



SECRET ESCAPES LIMITED

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

As a global business offering members the opportunity to benefit from all the world has to offer, we know how important it is that everyone, wherever they are based, is treated with dignity and respect. We are particularly aware of the damage that the exploitation of workers can have and are committed to ensuring that modern slavery and human trafficking plays no part in our business or supply chain.

We strive to ensure that the way we run our business deters any form of modern slavery and human trafficking from occurring in our business. As part of this we are constantly working to make sure that the way we work and contract with our partners counteracts the risk wherever possible and that we maintain a working environment and ethos that adheres to the highest standards of business practice.

Our organisational structure and our business

Secret Escapes is an exclusive members only travel club offering our members huge discounts and great deals on hand-picked luxury hotels and holidays.

We offer members the opportunity to book a stay at hand-picked hotels with which we have partnered, book package holidays including flights and hotels, and bespoke dynamic packages.

Secret Escapes is headquartered in London, UK. We also have trading companies and offices across the world, particularly in Europe, the United States and the Far East.

Our staff

We would not be able to deliver our services without the commitment and support of our hardworking and dedicated staff. They are integral to the success of Secret Escapes and so we recognise the importance of creating a fair and equal environment in which to work. To achieve this we not only ensure that our recruitment practices and procedures comply with the relevant local regulations and standards, but we also have in place a Code of Conduct embedding core principles such as integrity and honesty and fairness into the business.

Throughout the employment relationship we also strive to ensure that we take a fair and equal approach to recruiting talent and ensure that no employee is subject to discrimination on any protected ground.

In addition to our directly engaged staff, we also outsource some important services to our trusted partners. We ensure that where staff are engaged through third party organisations, there are clear obligations on those organisations to adhere to all legal obligations in respect of those individuals.

Our supply chains

Part of our business is involved in connecting our members with hand-picked hotels and travel providers. In that way, we act as an intermediary for such suppliers, providing an online platform for our members to book their chosen rooms or holiday.

To offer the great deals and packages to our members we also receive services from destination management companies, hotels (or their operators) and flight aggregators. Our supply chain in engaging with these partners is relatively short and integrated. We nonetheless recognise the risks which our work in some of these industries and geographies can create, so remain vigilant to the risk of malpractice and work hard, through due diligence and practical management to reduce risks wherever possible.

Due diligence

It is a key part of the way we work that we want our contractors, suppliers and other business partners to uphold the same high standards as we do. This is particularly in relation to ensuring that all employees and workers are treated with dignity and respect in a fair and ethical environment.

We work hard to ensure that we are only partnering with organisations that uphold the appropriate standards and attitudes towards staff engagement and treatment. In that respect our due diligence processes seek to identify, assess, and monitor any potential areas of risk in relation to our business and supply chains. This includes considering the type of services being carried out, the nature of what is being supplied and the location from where it is being supplied. We will continue to look to manage any risks identified and work with our suppliers and manufacturers to uphold ethical standards.

Assessing and managing risk

As a global business our business relationships are worldwide. We recognise that the risk of modern slavery and human trafficking is higher in certain jurisdictions, but we work hard to ensure that the requisite standards are met wherever in the world our partners and suppliers are based. To help with this process we have implemented a Modern Slavery Act policy, which is included in our staff handbook. This ensures that our staff are aware of the risks that modern slavery poses, are alive to it as an issue whenever engaging with suppliers and can raise concerns quickly if issues do come to light.

In contracting with hotels, destination management companies and flight aggregators we strive always to build relationships so that they understand the importance we attribute to maintaining standards and an approach to business and operations which reflects our own. In that respect we do always ensure that we meet directly with the destination management companies with which we contract. We also carry out audits of a number of our partner hotels across the world.

In addition, we require that suppliers enter into standard contractual terms which require their compliance with all laws, including in their engagement and treatment of their own workforce.

Training

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. All staff are required to read our staff handbook on joining the company, including the specific provisions dedicated to helping staff understand what modern slavery is and how to report any concerns they may have.

We recognise that this is a complex area, and no one-size-fits-all approach is appropriate so we endeavour to keep staff involved in the procurement part of the business informed to ensure that our practices continue to be appropriate to the way we work.

Looking ahead

Looking to the future, we intend to build upon the existing contractual obligations with our suppliers to push the standards of compliance throughout their own supply chains. We will also continue to work with our partners to ensure adherence to the standards which we expect.

This statement is given on behalf of Secret Escapes Limited for the financial year ending 31 December 2018. It sets out the steps taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.



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Alex Saint
Director
Signed on behalf of Secret Escapes Limited

13 May 2019