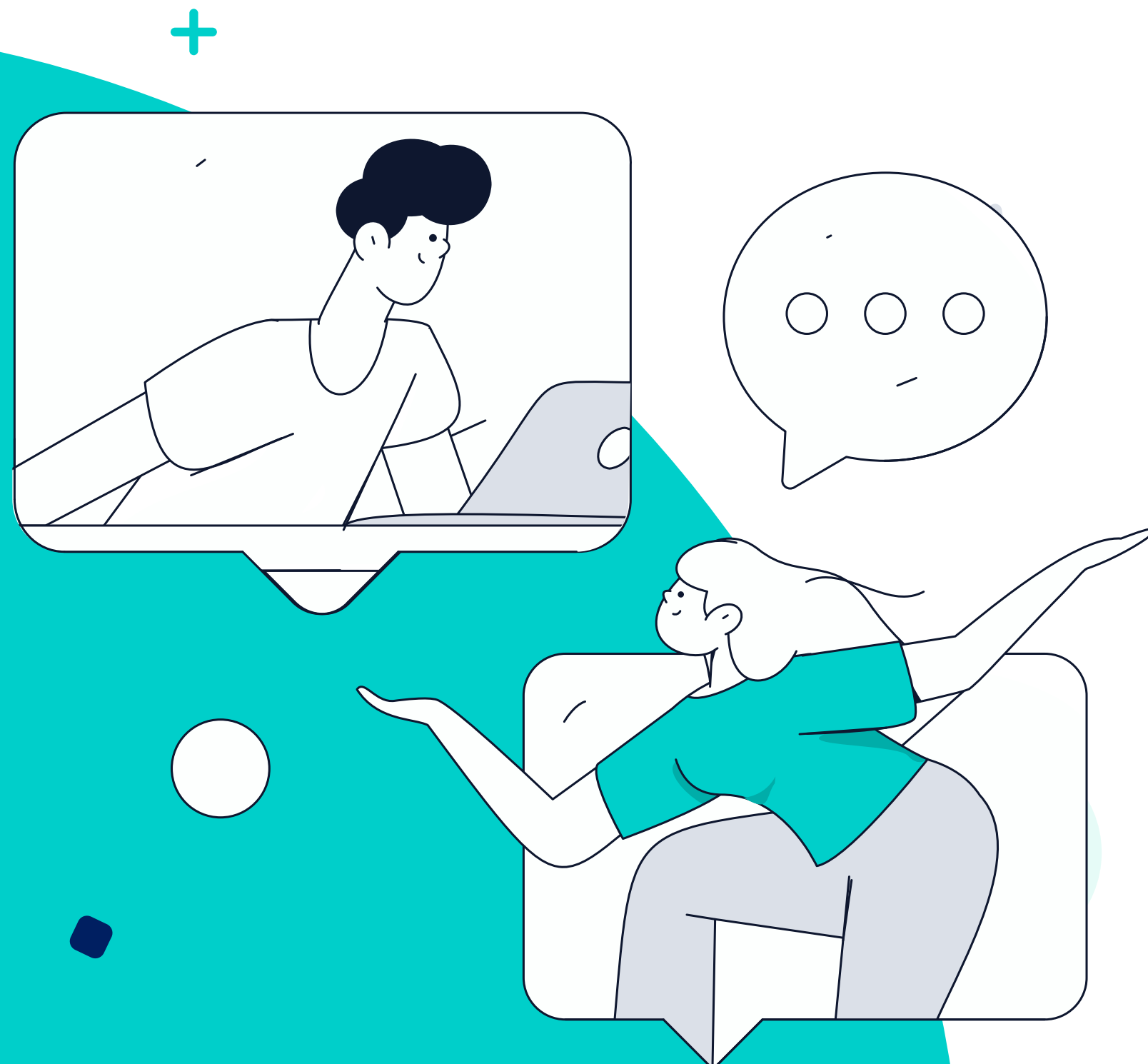
Modern slavery, forced labour, human trafficking, debt bondage and child exploitation are the systematic removal of an individual's personal freedom. On any given day in 2021, there were 50 million people living in modern slavery globally.\* We need to act on a global scale together with business, governments, and other organisations to eradicate global slavery.

As a responsible employer, we have an obligation to protect our people, customers and suppliers from exploitation and slavery-like practices. At Portman Travel Group, we are committed to making sure that every stakeholder recognises and respects international human rights.

We understand that there are areas of risk of modern slavery and human trafficking within the wider travel and tourism industry. According to ABTA, the complexity of supply chains in travel and the reliance on outsourcing in the sector can mean that travel businesses may not have clear sight of all workers' pay and conditions that their customers interact with\*\*. PTG are committed to supporting industry-wide initiatives and working together with our supply chain to take steps to evolve our sector.

\* The Global Slavery Index 2023

\*\* ABTA Tourism for Good A5 Booklet



# Our operations

Based in the UK, Portman Travel Group is a technology-led travel sector specialist, with a portfolio of complementary travel companies. We specialise in acquiring and building global travel brands... to build brands for the future.

- **Clarity Business Travel**

We make business travel straightforward. Delivering the right service at exactly the right moment to get your people where they need to be, safely, efficiently, and cost-effectively.

- **Evolvi**

The acknowledged market leader in online corporate rail booking through its self-booking tool, Evolvi has successfully transitioned into new market area through its rail API, partnering with some of the biggest brands in international travel.

- **One Global**

A global community of world leading TMC's formed by two of the world's largest - Clarity Travel Management and World Travel, Inc. We are a community of local experts, working together to deliver an all-in-one global travel solution.

- **Destination Sport Group**

Destination Sport Group sets the global standard in sports travel, offering our partners and clients a tailored approach and best-in-class solution via seven market leading divisions.

With a global footprint across UK and Europe, North America, Middle East, China and Australia, we are a truly unique sports travel business.

- **If Only**

If Only is a multi award-winning, luxury tour operator that provides bespoke holidays and tours to some of the most breathtaking destinations in the world. We are 100% trade focused, selling our holidays through travel agents.

- **Elegant Resorts**

Founded in 1988, Elegant Resorts were the first specialist tour operator of our kind. We offer our clients an ever-expanding, eclectic portfolio of luxury holidays and bespoke experiences that span the globe – from tropical beach breaks to luxury cruising to culture-rich tailor-made tours.



# Global office locations

UK - London, Reading, Gloucester, Bury St Edmunds, Eastleigh, Derby, Manchester, Stockport, Chester, Glasgow, East Kilbride, Edinburgh

France – Paris

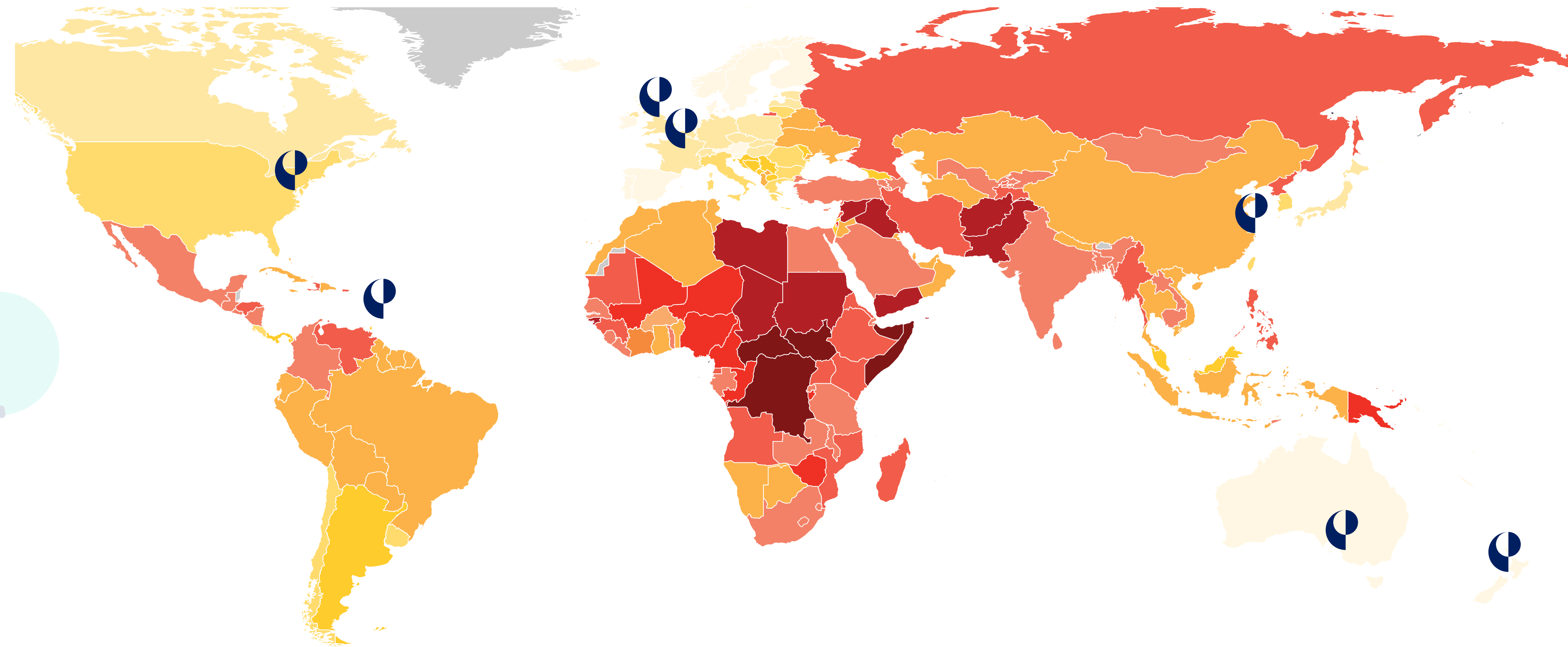
US – Atlanta, Boston

Australia – Adelaide

China – Shanghai

New Zealand – Auckland

Barbados



Map - Estimated vulnerability to modern slavery by country\*

 Portman Travel Group global offices

Low  High

\*Source: Walkfree.org - data-maps

# Policies

The following policies and guidelines assist Portman Travel Group staff and suppliers to ensure the company operates responsibly and protects human rights throughout our operations.



- Risk assessment

Portman Travel Group have conducted a risk assessment based on the Slavery & Trafficking Risk Template by the Social Responsibility Alliance to assess the risk of modern slavery and human trafficking in our operations and supply chain. This assessment is based on key areas including Policy, Supply Chain Management, Risk Identification and Management, Training, Reporting and Internal Accountability, and Certification.

Portman Travel Group currently have no critical or uncomfortable residual risks in relation to modern slavery. Although all risks sit at or within tolerance, we will regularly review risks and controls to ensure we are robustly mitigating against all risk.

- Recruitment & our operations

PTG do not engage in forced labour, child labour or discrimination. Our recruitment practices ensure that right to work checks are performed, a worker's documents are never withheld, recruitment fees are never charged to applicants, and recruitment is predominantly facilitated in-house. PTG pay living wage to all employees and provide every employee with a fair and detailed work agreement.

We acknowledge a remote possibility that recruitment process, and procedures are open to human error, despite training and formal vulnerability assessments taking place. Therefore, there may be a failure to recognise signs of human trafficking in an employee's personal life. Two risks within this category sit at tolerance, predominantly owing to the size of the potential impact.

- Supply chain

Our supply chain across the group is global and varied in company size, location and sector. We assess ourselves to sit at tolerance within our supply chain owing to the nature of the hospitality and travel industry and our limited control regarding the use of sub-contractors, as well as varied or informal supplier agreements.

In 2025 and beyond, we plan to further align procurement and supplier governance process' to support our commitment to eradicate modern slavery and human trafficking to mitigate this risk further.

# Key controls and mitigations

Our key controls and mitigations help prevent and address modern slavery risks, ensuring ethical practices and respect for human rights.

## ● Training & Engagement

All of our employees are asked to complete a mandatory e-learning module on modern slavery. This training must be refreshed every 12 months to ensure adherence and compliance.

Employees are taken through various forms of modern slavery, shown how to recognise indicators and the channels to use to report it.

Engagement with our suppliers is a growing priority for PTG. In 2025, we will launch our updated Supplier Code of Conduct across all business units that sets our expectations for our suppliers.

## ● Living Wage

PTG believe that everyone deserves a wage that meets their everyday needs at a minimum. We have implemented the living wage for all employees across Portman Travel Group. Salary is reviewed on an annual basis to ensure all employees are paid a fair and living wage in accordance with local standards.

## ● Human Rights Policy

In 2024, we published a human rights policy internally which sets out our commitment to respecting and upholding human rights in our internal organisation, supply chain and the wider community that we operate in.

This policy was communicated to all employees and is made available to customers and suppliers upon request.

## ● Whistleblowing

Whenever any threats to human rights including signs of potential modern slavery or human trafficking appear in our operations or our supply chain, PTG encourages and empowers all employees and customers to speak up via our whistle blowing procedure. The procedure is communicated to all employees through the intranet and all disclosures will be addressed in a timely, efficient and confidential manner.

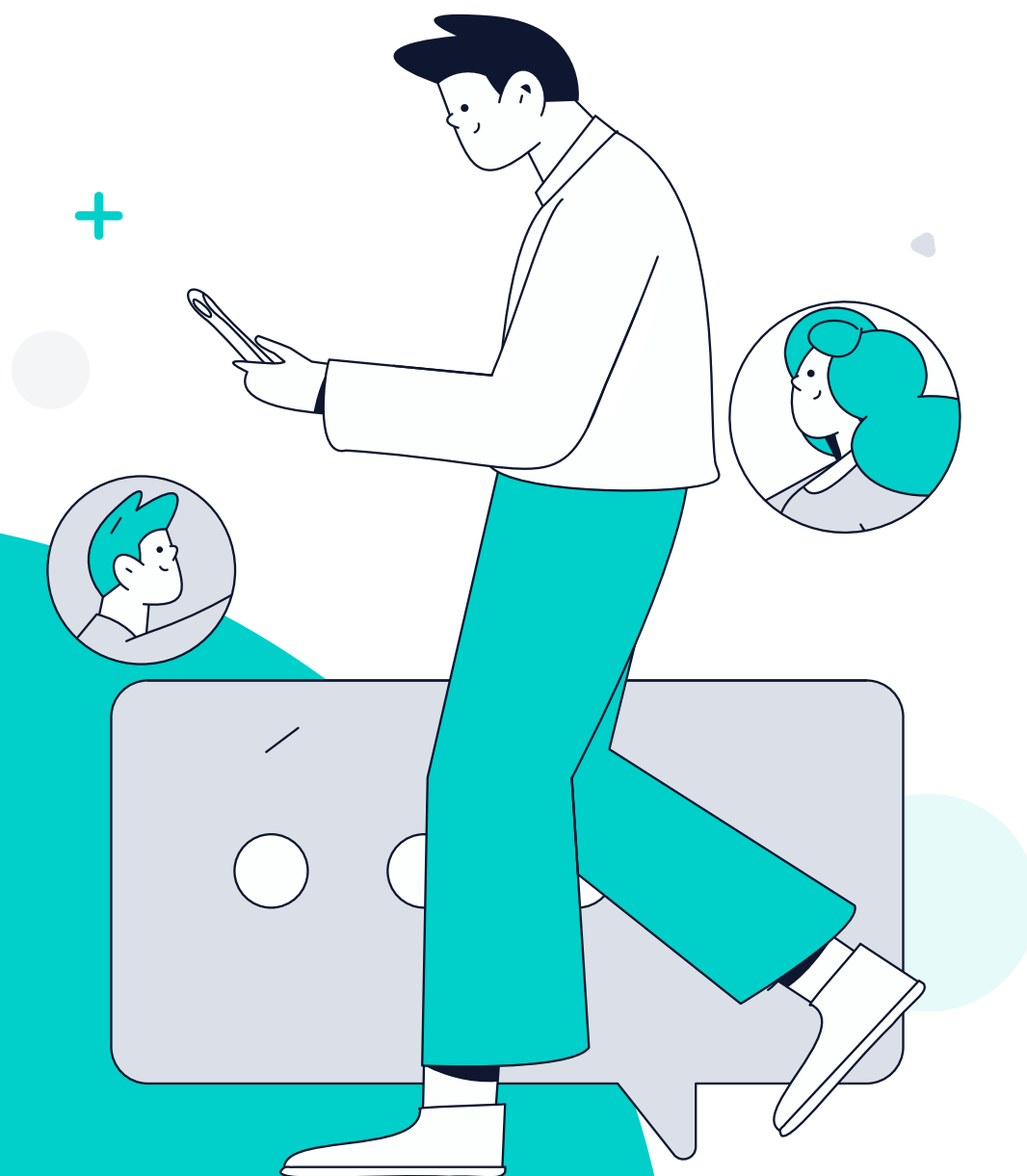
## ● Contracts & Recruitment

In 2024, we have continued to improve our recruitment processes. Portman Travel Group never keep a copy of our employee's identification or Right to Work documents. Our recruitment processes include Right to Work checks, however, this is completed using a system which stores copies and originals of identification documents are always released back to the employee.

All of our recruitment teams are empowered to detect signs of modern slavery during the recruitment process and ensure that all employees have the legal right to work.

Due to the nature of the travel industry, one of our subsidiaries Destination Sports Group does have a select number of zero-hour contracts relating to temporary and seasonal event work.

All PTG employees have employment contracts with clearly defined terms and are encouraged to discuss their contract during the offer stage.





# 2025 commitments



Alongside continuing to implement all current controls, in 2025, PTG will focus on supplier engagement throughout all business units. By working with our suppliers, we will ensure they understand our zero-tolerance stance on modern slavery and human trafficking. We are committed to having a voice within the travel industry through our associations and membership to industry bodies, promoting responsible travel practices and ensuring we remain vigilant against potential exploitation and slavery.

Across the group, we will look to introduce code of conducts in each division to set out guidelines for our suppliers and seek compliance as well as review third-party assurance. We will conduct a review of all contract and procurement practices and documentation across group to ensure consistency and compliance across Portman Travel Group.

Education and Awareness remains a top priority for the year. Based on the latest research by the global slavery index, we will review and update our modern slavery mandatory training wherever necessary, ensuring all employees are provided the most recent training. 90% of staff are targeted to complete mandatory training on modern slavery and human trafficking, this allows for staff that are on temporary leave.

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25 Wilton Road, London SW1V 1LW

[enquiries@portmantravelgroup.com](mailto:enquiries@portmantravelgroup.com)

[www.portmantravelgroup.com](http://www.portmantravelgroup.com)

