

Modern Slavery and Anti-Human Trafficking Policy



1. Policy Statement

Nerpa Travel is committed to a zero-tolerance approach to modern slavery and human trafficking in all of its business operations and supply chains. We are dedicated to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our business or within any of our supply chains.

This policy is in line with our obligations under the UK's Modern Slavery Act 2015 and reflects our commitment to upholding human rights. We expect the same high standards from all our employees, suppliers, contractors, and other business partners.

2. Scope

This policy applies to all individuals working for Nerpa Travel or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, and any other business partners.

3. Responsibility for the Policy

Overall Responsibility: The Board of Directors of Nerpa Travel has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Day-to-day Management: The [Insert relevant department, e.g., Human Resources, Compliance, or a specific Director] is responsible for the day-to-day implementation of this policy, monitoring its effectiveness, and investigating any allegations of modern slavery in our business or supply chains.

Employee Responsibility: All employees are responsible for adhering to this policy and for reporting any concerns they may have regarding modern slavery.

4. Our Business and Supply Chains

As a UK-based travel company, our business and supply chains are inherently diverse and global. Our supply chain includes, but is not limited to:

- Hotels and accommodation providers

- Local ground handlers and tour operators
- Airlines and transportation companies
- Recruitment agencies
- Suppliers of office goods and services

We recognise that certain parts of our supply chain, particularly those operating in regions with a higher risk of labour exploitation, may be more vulnerable to modern slavery. We are committed to a risk-based approach to identify, mitigate, and manage these risks.

5. Due Diligence and Risk Assessment

We will undertake the following measures to assess and manage the risk of modern slavery:

Supplier Due Diligence: We will conduct due diligence on new and existing suppliers, particularly those in high-risk sectors or locations. This may include:

- Reviewing their anti-slavery policies and statements.
- Including specific anti-slavery clauses in our contracts.
- Conducting site visits or audits where appropriate.
- Using third-party tools or indices to assess country-specific risks.
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Risk Mitigation: Where we identify a potential risk, we will work with the supplier to implement a corrective action plan. If a supplier fails to demonstrate a commitment to addressing the issue, we reserve the right to terminate our business relationship.

Internal Operations: We ensure that our internal recruitment and HR processes are robust and designed to prevent modern slavery, including:

- Verifying the identity and right-to-work of all employees.
- Ensuring fair and legal wages and working hours.
- Providing a safe and respectful work environment.

6. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking, we will provide training to our employees. This training will be tailored to the roles of different teams, particularly those involved in procurement, human resources, and supplier management. The training will cover:

- The signs of modern slavery and human trafficking.
- Our company's policies and procedures for prevention.
- How to report suspected cases.

7. Reporting and Whistleblowing

We encourage all employees, contractors, and business partners to report any concerns related to modern slavery in any part of our business or supply chain.

Employees should report concerns to their line manager or the designated HR/Compliance contact.

We have a confidential whistleblowing procedure in place to allow for the reporting of concerns without fear of retaliation.

8. Policy Review

This policy will be reviewed and updated on an annual basis to ensure its continued relevance and effectiveness. Any changes will be communicated to all relevant stakeholders.

26/08/2025

Thomas Weiser - Co-Founder COO